

COMMENTS ON THE PLANNING BRIEF “RAINBOW INDUSTRIAL ESTATE”

THIS EMAIL IS SUBMITTED ON BEHALF OF THE RAYNES PARK AND WEST BARNES RESIDENTS’ ASSOCIATION IN RESPONSE TO THE PLANNING BRIEF AND ASSOCIATED DOCUMENTS ISSUED IN JUNE 2013

The Raynes Park and West Barnes Residents’ Association (the Association) is pleased to have the opportunity to respond, as invited by the London Borough of Merton’s website; “Have your say - Rainbow industrial estate planning brief (until 20 July 2013)”. We therefore submit the following comments on the above Planning Brief and supporting documents. (Referred to below as “the Documents.”)

1. The Planning Brief is for a Change of Use.

Our objection to the “final” Brief is similar to that of the “draft” Brief, namely that it envisages development which cannot be regarded as sustainable. The site was designated for and clearly is ONLY suitable for light industry and storage use and is UNSUITABLE for any residential development. The Planning Brief contemplates, for the first time ever, adults and children living and sleeping on the site, as against people just working there. This would be a VERY SIGNIFICANT CHANGE OF USE.

2. The format of the Brief is incomplete and lacks clarity.

There should be distinct Sections setting out:

- Council Aspirations ,
- Council Requirements,
- Constraints on redevelopment,
- Alternative Options for the site,
- Planning Obligations and consequential Infrastructures requirements .

3. Site Constraints

The Documents should fully address the very severe constraints on redevelopment of the site:

- The single access point with NO viable scope for alternative vehicular access,
- The proximity of the railway Station and lines (eg noise from trains announcements, brake dust and wheel-squeal, plus serious overlooking from the station platforms and trains.)
- Whilst the railway bridge has an height restriction, it also has a road width restriction, with NO scope to increase the width.
- Contamination from many years of industrial use.
- Potential vehicle congestion at the entrance to the site at peak morning and evening times.
- Potential risks due to limited access for emergency services.
- The access to the site being owned by Network Rail.

4. Financial Justification

The Documents imply that a residential development of up to 250 dwellings is necessary financially to enable the employment uses of the site. However, this is still not demonstrated, although being the subject of the Capita Symonds “Second Opinion Viability Report”, commissioning by LBM. In fact, Section 14 of the Second Opinion states that a case could be made for the developer’s profit margin to be less. It should be noted that the report does not state what the developer’s profit is actually calculated to be, either in quantum or percentage terms.

This report also states (Section 12) that the London Mayoral CIL (£35/sqm) is overstated due to the existing floor area not being deducted from the calculation. This saving would thus go directly to the

developer's bottom line. Hence, this would make the case for the developer's profit being too high even stronger.

Previously, it was suggested by this Association that the financial viability should begin with a "Zero Base", by assuming zero residential space (i.e. 100% Employment uses) as a base case; and then work out how much residential space may (or may not) be reasonably justified to enable a commercial development. It is evident this approach has not been used.

The evidence therefore points to the Planning Brief creating a developer's profit that would be too high.

5. Concerns over the Site Access and Proposed Kiss and Ride Facilities

The Design Report, Section 3 (Figure 6) shows the proposed Kiss and Ride arrangement adjacent to the South entrance to Raynes Park Station. These proposals are not materially different from the draft Brief.

This Association considers the proposed arrangement as being seriously flawed in a number of road safety aspects.

- Safety for pedestrians –no provision for segregated access to the proposed dwellings
- Necessity for all pedestrians to cross Network Rail's vehicle access, in order to reach the dwellings.
- Poor and dangerous sight-lines close to and under the railway bridge
- Narrowing to a pinch-point of the only pedestrian access, right next to the mini-roundabout.
- The edges of the mini-roundabout being located tightly against the boundary fences of adjoining properties. This will, in practical terms, reduce the workable diameter to less than the allowable minimum of 12m.
- Traffic crossing over the mini-roundabout as it enters Rainbow Estate, will tend to take an anti-clockwise route,
- Conflicts at the entrance between vehicles dropping off and/or collecting passengers and pedestrians crossing from the Station into Grand Drive.

We therefore consider such a K&R facility within such a very confined area would be neither a SAFE nor a VIABLE concept, not only in the location proposed but also ANYWHERE within the entrance to the Rainbow Estate (ie anywhere between the bridge and Grand Drive).

6. Concerns over Massing

Figure 6.2 in the Brief illustrates the most southerly building as a block, six stories high. A comparison is drawn with Bushey Court (4 storeys plus a pitched roof) and the Waitrose development (3 to 4 storeys, plus a stepped back fifth storey). The proposed development is plainly more massive than these and also out of proportion to other buildings close by, such as the Carters Estate (2 storeys) and the offices in West Barnes Lane (3 storeys).

Regards

Jerry Cuthbert & David Freeman

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

Questions

1. The potential 'application site' currently has 3,400 sq.m. of industrial/storage floorspace. The aspiration is to provide no more than the same area of SME/office floorspace. What is the rationale for conducting a viability study to justify the proposed quantum of residential development if there is NO INCREASE in the amount of employment floorspace and no guarantee or even estimate of the number of NEW JOBS which are expected to be created ?
2. Why does the Brief not state the number of people normally employed by the site and estimate the number of additional jobs expected to be created ?
3. Why does the Brief not set out fully the investigations into the scope for an alternative vehicular access to the site ?
4. Why are the constraints on development not set out clearly and fully in the Brief under one Sub heading ?
5. Why does the Brief not set out fully in one Section the consequential infrastructure requirements which would be expected to flow from an additional 250 dwelling units ?
6. Based on 250 DU's the probable number of residents living on the site could exceed 500 of whom approx. 200 would be children. Why is there no reference in the Brief to the estimated number of children of school age who would need educational provision ?
7. Why in Section 4 of the Brief (Dev. Plan Policies) is there no reference to Education Assessment under the heading Community Facilities ?
8. Why does the main body of the Brief not state that the Council would require 40% of the flats to be "affordable" housing ?
9. Why in the main body of the Brief is there no requirement on the developer to enter into a S. 106 Agreement to provide an education contribution and an "affordable" housing contribution if less than 40% of the flats are reserved for social housing ?
10. Why is there no specific reference to the payment of the Mayor's CIL charge?
11. In Table 1 of the Assessment of Uses the "Do Nothing" option is fully compliant with both Core Strategy Policy CS12 and Merton's Economic Dev. Strategy and yet it is described as "Not deliverable". Why ? It is currently being delivered ! The same could be said for the Option "All new business uses".
12. Why does the Brief not provide an estimate of the number of parking spaces needed to support
1) the residential development and 2) the business development ?

David Freeman on behalf of the Committee

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