
Land at Bond Road, Mitcham, CR4 3HG

London Borough of Merton Draft Local Plan
Representations Stage 3 Publication

Prepared by Barton Willmore LLP on behalf of
Hoo Hing Ltd and Elbrook Cash & Carry Ltd

September 2021

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Prepared by:	Victoria Bullock	Victoria Bullock
Checked by:		Iain Painting
Authorised by:		Victoria Bullock

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: 020 7446 6888
Email: Victoria.bullock@bartonwillmore.co.uk

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1.0 INTRODUCTION

1.1 These representations are submitted in response to the London Borough of Merton (LBM) Stage 3 Draft Local Plan (LP) consultation on behalf of Hoo Hing Ltd and Elbrook Cash & Carry Ltd. Representations were also submitted at Stage 2a.

1.2 The Site at Bond Road, Mitcham ('the Site') is owned by our clients, it is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The Site amounts to some 1.3 ha. A Site Location Plan is attached at **Appendix 1**.

1.3 Our clients wish to promote their land interest through the emerging LP for a residential site allocation for the reasons set out in this report. This Report firstly provides some background to the Site and its suitability for residential use. Following this, we assess the Draft Local Plan and provide our detailed response to the consultation and the need to allocate further sites for residential in order to meet housing need. To confirm our clients wish to appear at the Examination.

1.4 To confirm, these representations relate to the following policies:

- Policy N4.1 Mitcham (with supporting paragraphs 4.1.1 – 4.1.16).
- Allocations (within Chapter 4).
- Policy H11.2 Housing Provision (with supporting paragraphs 11.2.1 – 11.2.22).
- Strategic Policy EC13.1 Promoting economic growth and successful high streets
- Policy EC13.3 Protection of scattered employment sites (with supporting paragraphs 13.3.1 – 13.3.10).

2.0 THE SITE AND SURROUNDINGS

- 2.1 The Site is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The Site amounts to some 1.3 ha. A Site Location Plan is attached at **Appendix 1**.
- 2.2 The Hoo Hing Cash & Carry is situated adjacent to the Asda supermarket which fronts to Western Road (A236). They both share a vehicular access directly from Bond Road. The Hoo Hing building is located perpendicular to Bond Road and has a large building floorplate with an office and staff ancillary services to upper floors. It has customer car parking to the frontage and is serviced via a loading area to the rear.
- 2.3 The Elbrook Cash & Carry is located to the east and has direct vehicular access from Bond Road, with customer car parking to the front. The main building has a large floorplate and is a building of notable height with ancillary offices to the upper floors to the front section of the building, the rear being given over to the cash and carry to enable products to be stored to the maximum height of the building as one storey. There are further buildings to the rear that store products to replenish the cash and carry. The loading / service area is to the east of the main building.
- 2.4 To the rear of the site along the southern boundary of the site is a further four storey building providing a banqueting hall facilities and restaurant known as Chak89. To the east of this is a further storage building associated with the Elbrook Cash & Carry. Beyond this is a two-storey building providing office accommodation and an industrial kitchen with car parking to the front. These buildings are all accessed /serviced from the main Bond Road vehicular access point. However, there is a further access from the adjacent site to the east.
- 2.5 To the east of the site is the Embon Cash & Carry and further workshop / employment uses. Beyond this is the Bond Primary School. The northern side of Bond Road is primarily residential in character, with what is understood to be a 43 flat sheltered housing scheme of 3 storeys in height (LPA Ref: 11/P1772). Beyond this to the east are two storey terraced residential properties. To the south west is the Sadler Close residential development comprising residential blocks of circa five storeys in height with surface level car parking. The blocks span Sadlers Close and are linked by raised residential links at upper levels. On the opposite side of Western Road is the former Mitcham Gasworks.

- 2.6 The Site is not within a Conservation Area. The nearest listed building is the Grade I Eagle House fronting London Road. Further, there are no Tree Preservation Orders (TPO's) on the Site. Only a small part of the site falls within an Archaeological Priority Zone. The Site is located in its entirety in Flood Zone 1 on the Environment Agency's online mapping and therefore not at risk of flooding. There is no planning history relevant to redevelopment of the Site for alternative use.
- 2.7 The site is PTAL Level 3. It is located 600m from Mitcham Town Centre. It lies circa 1 mile from Colliers Wood Underground Station providing Northern Line services into central London in 30 minutes. It is 1.3 miles to Mitcham Junction Train Station providing Southern Railway services to Epsom, Sutton, London Victoria and St Albans. Moreover 0.8 miles to the Phipps Bridge Road Tram Station providing services to Wimbledon to the north and Croydon to the east.

3.0 THE CASE FOR DEVELOPMENT: THE ALLOCATION OF BOND ROAD

3.1 The following section assesses the Site's development potential in the context of the emerging Local Plan and the adopted New London Plan March 2021 (NLP). It relates to the following policies:

- Policy N4.1 Mitcham (with supporting paragraphs 4.1.1 – 4.1.16).
- Allocations (within Chapter 4).

