E. Raynes Park
Potential sites and draft policies maps
January 2013
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Introduction – Merton’s potential development sites and policies maps (stage 3 of Merton’s Sites and Policies Plan)

This is the final consultation stage of Merton’s Sites and Policies Development Plan, (known as stage 3). The plan contains draft detailed planning policies, potential sites for development and proposed land use designations. Once adopted, it will guide decisions on planning applications in Merton, replacing Merton’s Unitary Development Plan 2003.

This is Part 2 of Merton’s Sites and Policies Development Plan. It contains potential development sites and draft land designations in the Policies Map (formerly known as the Proposals Map).

- The potential sites for development
- The draft policies map of the borough shows where specific policies or sites are represented on a map such as the town centre boundaries, protected neighbourhood shopping parades, open spaces or proposals for a new tram route.

All of these potential sites and draft policies maps have been published for consultation previously, between January and July 2012. Since August 2012 these maps have been amended as a result of the comments received, additional research and changes to national policy.

This is the opportunity to have your say on the final plan. Please tell us what you think by Wednesday 27 February 2013.

Have your say – your feedback is important to us

Please tell us what you think about the draft plans by Wednesday 27 February 2013 by responding in writing by post or e-mail to:

Strategic Policy and Research  
Future Merton  
London Borough of Merton  
12th Floor Civic Centre  
London Road,  
Morden. SM4 5DX.

Email: ldf@merton.gov.uk  
Telephone: 020 8545 4141/020 8545 3837

If you are part of a community group, business forum or other organisation and would like someone to attend to explain the site assessments, please contact us by telephone at: 020 8545 4141/020 8545 3837, by e-mail at ldf@merton.gov.uk or by post at: Strategic Policy and Research, Future Merton, London Borough of Merton, 12th Floor Civic Centre, London Road, Morden, SM4 5DX and we will do our best to meet your request.
What has guided the potential sites for redevelopment?

Between July and September 2011 (Stage 1 of the plan process) we invited individuals and organisations to let us know about potential sites for redevelopment. This consultation was known as the “call for sites”. The potential sites were suggested by public and private sector landowners, community groups, residents and businesses to provide new uses.

From September-December 2011, each of the sites was assessed for a range of planning issues including:

- The current use and potential new uses for the site, including the use suggested by the person / organisation at public consultation.
- Geographic effects in relation to the site: likely risk of surface water or fluvial flooding, any potential known drainage issues, access from the site to a range of transport choices, where the site is located in the borough and the land use of sites adjacent to it.

Between January and May 2012 the potential sites were published for consultation, known as Stage 2; People and organisations commented on the sites. During this time, landowners, local residents, developers and others suggested an additional 15 potential sites. Between June and July 2012, people and organisations had their say on the council’s assessment of the additional 15 sites, known as Stage 2a.

Following consultation feedback, local research and national changes, we have amended the potential sites and are publishing these changes, known as Stage 3. Some of the sites that were initially suggested for redevelopment to provide new uses have not progressed to this round of public consultation at this time, for the following reasons:

- the site has been withdrawn by the person or organisation that originally suggested the site;
- the potential uses for the site are set out in other documents (e.g. Merton’s Core Planning Strategy 2011) and redevelopment of the site is already in progress in conjunction with the local community through a planning brief;
- the site is already the subject of a live planning application;
- the site already has permission for its potential use so to allocate it for the same use would not provide any greater certainty or benefit than currently exists.

All of the potential sites have been published for consultation during 2012; this current consultation stage does not contain any new sites. Additional sites cannot be considered at this stage of consultation but we welcome your feedback on the potential sites for new uses included in this current consultation document.
Ensuring quality in Merton – delivering new development

Future development proposals for all of the sites will be expected to be of a **high quality design** that is appropriate to the scale and setting of its neighbourhood. Only where a design issue is unique – for example where the site is particularly narrow - has it been mentioned in the summarised assessments.

All sites will have to meet the local and national standards for reducing energy consumption and **combating climate change** that is expected at the time of its development.

