28 February 2018 L 180228 SAV GLA - London Plan Reps



Sadiq Khan (Mayor of London) New London Plan GLA City Hall London Plan Team Post Point 18 FREEPOST RTJC-XBZZ-GJKZ London SE1 2AA

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Dear Mr Khan

# DRAFT LONDON PLAN REPRESENTATIONS ON BEHALF OF RDI REIT PRIORY RETAIL PARK, COLLIERS WOOD, LONDON, SW19 2PP

We write on behalf of our client, RDI REIT, to submit representations to the draft London Plan.

Our client is the owner of the Priory Retail Park (the 'Retail Park') in Colliers Wood District Centre. The Retail Park occupies a key strategic location within the District Centre and provides an array of retail and leisure uses for local residents.

This correspondence and enclosures provides our representations to assist the production of the new London Plan.

#### **Metropolitan Open Land**

We propose the reclassification of a small section of land at the Retail Park from its Metropolitan Open Land (MOL) designation. As detailed below, this section of land does not meet the MOL criteria and would therefore not affect London's green infrastructure. The reclassification of the land will permit the delivery of a new building that will enhance the vitality and viability of Colliers Wood and provide an enhanced green link along the River Wandle for residents.

We confirm that representations have also been made to the emerging Merton Local Plan in respect of this reclassification and pre application discussions have been undertaken with Merton Council.

#### The Site

The section of land we seek to reclassify is located on the north west boundary of the Retail Park (the 'Site'). It adjoins Merton High Street and is currently occupied by a two sided commercial advertisement structure, palisade security fencing, and soft landscaping. The Site's exact location is detailed on Drawing Ref: 180254/SLP/001A – 'Site Location Plan' at **Appendix 1**. In addition, we enclose a photographic supplement of the existing commercial signage structure and wider surroundings at **Appendix 2**.

The Site is located within the boundary of the Colliers Woods District Centre, as defined by the adopted by the Merton Sites and Policies Plan and Policies Map (9 July 2014). It is therefore a 'town centre' site for the purposes of assessing proposals main town centre uses such as floorspace within Class A.





The Site is currently designated as MOL and Protected Open Space ('**POS**') in the Merton Policies Map. To allow development to come forward therefore, these designations would need to be altered.

#### Assessment Against MOL Criteria

Draft Policy G3 of the emerging London Plan states that for land to be designated as MOL, it must meet one of the following criteria:

- **A.** it contributes to the physical structure of London by being clearly distinguishable from the built up area;
- **B.** it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
- **C.** it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;
- **D.** it forms part of a strategic corridor, node or a link in the network of green infrastructure <u>and meets</u> <u>one of the above criteria</u>. (Our emphasis)

The Site forms part of the built up as it is within Colliers Wood District Centre and accommodates a large two sided commercial advertisement structure. It does not provide open air facilities that serve the whole or a significant part of London. In addition, it does not contain features or landscapes that are of a national or metropolitan value. Accordingly, The Site does not satisfy Criteria A-C for inclusion within the MOL designation.

To qualify under Criteria D, land must form part of a strategic corridor, node, or link <u>and</u> meet one of three preceding criteria. As noted above, the Site does not qualify under Criteria A-C therefore, it fails the second requirement of Criteria D.

Furthermore, the Site does not form part of a functional strategic corridor, node, or link. Policy DM01 'Open Space' of the Merton Sites and Policies Plan confirms that Greens Links should provide access between open spaces to promote walking and cycling. The functional Green Link comprises a linear path running along the River Wandle on the western boundary of the Retail Park. This Green Link provides permeability through the Retail Park to surrounding sites, as well as allowing for enjoyment of the natural environment.

This Green Link route however; effectively ends as it meets the Site. As a result of the advertisement structure and palisade fencing, the pedestrian path diverts from the River in easterly direction to run between the Site and the Kiss Me Hardy building. This less commodious route restricts universal access to approximately 20 metres of river bank. The site is not accessible and therefore does not function as part of a link or chain contrary to the requirements for such designations.

It is clear therefore, that the Site does not meet the criteria for inclusion in the MOL and Green Chain designation. For these reasons, we request that the MOL, Green Chain, and POS designations are removed from the Site.

#### The Proposed Development

The reclassification of the Site as MOL and POS would allow a number of enhancements to the Green Chain. These enhancements would be delivered through a proposal for a new coffee shop building at the Site. The new building would be situated approximately eight metres from the river bank to maintain the openness of the river setting. In addition, the removal of the commercial advertisement structure and palisade fencing will permit the creation of a new linear path to extend the functional Green Link. The development would benefit local residents by enhancing permeability and the scope for enjoyment of the River through new access with external seating areas.

Furthermore, the proposed building will help to integrate the Retail Park with the wider District Centre by creating outward facing commercial floorspace that adjoins the public highway. The proposal would help to activate this part of the site contributing to the overall vitality and viability of Colliers Wood.



