APPENDIX C – BOROUGH PLAN ADVISORY COMMITTEE (01 August 2013)

Rainbow Industrial Estate – summary of consultation responses on the draft planning brief (June-July 2013)

1. Overview

Between 13 June and 25 July 2012, Merton Council undertook public consultation on a draft planning brief for Rainbow Industrial Estate. The consultation methodology included:

- Direct mailing to every postal address (residential and business) within 800m of the site in advance of 13 June 2012.
- Press notice in the local papers
- Attendance at the Raynes Park Community Forum on 20 June 2012 and at a separate meeting in Raynes Park library organised by local councillors on 10 July.
- A public exhibition on Friday 29 June 12.00pm to 5.00pm and on Saturday 30 June 12.30pm-4.00pm at Raynes Park Methodist Church Hall.
- Mailouts and publicity from local community groups and councillors helped to inform people about the consultation and encourage responses.

51 responses were received throughout the consultation process, including a petition opposed to development which contains 277 signatures.

25 people completed the comments forms which were available as part of the public consultation process. A further 21 separate representations were received from individuals and organisations, including residents associations who represent a large number of households.

Responses were accepted after the deadline date.

A review of the comments forms and the key themes emerging is set out below.

2. Key Issues

- Relationship between Workspace and Merton Council
- Introduction of housing to the site – and any further housing in the local area as a whole
- Traffic impacts
- Parking
- Density of housing
- Impact on local schools and associated infrastructure

3. Comments forms analysis

(25 comments forms received. However not all those who completed the forms responded to every questions, other questions allowed more than one response, therefore totals may not add up to 25)

1. *What should be the most important objective from any new development on the Rainbow Estate?*
    a. *Better employment space - 10*
    b. *Better environment of the site - 11*
    c. *Provision of housing (including affordable housing) - 3*
    d. *Improvements to the site access and provision of kiss n ride- 11*
    e. *Reducing the numbers of HGV vehicles visiting the site - 10*
    f. *Other (please specify) '- 5*

Comments in response to question 'f' focused on:

- Retention of low cost industrial and small units
- Local residents will also need parking on site
- The local area needs schools
- Better connectivity to the surrounding area

2. *How do you view proposals to create an employment zone providing light industrial workshops and offices in new buildings?*
    a. *Positive - 18*
    b. *Negative - 4*
    c. *Don't Know - 2*

    75% of respondents supported the proposals for an employment zone in the local area.

3. *Is it important to you that employment numbers increase in a regenerated Rainbow Estate?*
    a. *Yes - 16*
    b. *No - 4*
    c. *Don't Know - 4*

    67% of respondents view an increase in employment numbers in the local area as important.

4. *There have been discussions about whether the business space should be based around a single block to be enclosed and contained (Option A) or in two blocks to make it more permeable (Option B). Do you have a preference?*
    a. *Option A - 0*
    b. *Option B - 11*
    c. *No preference - 11*

    50% of respondents preferred Option B with a further 50% having no preference.

5. *Do you support proposals for mixed-use on the Rainbow Estate – i.e. homes alongside employment?*
    a. *Yes* - *13*
    b. *No* - *9*
    c. *Don't Know* - *2*

    54% of respondents support the principle of proposals for a mixed-use development on the site.

6. *The proposals are for 200-250 homes on the site situated around courtyards and gardens including affordable homes and a mix of one, two and three bedroom homes. What is your view on this?*
    a. *Positive* - *7*
    b. *Negative* - *13*
    c. *Don't Know* - *1*

    33% of respondents support the proposals for homes on the site. Many of those who opposed the plans stated concerns

    Much of the concern around the provision of housing centred around the density of housing and the perceived lack of facilities, including car parking, schools and transport connections.

    Several respondents commented that there should not be any more houses in the local area at all.

7. *The proposals show two options, and has a maximum height of 6 storeys (Option A) and the other allow for a maximum height of 7 storeys (Option B). Do you have a preference?*
    a. *Option A* - *10*
    b. *Option B* - *1*
    c. *No preference* - *9*

    50% of respondents preferred the lower option of housing. Several respondents stated 'neither', setting out their opposition to the development as a whole.

8. *What is your view of the proposals to reconfigure the entrance to the site and Station Approach?*
    a. *Positive* - *20*
    b. *Negative* - *3*
    c. *Don't Know* - *2*

    80% of respondents supported the plans to improve the entrance to the site and Station Approach, recognising the contribution this could make to the local area and the problems which currently exist.