Available and Deliverable

3.2 The site is 1.2ha and falls within two landownerships. As such complex land assembly would not be required to bring the Site forward. It is our client's desire to secure an allocation and pursue planning permission. This would allow the early delivery of new homes from 2023/24 onwards. The site is therefore available and deliverable.

Lack of Physical and Technical Constraints

3.3 The site is previously developed with limited vegetation, and therefore impact on landscape and biodiversity will be minimal. The Site is not liable to flooding, nor does it sit within close proximity to any heritage assets. The site falls partly within an Archaeological Priority Zone which is not considered to be an impediment to development.

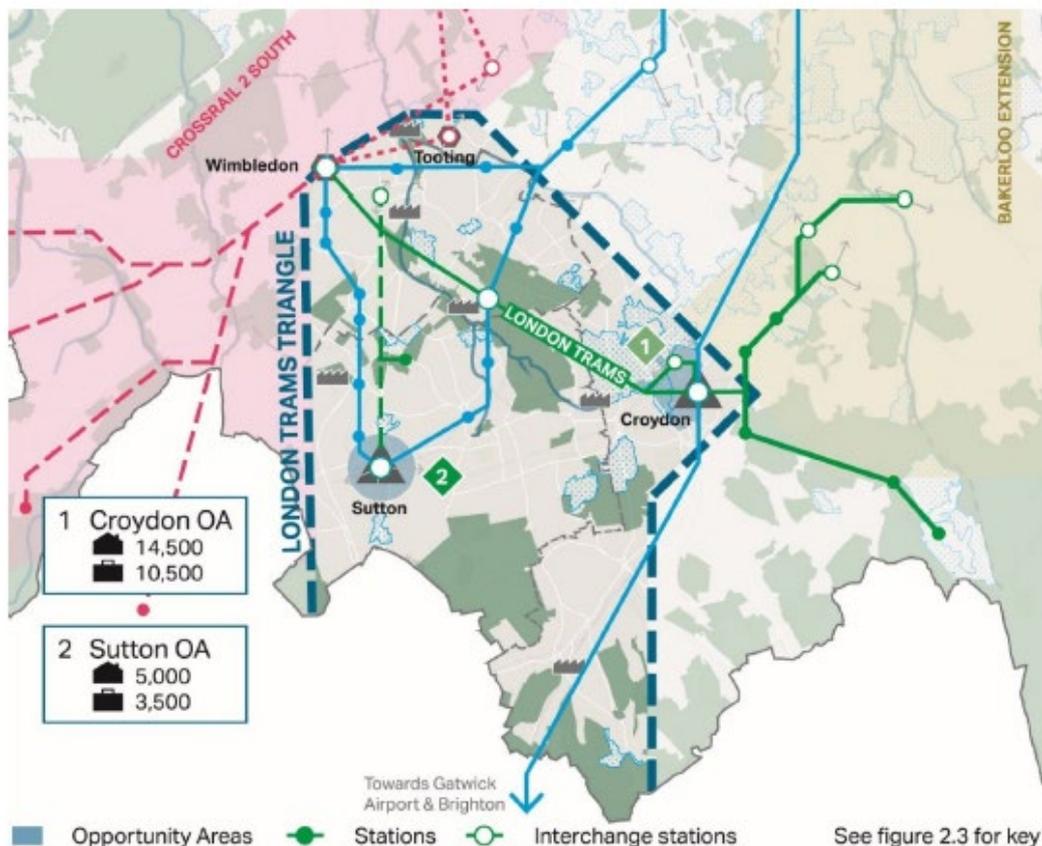
3.4 In terms of access, it is anticipated at this stage that Bond Road would be capable of accommodating acceptable access points for residential development. Further, that a residential scheme could be accommodated in terms of highways capacity, and indeed would be likely to have a significantly reduced impact in terms of a) vehicle movements; and b) residential amenity, compared to the existing uses on the site. This would be assessed and tested further through a planning application.

3.5 The potential technical constraints associated with the former Mitcham Gasworks is considered below.

The role of Mitcham

- 3.6 The emerging Local Plan (LP) seeks to respond to the NLP and the importance placed on achieving good growth. NLP Policy SD1 Opportunity Areas identifies areas with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Rather than see Opportunity Areas in isolation the NLP seeks to identify Growth Corridors to demonstrate linkages between the Opportunity Areas (OAs) to ensure that the full potential of the growth corridors and OAs are realised.
- 3.7 In this respect Mitcham is situated near the Crossrail 2 Growth Corridor and the Wimbledon / Colliers Wood / South Wimbledon OA which has an indicative capacity of 5,000 new homes. Moreover, the site falls within the Trams Triangle / London-Gatwick-Brighton mainline Growth Corridor which is broadly delineated by Tooting to the North, Croydon to the East and Sutton to the West and identifies Sutton and Croydon as OAs, see extract below:

Figure 2.12 – Trams Triangle



- 3.8 We support the importance placed in the emerging LP on creating good growth and that the broad locations of growth being the Wimbledon/Colliers Wood/South Wimbledon OA. Beyond this the LP envisages that development will take place, but not to the same scale.
- 3.9 The LP identifies that Mitcham experiences problems of deprivation including health, income and housing challenges. We would reiterate our comments made at Stage 2a and would question whether the LP is sufficiently aspirational in its approach to Mitcham and the areas that fall between Tooting, Croydon, Morden and Colliers Wood and the associated major infrastructure and services investment being directed to these areas. The LP should seek to ensure that this investment and growth achieves maximum benefits and stretch within the Borough. Moreover, the opportunity to achieve growth and regeneration in Mitcham in its own right.
- 3.10 It is noted that the GLA in their Stage 2A response also highlighted this stating 'The priorities for the growth areas identified in Chapter 2 are clear and welcome but regard should be had to Table A1.1 of the PLP which identifies the town centres of Wimbledon, Mitcham, Morden and the potential district centre of Colliers Wood and broadly categorises their potential to accommodate different types of growth, including residential and office development'. Specifically, the NLP Table A1.1 identifies Mitcham as having 'high' residential growth potential and a 'strategic area for regeneration' on the basis that this classification relates to those town centres that are within or overlap with Strategic Areas for Regeneration. Specifically in our view there is a need to allocate further sites for housing development in order to achieve the housing requirement, including within Mitcham as per the above.

Changing Pattern of Development

- 3.11 The character of the surrounding area has undergone change in recent years as considered below, however there is a need for further improvements. The Merton Borough Character Study SPD 2021 identifies that the Site falls within the Mitcham Area, this is then divided into 10 neighbourhoods. The site falls in the Mitcham neighbourhood. The Mitcham Growth Theme Diagram (page 63) is an illustrative diagram indicating the overall extent of potential growth and strategic character led proposals for the borough area. This identifies the A236 Western Road as a Corridor of Intensification (minor), moreover the Mitcham Gas Works site and area extending to Bond Road as an area to 'Reimagine Character'. The Growth Themes identify the A236 Western Road as having a poor-quality street environment with

gaps in the frontage providing a good opportunity to repair the condition of the route, alongside improvements to walking and cycling infrastructure and greening enhancements to contribute to a more positive pedestrian experience.

- 3.12 The allocation of the Site for residential use offers the potential to provide improvements to Bond Road and Western Road through public realm improvements, improved street edges and high-quality architectural buildings. Residential use would also be consistent with the existing land use character of the area which includes residential to the north and south of the site. The site is also of a sufficient size to enable an appropriate interface to be achieved with the Cash & Carry on the adjacent site to the east and employment uses / workshops beyond to ensure their continued operation.
- 3.13 The allocation of the Site would also provide an opportunity to contribute to the emerging changing pattern of development through the redevelopment of the Mitcham Gasworks located on the other side of Western Road, opposite Asda. This the subject of an allocation in the emerging Draft Local Plan (Site Mi16) for "Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre)." It is also the subject of an existing allocation in the Adopted Local Plan (Site 75)
- 3.14 The Mitcham Gasworks was the subject of an outline grant of planning permission dated 28th July 2009 (LPA Ref 06/P0984) secured on appeal for 'the redevelopment of the 3.97ha site for a mix of uses comprising residential (C3) (1.95ha); employment (B1) (1.28ha); Live Work (0.05ha); and public open space (0.65ha)'. From the emerging site allocation, it is understood that the residential element of the permission (Hay Drive) has been built out, however that the employment element to Western Road lapsed in July 2012. The site is being jointly promoted by St William Homes LLP and National Grid Property.
- 3.15 If the entirety of the site is to be redeveloped, a further planning permission will be required. In this respect, whilst the allocation includes residential use, it notes that the potential land uses, and layout are currently constrained by the existing gasholder which, whilst no longer used, has not been officially decommissioned. It is understood that the developers are proposing its formal decommission. However, until such time as this has been completed, development is still limited by the Health and Safety Executive's land use planning method (PADHI). Within their representation at Stage 2A the promoters of the site anticipate that a planning

application will be submitted late 2021 and thus an ability to contribute to the 5-year housing land supply. The intention is therefore to bring the site forward and decommission the Gasworks in the short term.

- 3.16 Attached at **Appendix 2** is Drawing 2081_SK_565B Illustrative Layout as cited at para 2 of the above Appeal Decision. This drawing shows the PADHI Zones and that residential development was approved to the Outer Zone, with non-residential uses within the Inner Zone and Middle Zone. Having regard to the zones, only a small proportion of the Bond Road Site falls within the Middle Zone. Most of the Site falls where residential was considered acceptable as per the July 2009 Permission, i.e., the Outer Zone and beyond. It is therefore considered that even if the gasworks is not formally decommissioned, that residential development can come forward on the Site and the PADHI considerations can be addressed at application stage through a detailed site layout. However, like the Mitcham Gasworks allocation, the formal decommissioning of the gasholder will open wider possibilities in terms of layout and use to this part of the site.
- 3.17 The allocation of the Mitcham Gasworks seeks to change the pattern of development and character of the area. The allocation notes the 'excellent opportunity to enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to the overall surroundings and connectivity to the town centre'. Moreover, the opportunity to deliver much needed new homes.
- 3.18 The allocation of the Bond Road Site is consistent with the existing and emerging character of the area and would offer the opportunity to contribute to these objectives. It also offers an exciting opportunity to deliver substantial new homes near the town centre and assist addressing the existing housing problems in Mitcham. It could also make a valuable contribution to addressing the Borough's affordable housing needs.