The creation of the new coffee shop will assist in meeting a number of local policy aspirations for Colliers Wood. In accordance with draft Policy SD6 of the emerging London Plan, the proposal would:

- Assist in creating a thriving and attractive District Centre;
- Provide an increased range of main town centres, particularly those that will extend evening time activity in Colliers Wood;
- Creation of a more traditional linear building form along Merton High Street; and
- Enhance the visual appearance of the District Centre by replacing an advertisement structure and palisade fencing with a new, well designed building.

Our client has produced some initial scheme design options and we look forward to discussing these with the Greater London Authority.

#### **Colliers Wood**

Our client supports Merton Council's aspirations for the growth and diversification of Colliers Wood's offer. In particular, the provision of new leisure uses will enhance the evening time economy and provide an additional facilities to meet the requirements and expectations of local residents. To assist within achieving these aims, the Colliers Wood District Centre should be included in Table A1.1 'Town Centre Network' of the new London Plan.

The emerging London Plan defines a district centre as:

'District centres – distributed more widely than Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000– 50,000 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.'

Colliers Wood currently provides all the necessary characteristics of a district centre in both quantitative and qualitative terms. It accommodates a 11,000 sq m Sainsbury's foodstore, 9,000 sq m M&S variety store, 15,000 sq m of additional non-food floorspace, an array of cafes and restaurants, public houses, post office, two hotels, a new public library, schools, and places of worship. A significant increase in the residential population of the District Centre is being delivered through the Britannia Point (182 units), Wimbledon Reach (60 units), and Morris Court (42 units) developments. The District Centre is also well served by public transport making it an attractive place to visit, work and live.

It follows that the Colliers Wood District Centre should be included in Table A1.1 of the new London Plan. This acknowledgement of Colliers Wood's new status will assist in attracting further private sector investment to ensure future policy objectives can be achieved over the development plan period.

#### **Summary and Conclusion**

We trust that these representations are helpful and will be taken in to consideration in the finalisation of the document. We would be grateful if you can keep us updated of any further stages of consultation so we can provide comments as may be required.

Should you require any clarification or additional information, please do not hesitate to contact Raymond Tutty or Tim Price at these offices.