9. *What sustainability measures would you like to see incorporated into any development on the Rainbow Estate?*

a.	*Renewable energy to supply buildings on site*	*-*	*17*
b.	*Combined heat and power plant*	*-*	*6*
c.	*Energy efficient building materials*	*-*	*18*
d.	*Sustainable urban drainage systems*	*-*	*18*
e.	*A car club*	*-*	*9*
f.	*Rainwater harvesting*	*-*	*17*
g.	*Any other suggestions (please let us know below)*	*-*	*4*

Sustainability measures generally received wide support from respondents. Those who opposed the plans in general highlighted areas which were viewed as important should the proposals go ahead.

10. *Do you have any other comments about the outline proposals for the Rainbow Industrial Estate?*

The main comments received in response to this question were:

- Concerns over the volume of traffic and impact on existing problems.
- Heights of building.
- Need for schools in the local area
- Access to and from the site
- Concerns over the consultation and SPD development process
- The need for high quality design
- Need for parking
- The numbers of people in the local area and questions over the 'need' for any additional housing here or elsewhere in Raynes Park
- The existing house by the entrance to the site (requests for it to be demolished and other requests for it to stay)
- The needs of existing residents
- Types of housing – flats/apartments etc
- Great improvement on the existing site
- The need for employment and industrial to remain on site

4. Additional representations analysis

Public meeting at Raynes Park library, Tuesday 10 July 2012, attended by approx 35 people (count carried out for the motion at the end of the meeting.)
Two motions:

- "This meeting rejects the draft supplementary planning brief and urges Merton Council to produce its own planning brief in accordance with planning rules" – passed unanimously.
- "This meeting rejects residential / housing on the Rainbow site" – passed by approximately two thirds majority.

Wimbledon Society Planning Committee:

- The proposal needs to be rethought;

- Concerns over loss of existing businesses;
- Concerns over height of the buildings
- View that no further housing is needed

Raynes Park and West Barnes Residents Association:

- The Council should not be representing the views of the developer as their own;
- The industrial estate has entered a period of wilful neglect;
- The jobs figures are unreliable;
- There should be references to alternatives to the site;
- There would be no opportunity to change the impact on local roads due to parking needs;
- The documentation is misleading in terms of promoting S106 as a means to relieve pressure on infrastructure;
- The document does not demonstrate the need for residential to improve the industrial, Workspace should use capital or debt to do so and not the planning process;
- The Planning Brief is heavily skewed to allow residential;
- The site is wholly inappropriate for residential development due to lack of access, proximity to the railway lines, strain on infrastructure etc.
- Car parking is grossly inadequate

The Residents Association of West Wimbledon:

- Current designation of the site should be retained and no change of use permitted;
- The plans should contain adequate investment to upgrade it for modern mixed commercial use.

Sutton and Merton Primary Care Trust

- This development could justify investment in 0.5 a GP, with a potential premises requirement of 120sqm gross internal area.

- The Primary Care Trust may require the redevelopment to fund this additional capacity.

Raynes Park ward councillors

- More employment could be created from reviving the site solely for employment use (SMEs). Potentially more people are employed off-site that have not been recognised.
- Feasibility of second bridge or tunnel entrance to the site has not been properly explored.
- Need for family homes with gardens for children, limited need for apartments
- Site should be considered for a new school.

Dundonald Liberal Democrats:

- Merton needs to maintain and improve employment land;

- Concern over the relationship between Workspace and the Council;
- Impact and response to local amenities;
- Employment numbers should be increased;
- How will housing be managed?
- Concerned over impact on traffic and parking.

Network Rail (received over a six month period)

- Network Rail could only support the planning brief when details between Network Rail, Workspace and Cunane (*planning applicant for former station house conversion to six 1-bed flats)* have been resolved.

- Network Rail would also insist that any proposed Kiss and Ride at Raynes Park must be able to incorporate Network Rail's proposals for the refurbishment of Station House and associated car parking.

- Network Rail want to ensure no vehicular conflict around the entrance to the site (outside the former station house, proposed Kiss and Ride area)

- Network Rail may seek best value for their road at the site's entrance if public access is to be formalised and they want to know what legal mechanism will be used to formalise this.

- Network Rail would like the council to investigate trucks using its (Network Rail's) land

- Questions about the process.