Contribution to Housing Need

- 3.19 The NLP sets out a need for 9,180 new homes in LBM over the period 2019/20 to 2028/29 (Table 4.1), whilst annual targets have been removed from the London Plan this would equate to 918 units per annum. This represents a notable increase from the London Plan 2016 annual target of 411 dwellings for LBM. The Draft LP Policy No H11.2 sets out an aim to deliver 11,732 additional homes for the period 2021/22-2035/36, this would equate to an annual target of 782 per annum, albeit based on Figure 4.2.1 the housing target changes through the plan period.
- 3.20 We consider the housing requirement and the housing delivery issues associated with Draft Policy H11.2 in Section 4 below. However, by way of summary we would question the target proposed for the period beyond 2028/29. This is unusually low given the provisions in the SHLAA 2017, the level of unmet housing need in London and given the likely review of London Plan housing targets.
- 3.21 We would highlight that based on para 11.2.2 of the emerging Local Plan, 50% of the Council's historic delivery of housing (based on the 411 target) is achieved by small sites (under 10 units). The increase in the London Plan housing target to 918 dwellings per annum signals the need for a step change in housing delivery and thus a change in policy and approach of the Council to encourage larger sites to come forward. This also points to the need to allocate further sites to ensure housing supply and achievement of housing targets.
- 3.22 The Bond Road Site represents an opportunity to provide a notable number of homes towards the annual requirement and meet local housing needs including the provision of affordable homes.

The Proposed Allocation

- 3.23 To assist the preparation, we enclose at **Appendix 3** wording for the draft allocation of the Site using the Council's template. This should be added to the sites allocated in Chapter 4 Mitcham.

4.0 RESPONSE TO LOCAL PLAN

4.1 Overall, our clients are broadly supportive of the approach to growth and the importance of meeting housing needs, but question whether the Draft LP provides for a robust and justified housing requirement for the period beyond 2028/29, whether it will achieve that housing target without the allocation of further sites and a review on the approach to employment sites. This section sets out our response to:

- Policy H11.2 Housing Provision (with supporting paragraphs 11.2.1 – 11.2.22).
- Strategic Policy EC13.1 Promoting economic growth and successful high streets
- Policy EC13.3 Protection of scattered employment sites (with supporting paragraphs 13.3.1 – 13.3.10).

Policy No. H11.2 Housing Provision

4.2 The NLP sets out a target of 9,180 new homes in LBM over the period 2019/20 to 2028/29 (Table 4.1), whilst annual targets have been removed from the NLP this would equate to 918 units per annum.

4.3 The Draft LP Policy No H11.2 sets out an aim to deliver 11,732 additional homes for the period 2021/22-2035/36, this would equate to an annual target of 782 per annum over the plan period. However, the target changes through the plan period, and housing trajectory, as follows:

Plan period	Dwelling target	Comments
2021/22 – 2028/29	8265 units (1033 dpa)	Presumed to be based on the NLP target but updated to reflect supply to date.
2029/30 – 2033/34	2370 units (474 dpa)	Stated as being based on the SHLAA 2017.
2034/36 – 2035/36	1096 units (548 dpa)	Stated as being based on the SHLAA 2017.
Total	11,731 (782 dpa)	

- 4.4 From supporting paragraph 11.2.4 the Council has sought to gradually step up to the NLP target over the 10-year period. It is noted that this approach is supported by the NLP at paragraph 4.1.10:

"....The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery."

- 4.5 Whilst a stepped approach is supported by policy it needs to be accompanied by the actions that the Council will take in the event of under delivery. The measures to be adopted in the event of under delivery are not set out in the Draft Local Plan. This is pertinent as it appears that the Council is already experiencing under delivery. A recently allowed appeal dated 29th June 2021 concluded that the Council did not have a 5-year housing land supply when assessed against the NLP housing target (APP/T5720/W/20/3250440). As further evidence of this, the Merton AMR for 2019/20 shows housing completions at 273 units for 2018/19 and 375 units for 2019/20 which is significantly under the old London Plan target of 411 units.
- 4.6 It is noted that the Council's AMR 2019/20 includes reference to a Housing Delivery Test Action Plan which is stated as setting out the actions the Council can take to increase the rate and number of homes (Para 4.28). This document does not appear in the Council's Local Plan Evidence Base webpage and a search of the Council's website has not identified it. We would suggest that it needs to be made available to enable scrutiny given the recent appeal decision, lack of a 5-year housing land supply and the need for a step change in housing delivery.
- 4.7 In terms of the target beyond the NLP ten-year period which ends 2028/29, the draft Local Plan states that the figures are based on the SHLAA 2017. In this respect, the NLP states the following at para 4.1.12:

"If a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could

be delivered as a result of any committed transport infrastructure improvements and roll forward the housing capacity assumptions applied in the London Plan for small sites.”

