

Attention Sabah Halli  
Development Control  
London Borough of Merton  
Merton Civic Centre  
London Road  
Morden  
SM4 5DX

7th October 2015

Re: Planning application 14/P4361: Redevelopment of the Wimbledon Greyhound Stadium

Dear Sabah Halli

The WPRA has considered the Retail Assessment undertaken by the Applicants and does not feel there is any justification for the proposed 1273 sq.m. retail unit for the following reasons;

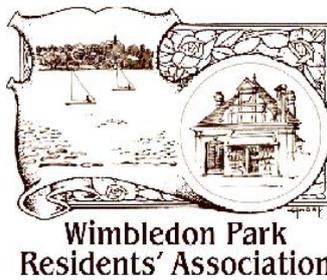
Policy DM R2 of the Merton Sites and Policies Plan relates specifically to development of town centre uses outside of town centres. It states that the scope of the sequential test and impact assessment submitted must be proportionate to the scale of the development proposed. It also states that local convenience development outside of town centres should meet the following criteria:

- i. The proposal will be a replacement for an existing convenience shop;
- ii. The proposal will meet local needs in an area identified as deficient in local convenience shopping (including convenience retail activity in petrol stations);
- iii. The overall floorspace of the local convenience shop (including petrol stations) would not exceed 280 sq m net retail floorspace.

**Taking these each in turn**

- i. **The proposed retail unit does not replace an existing convenience shop**
- ii. **Contrary to what the Applicants have suggested, the area is not currently deficient in local convenience shopping. The fact that the Applicants are unable to name a potential operator would perhaps indicate a lack of demand from convenience retailers. In consideration of the need for additional convenience shopping to support the proposed housing, additional convenience shopping floor space is already proposed elsewhere within the 5 minute isotope although we note the Applicants ignore this in the Retail Assessment. The Applicants have failed to acknowledge or take into account, the planning consent (14/P3578) granted by Merton Council for 405 sq m of convenience retail on the former Haydons Road filling station site. A further application was submitted in June 2015 by Blackrock (81/15P2464) to broaden an existing retail planning consent at Plough Lane Retail Park to include food retailing on 1073 sq m. This application is being made with a specific operator in mind, Lidl and the location is opposite the stadium on Plough Lane.**

- iii **The proposed retail floor area exceeds the DM R2 guideline concerning size by 993 sq m.**



3.9 Based on the local and national planning policy framework, the principal policy considerations relevant to the proposed retail floorspace are:

- The Sequential Approach - Whether there are any sites located in sequentially preferable locations that are available, suitable and viable to accommodate the proposed retail unit; and
- Impact - whether there is clear evidence of 'significant adverse impact' on any of the defined centres within Merton or the adjoining Borough of Wandsworth.

The Applicants fail to consider or acknowledge the local independent convenience retailer, Yalini, located at the corner of Plough Lane and Haydons Road. This shop lies directly between Haydons Road railway station and the Applicantss' site and provides a very extensive range of convenience food shopping for local households. We note the Applicants have not acknowledged Yalini's existence in the retail assessment.

Yours sincerely