

From: Fischer. P

COMMENTS ON THE DRAFT 'SITE AND POLICIES DEVELOPMENT PLAN' DOCUMENT AND SITE PROPOSALS MAP Stage 3 Public Consultation

Re Section E: Raynes Park

Map E2.1, p496.

Whilst I am pleased to see that the council is now proposing to include an area south of the railway in the Raynes Park Local Centre within its revised local centre boundary subsequent to representations to the previous consultation phase in 2012, I am concerned that what is now proposed still does not extend far enough.

On the south side of the railway and in the vicinity of West Barnes Lane I submit that it should extend at the very least to the extent that I put forward in 2012* (see attached plan re-submitted) and logically it ought to extend to the extent of the council adopted Raynes Park Enhancement Plan area** (extract from Place Design document attached) as although partially implemented, much of the enhancement plan, particularly on the south side of the railway has yet to be carried out when funds become available.

* My 2012 proposal showed that the boundary should extend to include the Rock Restaurant (formerly the Junction Tavern) and the commercial parade opposite it, thus including two key bus stops that host three bus routes that serve the local centre on the south side of the railway. It is illogical and likely to have a long-term adverse impact if this section is excluded.

** I also believe that a strong case can be made for the local centre boundary being made contiguous with the adopted Raynes Park Enhancement Plan as the area's local facilities and commercial extent are likely to need to increase in the next decade to support the extensive amount of additional residential accommodation that has been built and is being encouraged and permitted by the council in the Raynes Park area. Any such pressures need to be considered in conjunction with the long term enhancement plan proposals for the area and so a contiguous boundary would be preferable.

It also seems illogical to have a small separate local centre envelope for part of Durham Road. If the enhancement plan boundary were followed then this area would be connected with the main local centre.