- 4.8 In this respect it is not clear what process LBM have taken to establish the housing requirement for this period beyond 2028/29. Moreover, whether this has been agreed with the GLA. Nor how it relates to planned improvements to transport infrastructure. From the GLA’s Stage 2a response dated 1 February 2021 this implies that they had not been consulted:

“Merton should note that where boroughs require a housing target beyond 2029 the PLP is clear in paragraph 4.1.11 that targets should draw on the 2017 SHLAA findings (which cover the period to 2041) and any local evidence of identified capacity in consultation with the GLA, and should also take account of any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions for small sites.”

- 4.9 The approach needs to be clarified as the SHLAA 2017 states at Table 1.1 that Merton has an overall capacity of 13,280 dwellings for the 10-year period to 2028/29. The NLP only set a target of 9,180 dwellings for Merton which equates to 4,100 less than the SHLAA capacity identified. It is odd then for the housing target to 2035/36 being even less than the SHLAA identified capacity for the 10-year period to 2028/29. Added to this the fact that the SHLAA identifies a further capacity for the period 2029/30-2040/41.
- 4.10 The 2017 London Strategic Housing Market Assessment (SHMA) which forms part of the NLP evidence base concludes that there is a pan London need for an additional 65,900 homes per year between 2016 and 2041 to meet existing and future need, of which 47% would need to be affordable homes and 18% intermediate. The Mayor’s Annual Monitoring Report 16 2018/19 March 2021 shows delivery of 44,701 (2016/17); 31,201 (2017/18) and 31,201 homes (2018/19) in the last 3 years, a considerable shortfall against assessed housing needs with 2018/19 being less than half of the actual need.
- 4.11 The NLP targets should therefore be a minimum starting point in the context of the pan London shortfall against targets and resultant unmet housing need. Indeed, at

the time of Examination of the NLP, it was widely considered that there was a need for an early review to housing targets. Moreover, the Secretary of State has identified the need for an early review of the NLP against the policies of the then NPPF 2019, further updates have since been published. The Examination was held January – May 2019 and there has been no formal review has commenced.

- 4.12 In terms of a review against the NPPF Policies, this sets out the assessment Local Plans should undertake to establish housing targets. Paragraph 61 reads: *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."* (our emphasis).
- 4.13 The 'Housing Needs and Economic Assessment' (HNEA) Planning Practice Guidance (PPG) which supports the NPPF states, *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations"*¹ (our emphasis). PPG clarifies the *need* assessment should be unconstrained and separate from determining a housing *requirement*.
- 4.14 PPG goes on to state that Standard Method (SM) identifies *"identifies a minimum annual housing need figure. It does not produce a housing requirement figure."*² (our emphasis)
- 4.15 Under the New Standard Method December 2020, the minimum annual need figure for Merton would be 2,033 units per annum. This is over double the NLP target of 9,180 (918 per annum). Indeed, all London Boroughs see an increase. This points again to the need for the need for an early review of the NLP housing targets and indeed for Draft Policy H11.2 to look forward rather than backwards and have regard to the Standard Method and not simply relying on the NLP target for the period to 2028/29 or indeed seek to reduce the housing target beyond this to 2035/36. This approach is likely to worsen housing need in the short, medium and long term given the historic shortfall in provision across London and that the

¹ PPG ID2a-001

² PPG ID2a-002

minimum annual need figure as per the Standard Method is higher for all London Boroughs and is more than double the NLP target for Merton.

- 4.16 In short there is a need to review the minimum annual housing need in Merton, review land availability and establish the appropriate housing requirement figure and allocate sites / write planning policies to positively achieve that housing requirement and growth. Certainly the SHLAA 2017 indicates that there is a greater capacity for housing growth in the borough compared to the NLP target set. The SHLAA 2017 identifies a 10-year capacity of 13,280 with an annual capacity of 1,328 dwellings. As drafted the policy approach of delaying delivery through a staggered approach to targets and then a very low target beyond 2028/29 is not justified and is likely to exacerbate housing need.
- 4.17 In the context of the above we would question whether the growth strategy is sufficiently ambitious to achieve the requirement, whether sufficient number and type of sites are allocated to ensure housing supply and whether the policies are positively prepared or effective in achieving the requirement or the step change in approach that is needed given the historically low levels of housing delivery.

Strategic Policy EC13.1 Promoting economic growth and successful high streets

Policy EC13.3 Protection of scattered employment sites

- 4.18 It is noted that in addition to policies protecting Strategic Industrial Land (SiL) and Locally Significant Industrial Sites (LSIS) the draft LP includes Policy EC13.3 relating to what is referred to as 'scattered employment sites.' These are understood to be non-designated sites in employment use, with paragraph 13.3.1 seeking to ensure that a wide range of employment uses are caught by the policy. The policy wording resists loss of such sites to residential uses except where:

- i.** The site is located in a predominantly residential area, and it can be demonstrated that its operation has had a significant adverse effect on local residential amenity;
- ii.** The size, configuration, access arrangements and other characteristics of the site make it unsuitable and financially unviable for whole-site employment use; and

- iii. It has been demonstrated to the council's satisfaction that there is no realistic prospect of employment or community use on this site in the future. This may be demonstrated by full and proper marketing of the site at reasonable prices for a period of 18 months (1½ years).

