

**From:** On behalf of the Raynes Park and West Barnes Residents' Association

**COMMENTS ON THE DRAFT PLANNING BRIEF, "RAINBOW INDUSTRIAL ESTATE, RAYNES PARK"**

**THIS EMAIL IS SUBMITTED ON BEHALF OF THE RAYNES PARK AND WEST BARNES RESIDENTS' ASSOCIATION IN RESPONSE TO THE PUBLIC CONSULTATION**

As part of the public consultation process, the Raynes Park and West Barnes Residents' Association submits the following comments on the above document. (Referred to below as "the Document.")

1. It is recognised that the Council may make savings by obtaining free services; but such a strategy should not allow companies to present their own business objectives as though they also represent the views of Merton Council. As one might expect from a developer, the Document is written so as to cast the developer's intentions in the best possible light. Thus, by presenting the Document as the Council's own, the Council is open to criticisms of bias, misrepresentation and of acting as a servant of the developer, rather than a servant of the public. The Council should heed the proverb, "**He who pays the piper, calls the tune**".

Worse, the Industrial Estate now seems to have entered a period of wilful neglect, with premises falling vacant and the consequent loss of jobs. This may of course be due to the current recession. However the Council's decision to give its encouragement to the developer's plans must raise the question of whether it is also culpable in the recent loss of these jobs from the Borough.

2. We also do not accept the argument that the Document's is good enough to provide a vehicle for the public consultation process; as there are various errors and omissions, which invalidate it as a balanced basis for consultation.

2.1. **Job Opportunities.** The Document states the scheme would double employment opportunities on the site from approximately 50 to 100. The Association considers that these figures to be unreliable and fail to substantiate the claim that the proposals would lead to an increase in employment on the site.

2.2. **Alternative Schemes.** The Document and FAQ's available on the website omit any discussion of alternatives for the site. Whether or not such alternatives might be viable, such an omission serves to mislead, by focussing, as it does, only on the developer's proposals. This is exacerbated

by the references to two options of height for the development, which further divert attention away from any wider discussion on alternatives for the site.

For example, the most obvious alternative would be to upgrade the site completely for business, commercial and/or industrial uses. This would create many more job opportunities.

**The Document is therefore wholly deficient in the consideration of any alternatives, other than the developer's objectives.**

2.3. **Impact on Local Roads.** The Council's FAQ document also states there is a chance to change the impact on local roads. First, resolution of this problem is thus merely left to "chance"; not even declared as an objective. Second, even if the proposal to limit on-site parking were ultimately to limit car-ownership; it would, at best, only mitigate the scheme's potential impact on local roads, not "change" the impact.

Using the car parking standards for London and applying these to the 250 dwellings of the specified sizes, indicates a residential car parking requirement of 275 spaces. The allocation to residential, as stated in the Document is (125 total, less 40 business) 85 spaces. This would leave approximately 190 cars seeking spaces off-site. Thus, even if some homes were not to possess cars, there would still be a considerable overflow. Therefore the "chance" to change the impact on local roads is virtually non-existent. **In fact the opposite is far more likely. The chances are that parking in nearby roads outside CPZs will be placed under more pressure.**

**This FAQ is thus misleading. Its choice of words seems purposely to obfuscate, and, as such, is not appropriate within a Council publication.**

2.4. **Pressure on Infrastructure.** Many residents have voiced concerns over the large number of new homes in the Raynes Park area and the pressures these have put on roads, water supplies, drainage, GPs, dentists, school places and the like; a concern the Association whole-heartedly endorses. However, the Council's attitude seems to be that an S106 agreement (or its successor, the Community Infrastructure Levy) would help alleviate these problems. However, only a few of the foregoing concerns fall within the Council's remit. Also, the Levy can only be spent to mitigate the impact of the new development, not to tackle the existing problems. Third, many of the remedies required would have long lead times. Fourth, there is no guarantee that such levy income would be spent in Raynes Park.

**Thus again, the Council's documentation misinforms.**

3. At the Raynes Park Forum, held on the 21 June 2012, council officers implied certain matters in their responses to questions from the floor. However, these are not borne out by the information within the Document. viz:

3.1 *The inference that it would be necessary to include residential development to enable the redevelopment of the industrial elements.*

This is not demonstrated within the Document. In any case, such a statement would be inadmissible. Workspace is a commercial enterprise. If it desires to improve its assets, it should do this through the normal business practice of raising either additional capital or debt. If it cannot or does not wish to, perhaps due to financial difficulties, it is not the purpose of the planning system to aid the financial shortcomings of private business.

3.2 *The suggestion that the residential development is necessary to enable the proposed improvements to the access at Raynes Park Station.*

Again, this is not demonstrated anywhere within the Document. In reality, it is likely that the cost of improving the access would be only a miniscule portion of the huge profit that Workspace would make from change of use to 250 residential units.

3.3 *The inference that no decision has been made in relation to onsite parking.*

The proposal clearly states there will be circa 125 car parking spaces, of which 40 will be allocated to business use.

3.4 *The statement that the proposal includes "some" residential elements.*

The proposal provides for 3,390 sqm of business floor space, (which is approximately equivalent to the existing covered industrial space), whilst the layout and section drawings, combined with the objective of 250 dwellings, indicate approximately 26,000 sqm of gross residential floor space. Further, the allocation of site land-use is approximately 1/3 business, 2/3 residential. Thus, the proposal is heavily skewed in favour of residential development. This Planning Brief is therefore really to allow a change of principal use from industrial to residential.

4. The Association therefore considers the proposed planning brief completely unsound for the Rainbow Estate, for the following reasons:

4.1 The Document, as a basis for the Council's consultation with the public, is biased and flawed for the reasons already given in Sections 1 and 2. This apparent bias is further exacerbated by the tenor of the Council's clarifications, as shown under Section 3, above.

4.2 We consider the site wholly inappropriate for such a large residential development for the following reasons:

a) The site is completely cut off from the outside world apart from a single and restricted access point under the railway line. This means emergency access to the site is extremely limited. Additionally, it is proposed to locate homes at the far southern end of the site, behind a wall of business units. These units are likely to be unoccupied at weekends and public holidays and

may well represent several risks to the residential properties, including fire, chemicals and other hazards.

b) The site is surrounded by railway lines, with concomitant nuisance, noise and vibration. This is further exacerbated by public announcements at the nearby station, wheel squeal from trains negotiating the tight bends and brake dust.

c) Such a large development will put even greater strain on the area's already inadequate infrastructure, for which the Council has no realistic remedy.

d) Such a single restricted access to 250 dwellings is a disaster waiting to happen. For example, suppose the access road is temporarily closed, perhaps due to utilities' excavations or, say, Network Rail has an emergency or maintenance works at or near the station and has to site a large crane in the access road close to the bridge; and then a fire breaks out in the flats. There would be no emergency access whatsoever. It is from such combinations of events that disasters are made.

For comparison, in the 1970's, when the "Apostles" were closed off from Bushey Road to create cul-de-sacs of 100+ houses each, alternative access was still maintained at their southern ends, for the emergency services.

4.3 The car parking provision is grossly inadequate.

4.4 It is doubtful that the proposed development would bring more job opportunities to the area.

4.5 The proposal is really to allow a change in the principal use of the site from employment led uses to residential.

4.6 The necessary massing of the residential units would be out of keeping with the surrounding buildings, including the neighbouring blocks of flats, such as Bushey Court and the houses in Firstway

Please advise me and the Association of the outcome of this consultation process.