Residents/Other Respondents (19 representations)

- Would strongly oppose any waste treatment facility;
- Welcome redevelopment to improve the site and landscaping proposals but concerns over number of homes and density;
- Opposed due to unsuitable access, inadequate parking, pressure on local amenities, increased traffic, lack of employment, empty work units.
- Proposals for mixed-use would be ideal but 200 homes should be the maximum with 4-storeys as the maximum height;
- The site could be used as a car-park;
- Concerned that Workspace are telling the Council what to do, concerned about schooling and access to the site, concerned about industrial development alongside residential;
- The plans are well-considered but concerns over the height, green spaces could also be reconfigured to include a children's play area;
- Overall in favour of the plans as the site is run-down, entrance must be widened, concerned about contribution to schools;
- Too much housing already on and around Grand Drive and associated issues;
- The site should not be used as a school as it only has one entrance
- The site should not be used for offices, industrial or housing

- Concerns over the impact of housing on local schools;
- Concern over relationship between Workspace and the Council, conflicts of interest and due diligence;

Actions taken as a result of recommendations received at the July 2012 consultation

Issue raised	Action taken
Relationship between the landowner (Workspace) and the council; the council should produce the planning brief	The council has fully funded and produced all aspects of the final planning brief, including research to inform the final brief. Where appropriate, the council has commissioned external advice.
Introduction of housing to the site; concerns over any further housing in the local area	At Merton's Core Planning Strategy examination in 2011, the planning inspector determined that the site could be redeveloped for a wider range of uses other than industrial-type employment where this led to employment-led regeneration of the site. The inspector noted the need for higher value uses cross-subsidise delivery. Appendix A sets out the land uses considered. National planning policy Framework sets out that all councils must meet their objectively assessed housing needs for the borough.
Housing density	Following the 2012 consultation the council re-examined development densities and unit sizes in conjunction with planning policies and viability.
Concern over traffic impacts	Following the 2012 consultation, the council commissioned further transport (pedestrian and vehicle) movements to and from the site, around the site entrance and along Grand Drive. The results are set out in the transport report accompanying the brief, and demonstrate that the volume and type of traffic would be reduced by the redevelopment compared to current vehicle movements. The research also demonstrates that the number of large vehicles would be reduced from the redevelopment.
Parking – concerns over parking impact	All parking will be on-site and will be in accordance with the London Plan parking standards for businesses and homes. Following the 2012 consultation, the council commissioned further parking observations and vehicle turning at the site's entrance over several days and examined results from sources including Census 2011, Transport for London London-wide monitoring and . The results are set out in the transport report accompanying the brief.
Impact on / contributions to local schools	The council has assessed the number of children that may live in the proposed development (based on the formula The calculations are based on the maximum number of units (250 homes: 40%1 beds, 40% 2 beds; 15% 3 beds; 5% 4-beds). Primary school places - This assessment illustrates that an development of the number and size of homes as described in the planning brief may give rise to 39 primary school children (aged between 4-11). Currently there are four community primary schools within 1.5 miles of the site, which can accommodate 1,900 primary school children. In addition, there are two voluntary aided (faith) primary schools within 1.5 miles of the site which can accommodate an additional 630 primary

	school places. Secondary school places – the assessment illustrates that a development of the number and size of homes as described in the planning brief may give rise to 12 secondary school children. The nearest co-educational comprehensive secondary school to the site is Raynes Park High School (accommodating 1,200 co-educational school places for 11-19 year olds). and the Ursuline High School (accommodating 1,360 Roman Catholic girls) Planning obligations will be used to ensure that the development can mitigate any impact on school places with a further assessment of supply and demand to be conducted for the time residential development has finished construction. Appendix 1 to the planning brief sets out the alternative uses (including a school) that were assessed for the site.
Access to and from the site	Following the 2012 consultation the council conducted further research into alternative site access: to West Barnes Lane and to Bushey Road (pedestrian and vehicle). The findings are contained in the Access Assessment accompanying the brief, and demonstrate that alternative access isn't deliverable
Concerns over employment numbers (existing and new), loss of existing businesses, demand for new employment floorspace	Assessment of similar sites illustrates that on average 3 people are employed similar new business units, leading to an estimate of 100 jobs. The proposals were presented to the Raynes Park business forum in 2012.
Other sources of finance should be used to fund site redevelopment	National planning policy and associated government guidance requires plans to be deliverable and viable and cross subsidy is now a recognised consideration in the planning system
The site should be used for alternative uses: car park, open space, school, whole site employment	The report "Background to the site including assessment of alternative uses" sets out the uses considered by the council
Concerns over building height and density	The urban design and public realm report illustrates the comprehensive review of design, scale, massing and layout issues relating to the site to ensure that the most appropriate built form is being recommended. Development density is appropriate for the accessible location near the town centre and transport hub and is similar to other recent developments in the area