### Yours faithfully

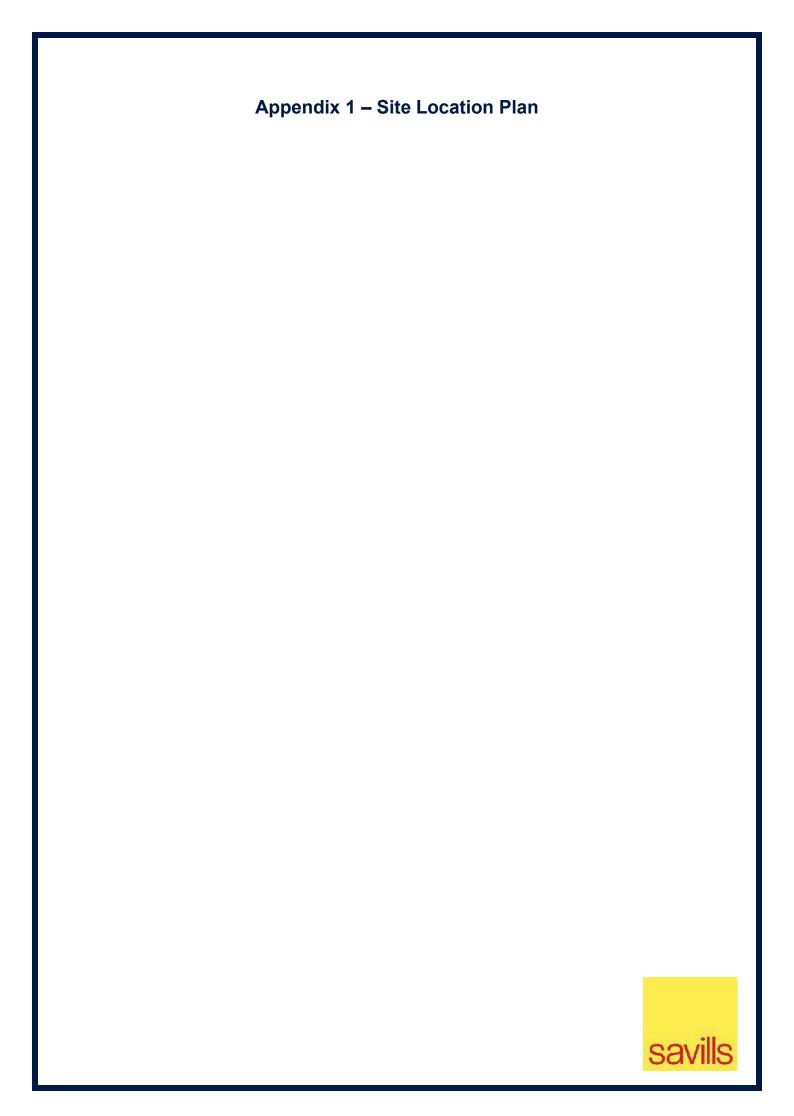


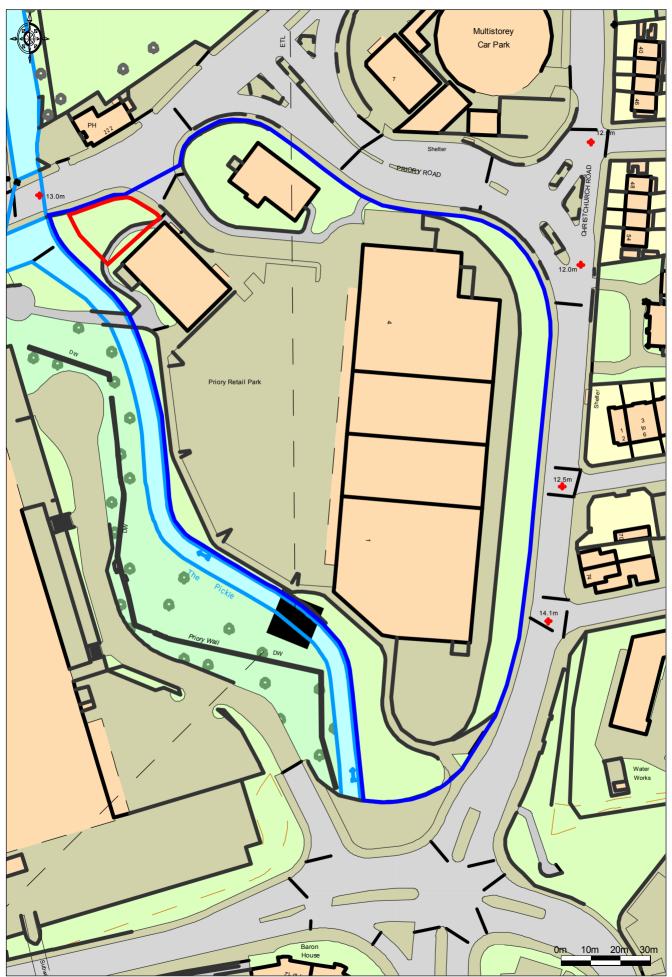
## Savills (UK) Limited Retail Planning

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Appendix 1 – Site Location Plan Appendix 2 – Photographic Supplement







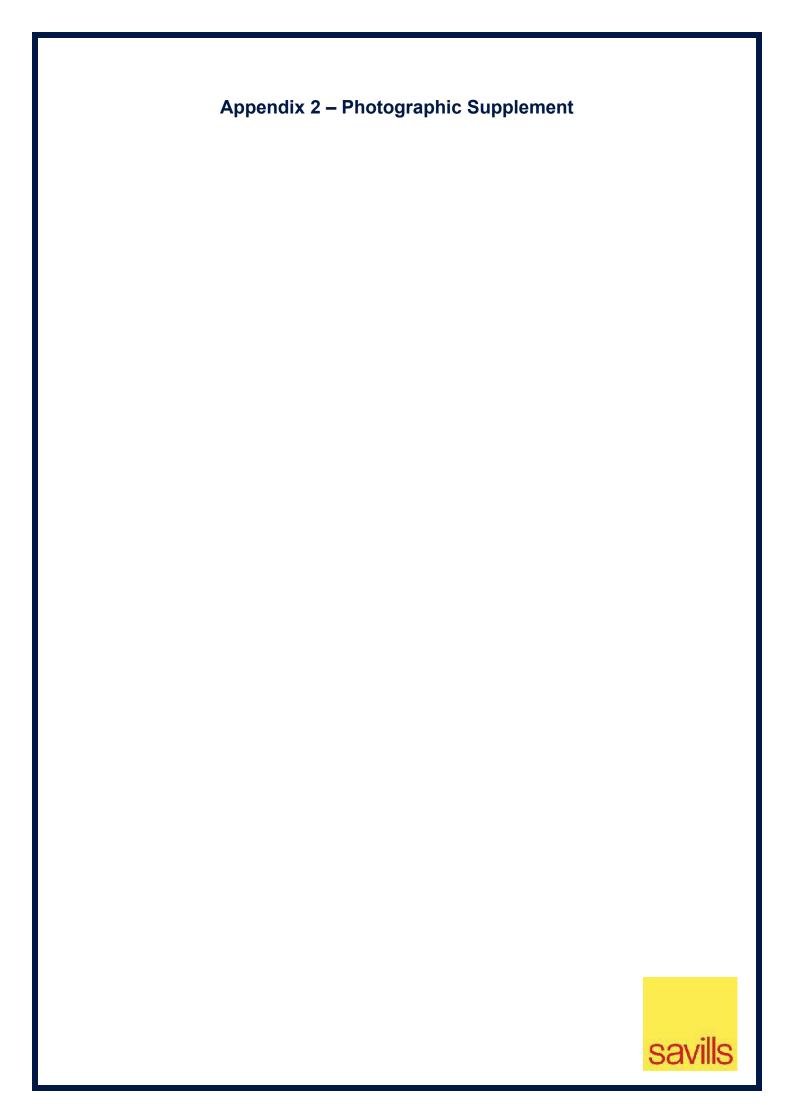




Image 1: Merton High Street Looking North



Source: Google Maps

Image 2: Merton High Street Looking South



Source: Google Maps