

Re: Appeal by Redrow Homes

Site Address: 265 Burlington Road, London, KT3 4NE

in the London Borough of Merton

Planning Inspectorate Reference APP/T5720/W/20/3250440

PROOF OF EVIDENCE IN REBUTTAL

Submitted by

THE RAYNES PARK AND WEST BARNES RESIDENTS' ASSOCIATION

NOVEMBER 2020

1. My name is John Elvidge and I make this statement from my own knowledge on behalf of the Raynes Park and West Barnes Residents' Association which has been granted Rule 6 status in this Inquiry. I have been the Chairman of the Association for 20 years.
2. I practised at the Bar for 35 years, and then sat as an Immigration Judge for 10 years. I also sat as a Recorder for the last 20 of these years hearing criminal, civil and family cases.
3. I am a former Leader of Merton Council and was a Councillor for 16 years. As such I have a wide experience in planning matters, but I do not have any professional planning expertise.
4. I will not repeat in this statement the technical planning objections which we set out at length in our objections to the application, and in our Proof of Evidence, which I ask the Inspector to accept.
5. Although the Association has a membership of 1800 households, we are not able financially to provide expert evidence from our own resources. We are content, however, to rely in part on the expert evidence adduced by the London Borough of Merton, and we note that much of its proofs of evidence largely reflect our own concerns.
6. Rather, I would like to give a personal perspective of the proposed development from the point of view of the residents, over 500 of whom made individual objections, and who filled the Council chamber when the application was determined by the Planning Applications Committee.
7. The residents are totally opposed to the present development. We held a public meeting in a local church hall, which was so full that some people had to listen from outside. There were some 250 people present.

8. Before the application was lodged, representatives of Redrow (about 10 of them) came to the Association's Committee to discuss their intended proposal with us and the local ward councillors. We made clear to them at that time that the major concern that local people had was with the height, scale, and massing of the scheme which would inevitably result in massive visual intrusion, but also with the effect on local facilities. We stressed that we were not opposed to using this site for housing, but that it needed to be scaled down considerably in height and density to be acceptable. It was totally out of keeping with the interwar low storey housing in the whole of the area. The tall blocks would dominate the visual landscape for many streets, as can be seen from the photographs we have provided.
9. We note that the original design was placed before the Design Review Panel which "red flagged" it. This is a body which includes some well respected architects. We put the Appellant to proof of how the present scheme differs from that which was so roundly rejected, and why it was not placed before the Panel for further consideration before the application was made. We are also surprised that the Council's planning officers did not insist upon this being done. The omission is not properly explained in the Planning Officer's report to the Committee.
10. It remains our view that the site has the potential to be developed for housing, but on a much reduced scale.
11. Ideally, we believe that, as the Council's own planning guidance suggests, the whole of the Tesco site, including the store, could be redeveloped. We understand that this may well be outside the remit of this particular appeal, but we set out our views just the same. The store, which is a valuable and much wanted local resource, could be re-built with accommodation above, as in the successful Waitrose development in the centre of Raynes Park. Any buildings higher than 4 or 5 stories should then be built next to the flyover. The design should allow space for a children's play area, including that for older children, and for a much needed medical facility, as well as some greenery.
12. The area is not well served with public transport, nor are there any shops, except for Tesco's in the area. While it may be possible for an able bodied person physically to walk to Raynes Park Station or Motspur Park Station in the times suggested by the Appellant's expert, this would not apply to anyone who is elderly, or who has young children. Many of the intended residents would be in these categories.
13. Although the proposed scheme limits the number of cars, we expect that many residents of the flats will have a car, and we note that the car parking provision of 220 spaces is below the recommended level. Many residents will inevitably park in the surrounding streets, which are often already full to capacity. The suggestion of paying for a CPZ in surrounding streets is a clear indication that neither the Appellant nor the Council expect the provision to be adequate. It is not acceptable that the residents of those streets will almost certainly be faced with the need to buy a parking permit in a new CPZ, simply because the housing development is so large that it cannot provide the recommended level of parking capacity.
14. Burlington Road is blocked by traffic for much of the day owing to the proximity of the West Barnes level crossing, where the gates can be down for 10 minutes at a time to let up to

three trains through. This has a serious effect on the operations of the local commercial enterprises.

15. We are disappointed that the application was not refused also on the grounds of flooding. The area is prone to flooding, particularly flash flooding, and there have been many instances over the years. Indeed, the Residents' Association was formed in 1928 because of concerns over flooding to the extensive housing being developed during the interwar years. We have supplied photographs of a recent instance of this.
16. We are disappointed also that the application was not refused also on the grounds that the application fails entirely to comply with the Council's own policy on CO2. We have demonstrated in our Proof of Evidence that the development proposed is so large that it does not begin to do so.
17. We respectfully ask that the appeal be dismissed.