All sites will have to be the subject of **planning applications**, involving further community engagement to determine the details of each development, for example the number of parking spaces, the number, size and tenure of any new homes, the delivery space for commercial developments and the like.

In planning terms, the Use Class D1 or the phrase “**community uses**” generally refers to a wide range of potential use including healthcare, schools, colleges and adult education, youth centres, day care (children or adults), crèches and places of worship. Unless it is explicitly stated otherwise, when the term “Community use” is used in these site assessments, it refers to the full range of uses found in Use Class D1.

Some of the sites may have **restrictions** on their potential for redevelopment that are outside the planning system, such as legal covenants, hidden utilities infrastructure or land ownership issues. Where we are aware of such restrictions these are mentioned in the site assessments and we welcome more information. However, as these are not matters that the planning system can manage, we will not assess the financial or legal impacts of these restrictions on the site’s potential for redevelopment.

To be included in the final plan, **each site must be deliverable for its proposed uses within the next 11 years** (by 2023). In other words there must be a person or organisation that is willing to fund and build the site for its potential use, either the landowner themselves or in conjunction with the landowner. If there is no evidence that the proposed use will realistically be funded and constructed during this time, the site will not be allocated in the final plan.

Notes on site assessments

Starting on the next page, the site assessments summarise the issues raised from initial research carried out on each site.

Each assessment addresses all the points in the table below and includes a map of the site suggested by the respondent at consultation, as well as a smaller map showing its setting in the borough.

<table>
<thead>
<tr>
<th>Site description</th>
<th>Summarises the existing use of the site, the neighbouring uses and building heights in its immediate setting and its wider setting.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategic Planning Factors</td>
<td>Summarises the planning factors on-site, then a summary of any relevant factors in the wider area. The site’s planning history is only included where it is very pertinent to the allocation.</td>
</tr>
<tr>
<td>Current use</td>
<td>Current use of the site, sometimes accompanied by the relevant Use Class in planning terms.</td>
</tr>
<tr>
<td><strong>Use suggested / organisation</strong></td>
<td>The suggested use for this site at the “call for sites” public consultation between July-September 2011, and the organisation / individual that proposed the site.</td>
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<tr>
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</tr>
<tr>
<td><strong>Council’s preferred use</strong></td>
<td>Following initial site assessment, the council’s preferred option for the use of this site</td>
</tr>
<tr>
<td><strong>Delivery</strong></td>
<td>The years when a planning application is expected for the site, which would lead to construction starting.</td>
</tr>
<tr>
<td><strong>Issues</strong></td>
<td>A concise briefing of issues during the course of the council’s assessment of the site.</td>
</tr>
</tbody>
</table>
What has guided the draft policies map so far?

The draft policies maps show where specific policies or sites are represented on a map such as the town centre boundaries, protected neighbourhood shopping parades, open spaces or proposals for a new tram route.

The draft policies maps have been informed by feedback to the previous two consultations between January and July 2012 from residents, businesses and other organisations, local research, national changes and input from the Mayor of London.

In 2011, the research that supported Merton’s Core Planning Strategy and South London Waste Plan passed examination by independent inspectors. We are making effective use of resources by using this research again to help guide the draft policies map, as well as the draft detailed planning policies and potential development sites. Once adopted in 2014, the final policies map will replace the proposals map of Merton’s Unitary Development Plan (UDP) 2003.

Government has changed the national planning system and this is set out in the National Planning Policy Framework 2012 and the Mayor’s new London Plan 2011 which affects development in London. It is a good time for Merton to show how national and regional issues might be interpreted locally.

In April 2012 new government regulations came into force called the Town and Country (Local Planning) (England) Local Regulations 2012. These regulations refer to “the policies map” which effectively replaces the name “proposals map”. In accordance with the regulations, the policies map must be compromised of, or contain a map of the local planning authority area which must illustrate geographically the application of policies in the development plan.

To make it easier to see all the details, the maps are organised by the whole borough and then, where relevant, local area – Colliers Wood, Mitcham, Morden, Raynes Park and Wimbledon.

What will happen next?