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Actions taken as a result of recommendations received at the July 2012 consultation

Issue raised	Action taken
English Heritage is satisfied that Lambton Road conservation area is sufficiently screened from the site. Have the council considered and discounted the impact on nearby conservation areas, including Lambton Road?	The council has assessed the planning brief for the site in the context of the wider area. It is informed by the drafting of a character study for the wider Raynes Park and West Barnes areas (Borough Character Study) which analyses local character street-by-street. This is not limited to conservation areas and includes other areas of valued local character such as the "Apostles". The emerging Borough Character Study will recommend measures to improve local character in each area. It will be published for consultation in early 2014. Merton Council's Lambton Road conservation area character appraisal and design guide (2005) sets out how the conservation area's character should be maintained and enhanced. There are no other conservation areas nearby.
The Greater London Archaeological Advice Service recommends that the SPD indicates that a desktop archaeological assessment is conducted in the development of the site: nearby archaeology includes Bronze Age finds and potentially a Medieval moated manor site at West Barnes farm	This requirement is recommended to be added to the SPD. As the site is not currently designated within an Archaeological Priority Zone (the nearest one being to the south of Bushey Road) the council will also ask English Heritage to reconsider the boundaries of the West Barnes Archaeological Priority Zone when English Heritage are next reviewing these designations, to ensure that any other sites nearby are adequately considered for archaeological issues at
The council's conservation and design staff should be involved in the preparation and implementation of this type of planning document to best advise on historic environment issues	The planning brief is informed by the work of the council's conservation and design staff who conducted the character assessment of this site and the wider area, including the emerging character assessments for Raynes Park and West Barnes.
Development close to existing transport links needs to be higher density to address	The planning brief provides for this.

housing shortage	
Site should not be redeveloped without a second access point (pedestrian) across the tracks to West Barnes Lane	The council has investigated the possibility of alternative access to and from the site. This is set out in the Access report. It demonstrates that alternative access is not deliverable
Kiss and Ride is welcome; concerned that design proposed will increase traffic speeds and volume on section immediately south of the station entrance	The Raynes Park Enhancement Plan and the planning brief provide for this.
PTAL should be based on southern part of the site where the housing is proposed (PTAL 4,	PTAL is a mixture of 4 and 5 and this is indicated in the planning brief
Kingston / Bushey Roads are very busy and the proposal would have unacceptable impact on traffic and parking	The council has investigated vehicle and pedestrian movements relating to the site and its surrounds. The results of this investigation are contained within the Transport Report.
Significant impact on South West Trains	The scale of this proposal on its own will not have a significant impact on south west trains. There are proposals to increase capacity at Raynes Park station by extending the platforms to allow for 10-car trains; Network Rail have stated that this will be completed in 2013.
An industrial estate would damage neighbourhoods. Large trucks and delivery vehicles will have huge impact on air, roads and traffic in the area.	The proposed light industrial and workshop employment on the site will result in a reduced number of vehicles, especially HGVs, using the site compared to the current situation
Concern over inclusion of council housing in area.	National policy, the London Mayor's policy and local planning policy seeks to meet the housing needs of all sections of the community
Site only suitable for light industrial and storage and unsuitable for residential	Merton's Core Planning Strategy Inspector's report opened site to a wider range of uses than light industrial and storage. Site has been fully assessed and redevelopment can accommodate residential and employment
Brief should be	