If proposals do not meet policy requirements of E13.3 (a) (iii) above, the council will seek measures to mitigate against the loss of employment land. Such measures may include providing employment, as part of a mixed-use scheme on site."

4.19 The above is a repeat of Policy DM E3 of the Adopted Sites and Policies and Policies Map July 2014. The above policy was prepared the context of a historically low housing requirement. It has the effect of restricting residential use and in real terms treats non-designated employment sites as if they were designated employment sites.

4.20 The recent appeal decision has demonstrated that the Council cannot demonstrate a 5-year housing land supply, with the Inspector concluding that Para 11d of the NPPF was engaged with a presumption in favour of a grant of planning permission. Whilst that case did not consider the above policy. We would question whether it is positively prepared and whether the 'carrying over' of this policy will achieve the growth aims of the Local Plan. To achieve the step change in supply, in addition to allocating further sites, the Council needs to critically review policies that restrict housing.

4.21 We would also question whether the policy is consistent with the provisions of the NLP. Policy E7 Industrial intensification, co-location and substitution sets the policy position for non-designated industrial sites. It states the following:

C Mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:

- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or

- 2) it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or
- 3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of Policy E2 Providing suitable business space).

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Parts D2 to D4 below.

- 4.22 We would question why the Adopted NLP Policy is not sufficient to achieve the Council's aims. The proposed approach will see both policies applied on some sites and serves to add an unnecessary additional layer development management causing confusion and uncertainty. For these reasons the policy is not effective and should be deleted.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 It is clear that there are exorbitant housing needs London-wide. The Council are unable to demonstrate a 5-year housing land supply based on a recent appeal decision of June 2021. The NLP target (918 per annum) more than doubles the requirement to be met. Indeed, the Standard Method December 2020 identifies a minimum annual need figure for Merton of 2,033 units per annum. Whilst this is not a housing requirement, it does indicate the extent of need that would not be met by the NLP housing target. Moreover, it is also over three times the current target that Council have been used to meeting and preparing and applying planning policy to achieve.
- 5.2 There is a need for a step change in housing delivery to meet the housing requirement. This requires a change in approach to the preparation of the LP, a change to the approach and number of site allocations and development management policies. For example, the historic supply that LBM are used to achieving is based on 50% provision on small sites (i.e., 200 units per annum). This supply from small sites is unlikely to be capable of being extrapolated up to reflect the new housing requirement. Indeed, that approach is also unlikely to achieve good growth or ensure that the growth and regeneration potential of the various OAs and growth corridors and their surrounding areas are achieved.
- 5.3 There is a need to allocate further large sites for residential use and to ensure that policies are prepared positively to achieve necessary growth and do not unnecessarily duplicate and /or add further details to the those in the NLP. In this respect the Local Plan needs to be more aspirational in terms of the role of Mitcham and its need for growth and regeneration.
- 5.4 The allocation of the Bond Road Site would serve to assist the above. It is available and deliverable and could contribute to housing supply and affordable housing within the first 5 years of the plan period. There are no physical or technical constraints to delivery. The allocation of the Site would also provide an opportunity to contribute to the changing pattern of development coming forward through the redevelopment of the Mitcham Gasworks located on the other side of Western Road, opposite Asda.

5.5 In summary, the Draft Local Plan should be amended as follows:

- The Draft Local Plan should be mindful of the Standard Method and set out how it would seek to address the needs arising from application of this within the Borough.
- Publish the Housing Delivery Action Plan to set out the measures to increase supply of housing.
- Allocate further sites to ensure that NLP targets, and indeed identified need, can be met earlier in the Plan period.
- Allocate Bond Road site as a residential allocation; and
- Delete Policy EC13.3 Protection of scattered employment sites as it adds further unnecessary duplication and development management control to sites and restricts housing delivery.
- Review of other LP policies to determine whether there are positively prepared, effective and will achieve the growth required.