Your feedback from all the previous consultation stages combined with local research, national policy changes and any other relevant information will be used to create the final Sites and Policies DPD plus Proposals Map.

This will be submitted to Councillors in spring 2013. If they approve the plan, there will then be a final opportunity for six weeks around March 2013 for people or organisations to say how they want the plan to be improved.

The final plan – and all the comments received – will then be sent to the Secretary of State in summer 2013 who will appoint an independent planning inspector to examine whether the plan is “sound”. If the plan passes the examination, it can then be adopted as part of the council’s development plan to help decide planning applications for new buildings. The plan adoption is scheduled for February 2014.
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Introduction

The main changes in Raynes Park between January 2012 (stage 2 consultation) and January 2013 (stage 3 consultation)

- Potential sites: the two landowners of Site 48 “Land at Bushey Road” have provided greater clarity on their proposals since January 2012 (stage 2)
- Amendments to Raynes Park town centre boundary to reflect consultation responses in June-July 2012 ((stage 2a)
- Amendments to Metropolitan Open Land boundaries to reflect recent planning decisions
- One site in the area has been withdrawn from the Sites and Policies Plan.

<table>
<thead>
<tr>
<th>Site number, name, ward</th>
<th>Reason for recommending not to allocate the site in the DPD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site 55 Field B, St Catherine’s Square, West Barnes</td>
<td>The site was assessed by independent ecologists and it does not meet the criteria to be designated as a Site of Importance for Nature Conservation at this point in time. Accordingly, the site will retain its existing Metropolitan Open Land, Green Corridor and Green Chain designations.</td>
</tr>
</tbody>
</table>

- Wandle Valley Regional Park boundary: consultation on a number of detailed boundary changes.
- Designated open spaces: criteria to guide the determination of whether or not land should be designated as open space are presented here Consequently there are changes to the designated open space boundaries across the borough.
- Transport proposals: a comprehensive approach regarding the cycling network is presented at this stage. There are proposed links between the existing routes in order to enhance the connectivity across the whole network.

Detailed maps which illustrate all the above changes are presented on the following pages.
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Site Proposal 15

Site area 0.1 ha

Site description Single storey building tucked away behind Motspur Park station. To the west the site is limited by the railway lines. To the east there is a 2-3 storey business block which sits partially overhanging the library site.

The site has no active frontage along the street except for the library itself.

Strategic Planning Factors The site is within an area with low access to public transport (PTAL 2) despite the proximity to Motspur Park station. The site is also within a flood zone (3a) and critical drainage area.

Current use Library (D1 Use Class)

Use suggested / organisation Library to be maintained and improved. Residential on part of site to support library function – London Borough of Merton

Council’s preferred use Library (D1 Use Class) with residential (C3 Use Class) on upper floors.

Delivery timetable 2013 – 2018
### Issues

Library to be retained and improved to service specifications including space for a new community hall. Service specifications increase customer floor area, provide more adaptable and suitable modern space.

The design of any proposals will need to be sensitive to the railway line.

In a mixed use development, residential uses should be on upper floors.

A mix of uses will facilitate the provision of upgraded community uses on lower floors and create a more secure environment.

Manage parking, traffic and road safety impacts on neighbouring residents.

The critical drainage area is known to flood during very heavy rainfall events. The pluvial flooding does not show deep ponding flooding however, blocked drains and gullies are known to contribute to flooding in this area.

The railway embankment acts as a barrier to surface water flow through centre of the critical drainage area.

Historic surface water flooding records identify drainage network capacity issues which cause water flooding in this area during heavy rainfall.

### Summary of consultation responses

Issues were raised from various parties during the consultation stage and are summarised generally as follows (abridged):

- Retention and enhancement of a library on the site
- The provision of parking for future development and increased traffic
- Potential future use could include a GP surgery/health centre

### Further research

Initial space requirements for a new library have been drawn up and will be assessed for deliverability and viability during 2013 and 2014.

### Schedule of changes from the Stage 2 consultation document

- The site is identified in flood zone 3a
- Addition of a ‘summary of consultation responses’ section
- Addition of a ‘further research section’
**Site Proposal 23**

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**Site area**  
0.09 ha

**Site description**  
The site consists of a part-single and part-two storey building that is surrounded by two and three storey houses. Along the northern boundary is a narrow public access footpath.