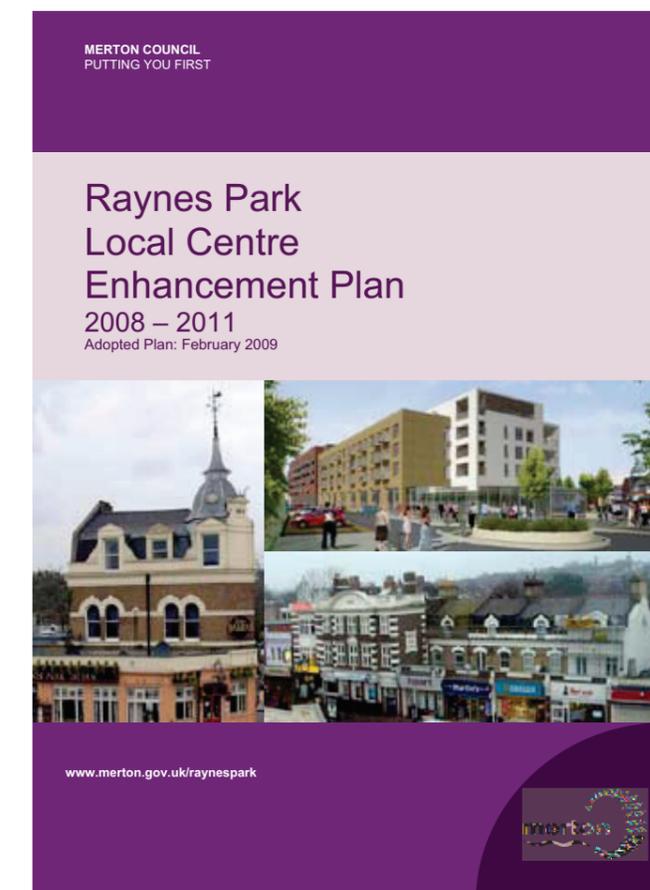
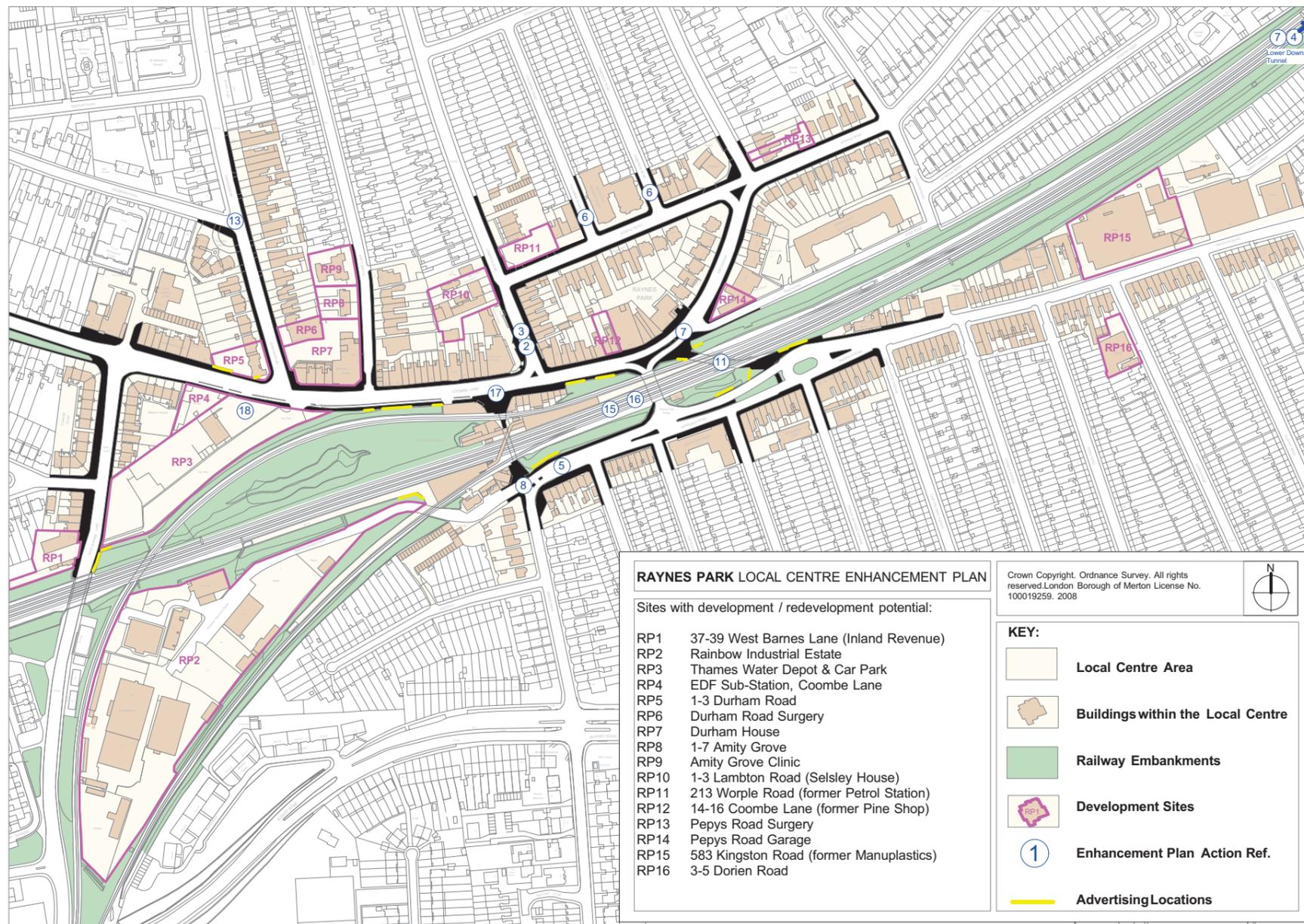
Introduction

Merton Council has published proposals for Local Centre Enhancement in Raynes Park. This work has followed consultation with various groups and residents to establish priorities for the future. It has also carried out a borough wide assessment of the public realm.

The first part of this assessment was a critical evaluation of the existing public realm. This report identified various failings in the borough which provided a basis for improved approaches to design in the public realm.

The second part of this assessment considered the street scene and made recommendations in respect of aspects such as paving finishes, street furniture and improved approaches to civic design.

This report builds upon this work and shows how these borough wide initiatives can be applied locally in Raynes Park.



Raynes Park Local Centre Enhancement Plan. Available at www.merton.gov.uk/raynespark



UDP 2003 boundary should be retained & enlarged as indicated

May 2012

LDF Proposal Map

Local Centres

RAYNES PARK

Add to Local Centre area.

