

From: THE APOSTLES RESIDENTS ASSOCIATION (ARA)

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

Representation regarding 'Site Proposal 41: Kingston Road Opposite Lower Downs'

We 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. It is 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. That continues to be the view of the ARA.

To propose more housing on a site and make a public open space deficiency even worse when it could be alleviated is illogical.

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, we are surprised to hear that J C Decaux own of the site. Advertisers do not normally own sites; they merely pay the land/property owner rent for the right to place their adverts. We trust the Council will ask for sight of the legal documentation that shows them to be the owners. Local knowledge of the history of the site indicates that the site was originally owned by London Transport (or now presumably its successor, Transport for London), and 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.

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I write in response to the consultation on 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 needs to be a coherent policy for assessing the impacts of relocating existing tenants if a change of use is to be considered. 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.
5. Whilst we don't agree with a change to residential, if that is the final decision then
 - a) housing on the site should have heights to eaves or ridgeline no greater than existing adjacent housing in Bronson Road and Kingston Road,
 - b) no flat roof development should be allowed and
 - c) all units should be family homes with gardens similar to in the Apostles streets.Should this be considered financially unviable for any reason then housing should not be allowed on the site. Higher density housing is unacceptable on this site.

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I write in response to the consultation on 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 totally 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.