**Strategic Planning Factors**  
The site is located within the Raynes Park town centre boundary and has good accessibility to public transport services (PTAL 5).

**Current use**  
Medical clinic (D1 Use Class)

**Use suggested / organisation**  
Residential (C3 Use Class) – Sutton and Merton PCT

**Council’s preferred use**  
Mixed use community (D1 Use Class) and residential (C3 Use Class) or solely residential (C3 Use Class), if the community service is provided elsewhere locally.

**Delivery timetable**  
2018 – 2023

**Issues**  
Planning permission has been granted for a new health centre in Lambton Road, Raynes Park, which is due to open in 2013.

In a mixed use development, residential uses should be on upper floors.
A mix of uses including residential would facilitate the provision of modern community facilities on lower floors and create a more secure environment, helping to minimise vandalism and crime.

Any development proposals should recognise and improve the public footpath adjacent to the site.

Mitigating potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site.

**Summary of consultation responses**

Issues were raised from various parties during the consultation stage and are summarised generally as follows (abridged):

- Recognition of the residential nature of the surrounding area
- The site should be for a limited amount of residential use only
- Objection to any social housing on the site
- The site should be used for community/healthcare purposes
- New development to be of a similar scale and form to the existing residential properties in the street
- Potential impacts on parking in the vicinity of the site
- Potential noise impacts generated during construction and operation resulting from redevelopment.
- Any development proposals

**Further research**

November 2012: The site was assessed in an external report commissioned by the London Borough of Merton for its suitability as a school but was rejected on grounds of access and size.

Sutton and Merton Primary Care Trust (PCT) will cease to exist from 01 April 2013 and will be superseded by the Merton Clinical Commissioning Group for strategic health matters.

**Schedule of changes from the Stage 2 consultation document**

- Addition of a ‘summary of consultation responses’ section
- Addition of a ‘further research’ section
- Consequential improvements throughout the document
Site area 0.11 ha

Site description The site is a grassed area with advertisement hoardings located on Kingston Road, opposite the junction with Lower Downs Road and Burstow Road, Wimbledon, SW20.

The site is located in a predominately residential area. Adjacent to the west of the site are two and three storey terraced houses. Adjacent to the north of the site are two storey terraced houses and commercial units. Two storey terraced houses are also located adjacent to the east of the site. Adjacent to the south of the site is a large industrial premises and also two storey terraced housing.

Strategic Planning Factors The site fronts onto Kingston Road which is an existing Cycle Route and Strategic Route.

This site is in an area with moderate access to public transport services (PTAL 4).

The site is adjacent to a conservation area and also a nature conservation area.

Current use Vacant land will billboards
**Use suggested / organisation**  
Residential - The Wimbledon Society (local civic society) and JCDecaux Limited (owner)

**Council’s preferred use**  
Residential (C3 Use Class)

**Delivery timescale**  
2013 – 2018

**Issues**  
The site is situated on the inside of a tight bend with two side roads opposite. There is a busy through route from Kingston Road into Lower Downs Road using a restricted railway arch. Several schools are also situated to the north of the railway arch which contributes to local congestion at peak times. On the south side of the bend is a shared pedestrian/cycle crossing linking to a segregate cycle facility along The Chase.

To avoid any detrimental traffic impacts servicing would be most appropriately sited at the westernmost boundary of the site. Although potential to service/access the site via the private rear access to 448 – 458 Kingston Road may be possible subject to appropriate legal agreements being put in place with the relevant land owners.

The accessibility level of the site (PTAL 4) would support low levels of parking provision or permit free, subject to a controlled parking zone being in place on surrounding streets (not currently programmed).

The potential for vehicular access off Kingston Road is also limited due to potential safety impacts. Therefore any approval would be subject to a detailed transport assessment.

Respecting the character and the views into and from the neighbouring Conservation Area.

Respecting and enhancing the adjacent nature conservation Area.