structured in separate sections: Council aspirations; council requirements; constraints on development; alternative options for the site; planning obligations and consequential infrastructure requirements	The brief is structured according to the requirements of this site and in the format
Brief should address constraints including single access point; noise and overlooking from station and rail tracks; entrance road width restriction; contamination; potential vehicle congestion at entrance; potential limited access for emergency services; access owned by Net Rail.	Section 3 sets out the site's issues, opportunities and constraints and solutions
Mayor's CIL has been overstated as existing floorspace has not been deducted Brief should contain specific reference to the Mayor's CIL charge	The Mayor's CIL is £35 per square metre for most additional floorspace in Merton. The floorspace from the buildings on site will be replaced by the same quantum of new employment floorspace, and so would not be expected to be deducted from the Mayoral CIL calculations. The Mayor's CIL would be accurately calculated for planning applications (e.g calculations of communal floorspace within buildings, plant rooms etc.) and a full up-to-date viability study would be expected to accompany any planning application. Section 4 of the brief contains reference to the Mayor's CIL charge
The viability report second opinion states that a case could be made for reducing the developers profit	The 2nd opinion viability report concludes that the developers profit allowance is a reasonable reflection of risk for this project.
Kiss and Ride not safe or viable anywhere within Rainbow entrance, including its proposed location due to safety, road width, potential pedestrian /	The council's assessment demonstrates that the Kiss and Ride can be designed to be safe within the location prescribed in the planning brief. The Kiss and Ride project is part of the Raynes Park Enhancement Plan 2008-2011. Since the Enhancement Plan was created, the

dropoff vehicle conflicts	
Concern over massing: proposed southerly building at 6 storeys is larger than Bushey Court (4 storeys plus pitch); Waitrose (5 storeys); Carters Estate (2 storeys), offices in West Barnes Lane (3 storeys	The massing of the southerly buildings of up to 6 storeys is considered appropriate for this location. A planning application would be expected to
Why conduct a viability study to justify the quantum of residential if there is no increase in employment floorspace?	The 2012 consultation results stated concern about the numbers of residential units and whether these were needed to cross-subsidise the site's regeneration. Redevelopment, including decontamination, cost of materials and labour, CIL / S106, Kiss and Ride etc has a cost. The National Planning Policy Framework (paragraph 173)states that plans must be deliverable and that councils should assess the cumulative impact of all policies and standards in plans to ensure this. The 2nd opinion was sought to double check the existing assessment independently.
Brief should state the number of people employed by the site and the number of potential new jobs redevelopment could create	Based on other similar developments, the number of people directly employed in the new floorspace is likely to average 3 people per business unit, totalling around 100 people
Brief should set out the investigations into the additional vehicular access to the site	This has been included separately in the "access assessment" informing the planning brief.
Brief should set out consequential infrastructure requirements under one heading, especially children (estimated 200)	Brief can include this. Using the council's calculations of the likely number of children (based on the maximum number of units and bedrooms: 40% 1-bed; 40% 2-bed; 15% 3-bed and 5% 4-bed) may generate 39 primary school children (aged 4-11) and 12 secondary school children (aged 11-18)
Brief (section 4) should state that 40% of units should be affordable housing	Section 4 (page 35) states that council requires 40% affordable homes, and includes the tenure mix (affordable rent and intermediate
Brief (section 4, community facilities) should include Education Assessment and necessity of providing developer's	This can be included. If any development proposals are granted planning permission after 01 April 2014) education assessment impacts will be collected through Merton's Community Infrastructure Levy.

contribution towards education	
Options table: why is “do nothing” option not deliverable?	The council is not in a position to prevent landowners pursuing redevelopment and regeneration of their sites. The landowner first pursued wholescale redevelopment of the site in 2007/2008 for a waste management facility on the industrial site. The council resolution objected to this proposal. The landowner then proposed employment led redevelopment cross-subsidised by higher value uses. The council objected to this proposal. The council and the landowner presented their cases to the independent planning inspector who determined that employment led whole site regeneration cross subsidised by higher value uses was appropriate for this site, subject to the production of a SPD. The council could chose not to adopt a SPD for the site but it would be unlikely that the landowner would not continue to pursue the site’s redevelopment ,and it would mean that the guidance on design, scale, movement etc contained in the SPD would have no bearing on the planning application.
The brief should estimate the number of parking spaces for the residential and commercial	London Plan maximum parking standards require less than 1 space per 1-2bed home; 1-1.5 spaces per 3 bed and 1.5 to 2 spaces per 4 bed . Using local development scenarios to inform the brief (and based on the maximum 250 units: 40%1 bed; 40% 2 bed; 15% 3 bed; 5 % 4-bed) parking standards could range from a total 89 residential parking spaces to 261 residential parking spaces. It is considered that the exact number of parking spaces (within London Plan standards) should relate to the design and layout of the development. Paragraph 6.10 of the brief sets out how parking standards should be applied to ensure that the site operates effectively. The London Plan maximum parking standards for employment floorspace for this proposal range from a maximum of 365 to a minimum of 61 parking spaces for employment.