

Future Merton  
London Borough of Merton  
12th floor Merton Civic Centre  
London Road  
Morden SM4 5DX

24<sup>th</sup> July 2012

**Rainbow Industrial Estate / Local development Framework**

Dear Sirs,

We are writing in response to the consultation in respect of the Rainbow Industrial Estate. The industrial estate was shown in the Raynes Park Local Centre Enhancement Plan 2009-2011 as RP2. It is clearly an important part of Raynes Park and specifically at its interface with the interchange south of Raynes Park station where buses, rail passengers and car drop off and converge adjacent to the industrial estate entrance

It was shown as part of the Local Centre Enhancement Plan although it has now been shown as removed in the LDF draft plan on which we have written separately.

In the May 2012 LDF Proposal Map the Rainbow Estate is designated as a Locally Significant Industrial Estate. If Merton is of the view that this is the correct designation for the site, non industrial uses such as housing should not be contemplated on the site and the Council should not be seen in collaboration promoting a non confirming land use.

The Council should be engaging with Workspace to give every assistance in ensuring the site offers accommodation to meet the diverse industrial needs of local businesses. If Workspace does not believe industrial uses are viable and want to sell the site, this raises the issue of alternative uses.

If the Council is reverting to the site designation in the Local Enhancement plan as a development site, and if it is concluded that there is an absence of viable employment uses for the site, it must be considered as an opportunity site for a number of uses. If this is the case, the Council needs to evaluate what are the other uses serving local needs that the site could serve.

Housing is only one option for the site There needs to be an evaluation to assess how much housing can be provided on this site with its constrained entrance and traffic movements, the

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adverse impact of railways on three sides and the retention of some Network Rail premises. Other options such as education provision to address the pressure on local schools may also be worthy of consideration.

The situation which currently exists and which is clearly unsatisfactory is a housing scheme for the majority of the site, suffering from all the difficulties of site planning as previously noted but which also contains low viability industrial uses in its core. This is being promoted by Workspace, which is not a residential developer, apparently with the support of the Council . A core of industrial uses of questionable viability is not an ideal neighbour for a high quality housing scheme. If these industrial uses were viable the whole scheme could be redeveloped to meet employment demand which is Workspace's core activity.

A preferred approach is clearly for the Council to work with Workspace in accordance with the provisions of the LDF to promote diverse employment uses. This can be a collaborative approach in meeting the Council's LDF aspirations.

Alternatively, if employment uses are marginal in their viability and the designation in the LDF is not a realistic land use in the future, the Council should define alternative uses for the whole site to meet local needs in consultation with local residents and stakeholder.

We regard the current situation and proposals as unsatisfactory and lacking in strategic direction for the site which risks neither delivering employment opportunities , nor a housing scheme without a number compounded constraints, nor other uses of use or benefit to local people. We would therefore urge the Council to avoid compromised and confused site planning and decide a way forward which meets local needs.

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Director

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