Protecting the residential amenity of those properties adjacent to or in the vicinity of the site.

**Summary of consultation responses**  
Issues were raised from various parties during the consultation stage and are summarised generally as follows (abridged):

- The site should be used for a school (in conjunction with site 77 at 26 Bushey Road) or employment use
- The site could be designated as open space
- The area is at capacity for new homes
- Support for residential development of the site
- Potential traffic impacts resulting from development

**Further research**

Council has received representations from the landowner, JCDecaux Ltd which confirms the extent of their freehold ownership encompassing the area indicated by the red line boundary on the map above, and their interest in redeveloping the site for residential use.

**November 2012:** The council commissioned research to provide school places and this site was assessed for its suitability as a school in conjunction with the sites to the south. It was found to be unsuitable on grounds of size, external space, traffic and noise in an external report commissioned by the London Borough of Merton.

**Schedule of changes from the Stage 2 consultation document**

- Amend the reference to the owner of the site being unknown as it has been confirmed to be JCDecaux Limited
- Addition of a ‘summary of consultation responses’ section
- Addition of a ‘further research’ section
Site Proposal 48

Site area 2.67 ha

Site description
The site consists of large-scale industrial buildings ranging between two and five storey in height, and open parking areas. To the west is the A3 ‘Beverly Way’ dual carriageway and to the south is Bushey Road (A298). To the east of the site is a “Pets at Home” store and, beyond that, a primary school. To the north, on the opposite side of Bodnant Gardens, are two-storey houses.

Since January 2012 the site boundary has been amended to exclude the “Pets at Home” store and to clarify that the landowners are pursuing separate schemes. Sections 48a and 48b are under separate ownership.

Section 48a consists of a vacant office 5 storey office to the southern end (Apex House), and warehouses. Section 48b consists of the vacant Art Deco former Thales Avionics offices with a warehouse to the rear.

Strategic Planning Factors
This whole site is identified as a ‘Locally Significant Industrial Site’ in Merton’s Core Strategy 2011. The site is in close proximity to the Strategic Road Network (A3 and A298 and a number of flyovers. It is in an area with low to moderate accessibility to public transport services (PTAL 2 and 3). Parts of the site are within a Critical Drainage Area, with only the southwestern corner (section 48a, Apex House within Flood Zones 2 & 3).

The building at 84-86 Bushey Road (section 48b) with the clock tower is
locally listed. Adjacent to the northwestern boundary of the site is a Green Corridor.

Current use

Section 48a: Offices (B1[a] Use Class: Apex House, vacant since before 2006); Storage and Distribution (B8 Use Class: currently occupied by Safestore); Light Industry (B1[c] Use Class, currently occupied by Racetech).

Section 48b: Offices (B1[a] Use Class: former Thales Avionics, vacant since 2010 to centre).

Use suggested / organisation

Stage 2 (January 2012): Employment (B uses), Sui Generis e.g. vehicle sales, Retail (A1 Use Class), Hotel (C1 Use Class) and Community Use (D1 Use Class) – BNP Paribas (consultants) representing Ignis Real Estate and Axa Real Estate.

Stage 3 (January 2013):
- Section 48a: retail (A1 Use Class), to replace Apex House and Safestore (proposed by landowner Axa Real Estate)
- Section 48b: employment (B uses); bulky retail (A1 use class) sui generis e.g. vehicle sales; community use (which could include education - D1 Use Class) proposed by BNP Paribas on behalf of Ignis Real Estate, for the former Thales Avionics portion of the site and the industrial building to the rear.

Council’s preferred use (for both parts of the site)

An employment-led mixed use scheme research and development (B1[b] Use Class), light industrial appropriate in a residential area (B1[c] Use Class) and storage or distribution (B8 Use Classes) that may included an appropriate mix of any of the following: bulky goods retail (A1 Use Class), car show room (sui generis Use Class) and school (D1 Use Class).

Delivery timescale

2013 – 2023

Issues

Since January 2012, the two landowners have decided not to take forward comprehensive redevelopment across the two ownerships and are currently pursuing separate schemes (see “uses suggested / organisation” section).