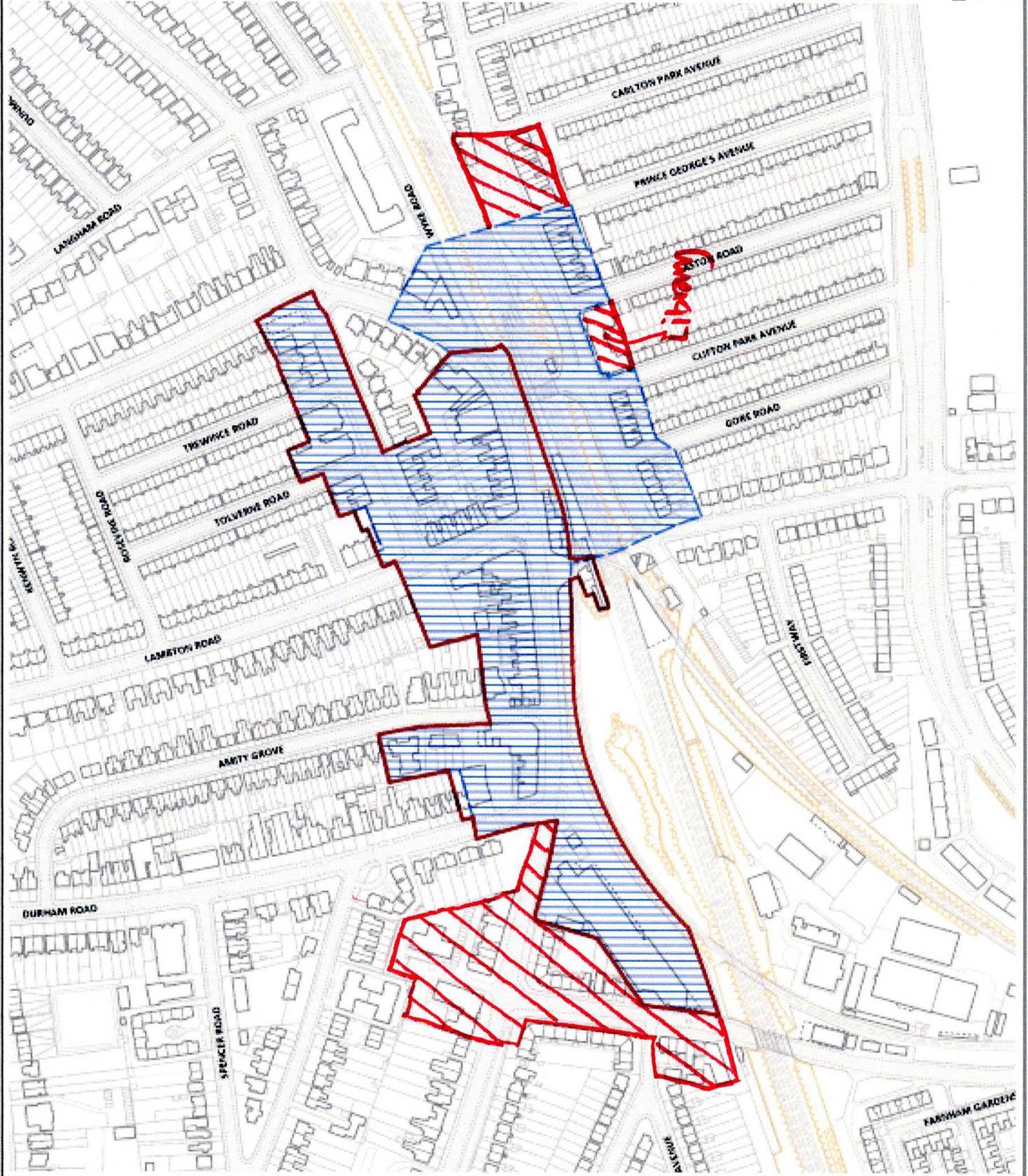


Key

Old Centre Boundary LDF 2003

New Centre Boundary LDF Proposals 2012

London Borough of Merton
 Merton Civic Centre, 100 London Road,
 Morden, Surrey, SM6 5DX
 Tel: 020 8543 2222



Site Proposal 41: Kingston Road Opposite Lower Downs'

I object strongly to the council planners preference for this site to be allocated for housing use.

This site has been an open space of visual importance for over 80 years, despite its mundane use for advertising and lack of public access, in an area that is acknowledged by the council to be deficient in public open space for amenity use by Merton residents. To help remedy this deficiency, as has already been made clear in the previous LDF consultation in 2012, local residents believe this site should be reserved for use as a small park until such time as funding can be obtained to make this possible.