APPENDIX 1
SITE LOCATION PLAN



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-



 Site Boundary

PLANNING

Project
**Bond Road
 Mitcham**
 Drawing Title
Site Boundary Plan

Date	Scale	Drawn by	Check by
27.01.21	1:1250@A3	AB	PJ
Project No	Drawing No	Revision	
32565	AT-P10-001	-	

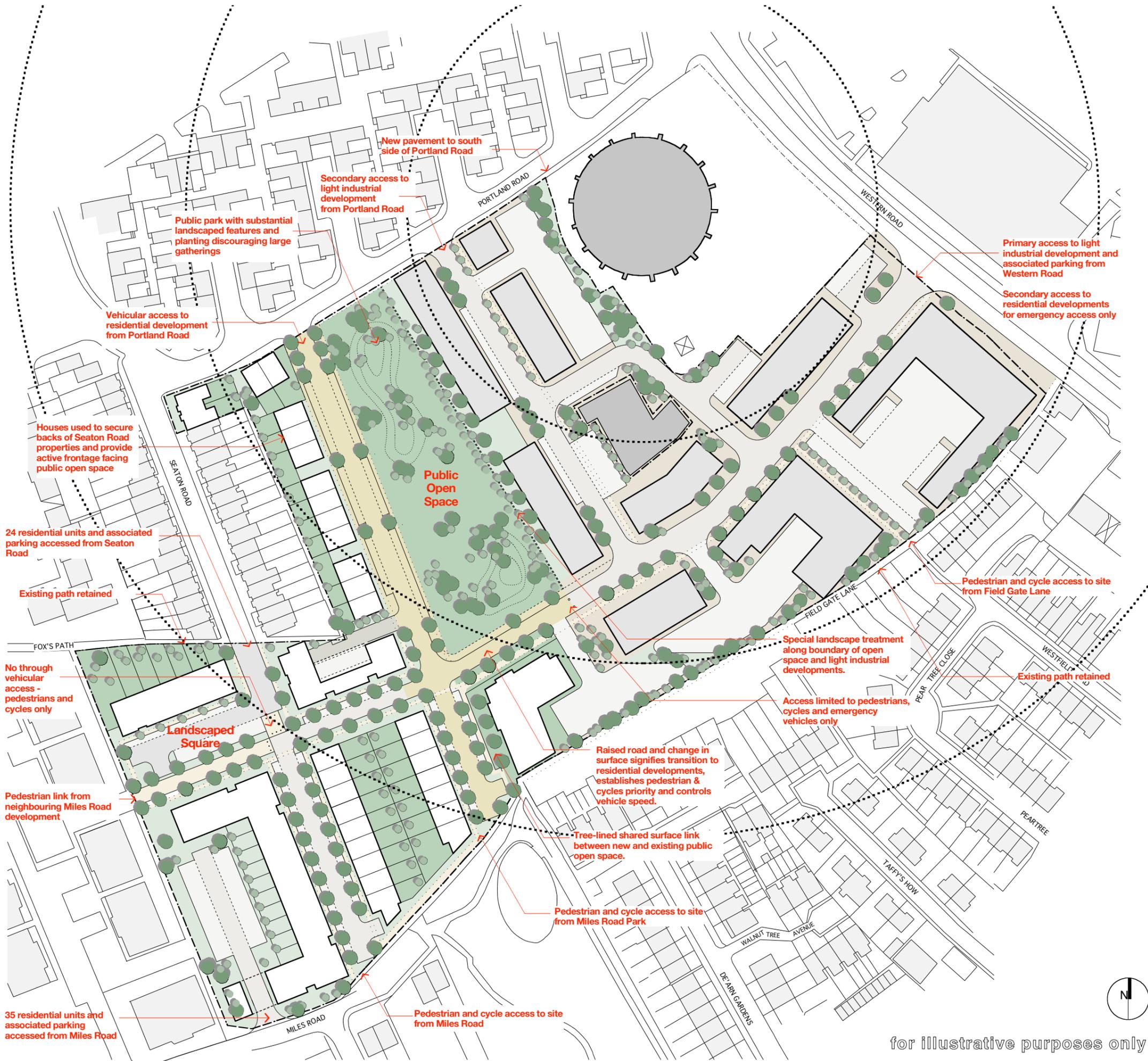
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APPENDIX 2
DRAWING 2081_SK_565B ILLUSTRATIVE LAYOUT



