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Dear Sir / Madam

**Representations to Merton's New Local Plan Stage 3 Publication Consultation
Boundary Business Court, Church Road, Mitcham**

Thank you for giving us the opportunity to provide comments on the Council's New Local Plan Stage 3 Publication. I write on behalf of our client, Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited, who have an interest in Boundary Business Court, Mitcham.

Within the Stage 3 Publication we note that the Council is not proposing to designate Boundary Business Court as a Strategic Industrial Location (SIL) or a Locally Significant Industrial Site (LSIS). The site would therefore be regarded as a 'Scattered Employment Site'. This emerging policy position is considered wholly appropriate for the site and is strongly supported by our client.

Below I set out a brief overview of the site and the surrounding context before setting out detailed comments on the Stage 3 Publication document.

Site and Surrounding Context

Boundary Business Court measures approximately 2.4ha in area and comprises 26 industrial units and two office buildings, located approximately 800m to the west of Mitcham Town Centre. The remainder of the site comprises hardstanding used for servicing and car parking. Access to the site is provided from Church Road to the west via two junctions (one to the north and one to the south). An internal loop road links these two junctions and provides access to individual business premises. A site location plan is enclosed with this letter.

The site is bound to the north by Fox's Path, a public footpath linking Seaton Road to the east and Church Road to the west, beyond which sits two storey terrace houses along Sycamore Gardens and Bank Avenue. The site is bound to the east by Collingwood Road, with two storey terrace dwellings here and further east along Rodney Road. The site is bound to the south by the three storey Kingswood House (currently in use as a children's nursery) and a row of two storey terrace houses (with rear gardens) fronting Miles Road. The site is bound to the west by Church Road with two storey dwellings to the east along with industrial land uses along Batsworth Road. The site is therefore considered to be located in a predominantly residential location. The site is located approximately 800m to the west of Mitcham Town Centre, which offers a wide range of facilities and services.

The site does not contain any statutory or locally listed buildings or structures, and there are no listed buildings or structures in the immediate surrounding area. The site is not located within a conservation area or an archaeological priority area. With regards to the Environment Agency's Flood Mapping, the site is located within Flood Zone 1 which represents the lowest risk low risk of river and / or sea flooding.

With regards to public transport, the site has a Public Transport Accessibility Level (PTAL) rating of predominantly 2, with smaller areas of the site ranging from 1b-3. Phipps Bridge and Belgrave Walk Tram Stops

are located approximately 500m to the west and southwest from the centre of the site respectively, providing regular services to Wimbledon to the northwest and Croydon to the southeast. Colliers Wood Underground Station is located approximately 1.5km to the north of the site, providing regular Northern Line services into central London. The closest bus stops to the site are located on Church Road, one adjacent to the site, and one approximately 200m to the south, providing frequent services to Mitcham and Raynes Park.

Comments on the Stage 3 Publication

Scattered Employment Site

Within the Stage 3 Publication we note that the Council is not proposing to designate Boundary Business Court as a Strategic Industrial Location (SIL) or a Locally Significant Industrial Site (LSIS). The site would therefore be regarded as a 'Scattered Employment Site'. This emerging policy position is considered wholly appropriate for the site and is strongly supported by our client.

The flexibility afforded by the emerging 'Scattered Employment Site' policy position will ensure that the site can appropriately respond to market needs and demands in the future by potentially bringing forward alternative uses. This will ensure that the site is used efficiently to meet the need for 'new homes and other uses' as required by the NPPF.

Full & Proper Marketing

Within the Stage 3 Publication we note that the Council has amended Part iii of Policy EC13.3 to reduce the period that full and proper marketing needs to be undertaken for, from 30 months to 18 months. This change is strongly supported by our client. A marketing period of 30 months is considered unreasonable and risks unnecessarily delaying potentially deliverable sites from being developed for an alternative identified need.

Despite the change at Part iii, we note that supporting text to Policy EC13.3 still refers to 30 months. This should be amended to 18 months within the next iteration of the Local Plan.

Ancillary Uses

Whilst the general approach to the employment policies within the Stage 3 Publication is welcomed, we note that no allowance has been made for ancillary uses within industrial estates. Such uses (for example cafes, gyms and crèches) are common place within industrial estates across the country and support the primary function of estates rather than detract from them. They cater for the needs of employees and increase the attractiveness and longevity of estates. They bring with them a range of economic and social benefits and are recognised within many other Local Plans within London.

Given the above, it is respectfully requested that allowance be made within the emerging Local Plan for such supporting ancillary uses. This is considered most appropriate within Policy EC13.2. Like in other Local Plans within London, the wording can be such that it ensures that the uses and quantum are truly ancillary to the primary use, but ultimately the aim is to ensure that policy does not exclude such uses in principle.

Summary

I trust that the above comments are of assistance in the ongoing preparation of the New Local Plan and would be grateful for confirmation of receipt of this letter. The emerging policy position at Boundary Business Court, as set out within the Stage 3 Publication, will ensure sufficient flexibility to respond to market needs and demands in the future.

Going forward we wish to be kept up to date with the progress of the new Plan and we look forward to further opportunities to engage with it. If any changes are proposed to the policy position covering Boundary Business Court we would respectfully request that we are notified as soon as possible.



In the meantime if you have any queries or would like to discuss anything please feel free to contact me or my colleague, Jack Conroy (020 3320 8261).

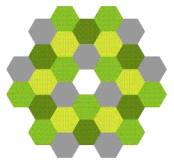
Yours faithfully

Oliver Milne
Associate Director

Enc. As above

HM Land Registry Official copy of title plan

Title number **SGL11246**
Ordnance Survey map reference **TQ2668NE**
Scale **1:1250**
Administrative area **Merton**



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