To propose more housing on a site and make a public open space deficiency even worse when it could be alleviated is not only illogical but indicates that the council cares little for maintaining let alone improving the amenity of the borough. So much for Andrew Judge's words in the introduction to the adopted LDF that *'The Core Planning Strategy is our way of ensuring our aspirations for a Merton that offers a good quality of life to all its residents through responsible planning, becomes a reality.'*

Apart from the importance of maintaining this site as open space, it is on the corner of a busy and awkward road junction and vehicular access and servicing would be both difficult and dangerous. In addition, the council's transport planners have already made formal objections to a nearby apartment planning application on the grounds of difficult access and unacceptable parking pressures in the area. Those reasons were one of the issues on which the application was refused. One presumes that such objections would carry even greater weight with regard to a site at such a busy junction.

Finally, it is a surprise to hear that J C Decaux are owners of the site. Advertisers do not normally own sites, they merely pay the land/property owner rent for the right to place their adverts. Presumably the council have had sight of the legal documentation that shows them to be the owners. Local knowledge of the history of the site indicates that it was originally owned by London Transport (so was now assumed to be owned by its successor, Transport for London), and from what I have heard, until recently there was no apparent Land Registry record to show a change in ownership.

Representation regarding E.5 Raynes Park - Open Spaces

There needs to be a paragraph added to make it clear that as the definitions of 'open space' that are being used cover a *'broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted'*, the basis on which open space deficiency for general recreation will continue to be assessed will be based solely on fully publicly accessible open space.

The reasons for this are that some open spaces such as Prince George's Playing Fields are privately owned and not available to the public for

unrestricted general recreation. This particular site is wrongly shown on Figure 21.1 Merton's Open Spaces in the adopted LDF Core Strategy as being 'publicly accessible'. Whilst some members of the public have access to play football (for which they pay) and to car boot sales or fun fairs that the owners arrange (for which they also pay), this is not a site that the public can use for general recreation. There is, for example, no public access point along the northern edge of the site on Bushey Road through which the public can access the site, the owners quite specifically preventing access.

Site no.74: Southey Bowls Club

1. The government proposes that all development must be 'sustainable'.
2. It is unsustainable to continue proposing residential development on existing private open space, which must inevitably lead to increasing numbers of residents having to commute further to ever fewer recreation facilities, public or private. This will inevitably increase travel by car or public transport, which in turn will increase levels of energy consumption and pollution, making it increasingly difficult if not impossible to meet government targets for reducing both energy use and pollution. Residential use on this site is therefore unacceptable.
3. Even if only part of the site is used for residential use and the bowling green is retained, the location is inappropriate for residential use on both servicing and emergency access grounds. It is also not clear how the council would allocate the site to ensure that the bowling green would be retained and protected if that is the intention.
4. The primary consideration, if there is to be a change of use from private recreational use and the owners of the site, the Bowls Club, chose to close, should be public open space and/or community use. In the past the surrounding area has been acknowledged by the council to be deficient in public open space. The use of this site for public open space should be considered on planning grounds regardless of any arguments about whether or not funding might be available currently.
5. Vehicular access to the site is width restricted, the only access being close to the complex junction of Kingston Road, Lower Downs Road and Burstow Road and servicing vehicles do not enter the site.

Site no.77: 26 Bushey Road

1. The government proposes that all development must be 'sustainable'.
2. It is unsustainable to continue proposing residential development on existing employment land which must inevitably lead to increasing numbers of residents having to commute further to ever fewer employment sites. This will inevitably increase travel by car or public transport, which in turn will increase levels of energy consumption and pollution, making it increasingly difficult if not impossible to meet government targets for reducing both energy use and pollution. Residential use on this site is therefore totally unacceptable.
3. There is a demand for industrial land uses such as this site provides currently, which the occupancy levels by existing tenants demonstrates. There seems to be a lack of understanding by planners that the sort of uses on the site serve a local need, otherwise they would not be there. Trying to freeze them out and move them to supposedly less visible locations only inconveniences the tenants and their customers. Planning policy should recognise that such uses are necessary.
4. The primary consideration if there is to be a change of use from employment use should be community use. In the past the surrounding area has been acknowledged by the council to be deficient in public open space. The use of this site for public open space should be considered on planning grounds regardless of any arguments about whether or not funding might be available currently.