- Residential Developments
- Light Industrial Developments

Western Road Mitcham
Illustrative Layout

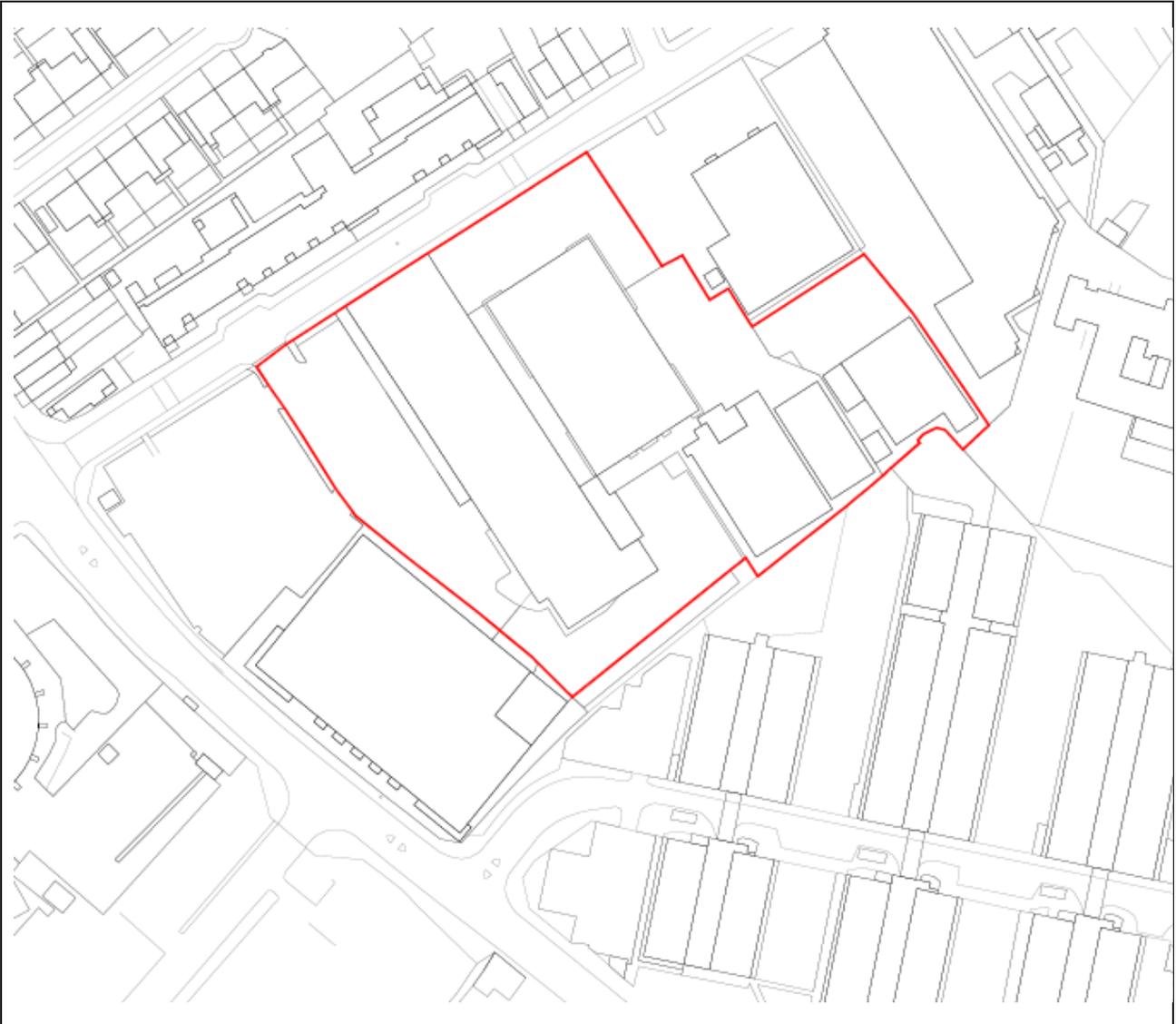
scale	1:1250 at A3	
application reference	06/P0984	
drawing no.	2081_SK_565B	
revisions	-- First Issue.	20.11.07
	A Minor amendments.	04.04.08
	B Layout amended to comply with Health and Safety Executive PADHI guidelines.	02.04.09

National Grid Property
Richards Partington Architects

for illustrative purposes only

**APPENDIX 3
DRAFT ALLOCATION**

BOND ROAD, MITCHAM



Ward: Lavender Fields

Site description: The site is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The site is bound to the west by the Asda supermarket fronting Western Road and to the east a further Cash & Carry building and other employment buildings. The site fronts Bond Road to the north, which is predominantly residential in character. To the South is Sadler Close which is also residential. The existing cash & carry buildings have large building footprints and heights. Customer parking and loading areas are accessed via Bond Road.

Site area: 1.3ha

Existing uses: Sui Generis Cash & Carry and associated buildings, banqueting hall and restaurant.

Site allocation: Residential development.

Site deliverability: In private ownership. Delivery 0-5 years.

Design and accessibility guidance:

The site currently has a poor relationship to Bond Road. Redevelopment of the site would provide an excellent opportunity to enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to Bond Road specifically, the overall surroundings and connectivity to the town centre.

The development must achieve a satisfactory relationship with the adjacent supermarket and employment uses to enable their continued operation whilst not fettering the development potential of the sites in the long term.

Consideration will need to be given to the proximity of the nearby Mitcham Gasworks (Allocation Site Mi16). The landowners of that site are proposing to decommission the gasholder but until that time development within the vicinity of the gasholder is subject to restrictions set out in the Health and Safety Executive's land use planning method (PADHI) which limits the potential for residential-led development in close proximity of the gasholder. This may give rise to layout considerations to a small part of this site should it come forward ahead of the decommissioning of the gas holder. The majority of the site is free from this constraint.

Development proposals must deliver much needed new homes, play space and open space.

The site location

Approach to tall buildings	Redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
Impacts Listed Buildings or undesignated heritage assets	Any tall buildings would need to be considered in the context of the Grade I Eagle House fronting London Road.
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Mitcham archaeological priority zone.
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	No
Is in a town centre	No, however, the site is very close to / from Mitcham town centre.
Is in an Opportunity Area	No, but is falls within the intended Opportunity Area Planning Framework.
Impacts a designated open space	No
Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 3 good access to public transport.