As a ‘Locally Significant Industrial Site’ mixed-use proposals must be employment led.

Any retail development proposed on the site will be restricted to providing at least 70% of retail floorspace as ‘bulky goods’ for sale on the premises, in order to avoid undue harm to the viability of Wimbledon town centre and other surrounding centres.

Due to the site’s location relative to the A3 road, a high quality design is
necessary that will be responsive to the on-site and off-site uses and respect the locally listed building.

Proposals must protect the amenity of the adjacent houses and school.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the flood risk and the Critical Drainage Area.

Careful scrutiny of access and junction arrangements needed to minimise impacts on movement, congestion and road safety in particular wider impacts on strategic road network (TLRN). Transport assessments must consider the potential effects on the whole site. Poor permeability and accessibility by public transport. Infrastructure/service improvements expected to support comprehensive re-developments.

This section of the A3 is identified on the Department for Transport’s noise map. Both existing and generated noise impacts will be considered in any proposal.

**Summary of consultation responses**

Issues were raised from various parties during the consultation stage and are summarised generally as follows (abridged):

- That the site is not suitable for any element of residential use
- That the site is currently identified as Strategic Industrial Land although it is acknowledged the current use does not reflect this
- The site is a suitable size for a school
- The site is only suitable for employment use
- Potential impact on policing needs
- That Pets at Home is not likely to be available for redevelopment during the plan period (until 2023)
- That a Next Home store could be delivered on the western portion of the site (from landowner Axa Real Estate)
- That the central portion of the site could be suitable for a range of uses including education, vehicle showroom or bulky goods retail.

**Further research**

Since January 2012, the two landowners have decided not to take forward comprehensive redevelopment of the whole site and are currently pursuing separate schemes (see “uses suggested / organisation” section). The eastern portion of the site (Pets at Home) is not available for redevelopment before 2023. This area (80 and 82 Bushey Road) has been removed from the draft allocation.

BNP Paribas now solely represent Ignis Asset Management who owns Section 48b, the vacant office/warehouse buildings with the locally
listed building (formerly the central part of the site in the previous Stage 2 consultation document).

Research, including marketing evidence specific to the site, illustrates that office occupiers are not attracted to this location. The landowner is considering a range of uses which could include education, sui generis (vehicle sales), or retail use (bulky goods).

Axa Real Estate owns Section 48a, comprising Apex House (vacant office), Safestore and Racetech. Axa are proposing redevelopment for retail use (A1 Use Class) replacing Apex House and Safestore with a new Next Home store in this portion of the site.

Redevelopment of the site is anticipated to bring approximately 150 jobs to the site and local community.

Marketing of both parts of the site has shown little to no interest in retaining the current office/light industrial use for the vacant areas of the site.

Schedule of changes from the Stage 2 consultation document

- Reduction of the red line boundary for the site as the eastern portion is not available
- Amend the ‘site description’ section as a result of the reduced area
- Update to the ‘use suggested/organisation’ section following further research
- Amend the ‘issues’ section following further research
- Addition of a ‘summary of consultation responses’ section
- Addition of a ‘further research’ section
Site Proposal 74

Site area 0.54 ha

Site description The site, whilst irregular in shape, is well proportioned. It is currently occupied by a bowling green with associated single storey timber structures to the east of the site. The western part of the site is occupied by an open hardstanding carpark for approximately 20 cars. A single storey brick clubhouse lies in the westernmost corner of the site. Vehicular access to the site is via a long narrow driveway entry from Lower Downs Road.

The gardens of two storey residential developments surround the site on all sides.

Strategic Planning Factors The site has moderate accessibility to public transport (PTAL 4).

The site is occupied as a bowls club. The site is surrounded by residential properties.

Current use Bowls Club.

Use suggested / organisation Residential and Bowls Club - Kossway Ltd on behalf of Southey Bowls Club

Council’s preferred use Bowls club and residential

Delivery timescale 2013 – 2017 as suggested by Kossway Ltd.
**Issues**

The site is occupied by a bowls club which has circa 200 members. Southey bowling club wish to redevelop part of the car park to fund a new clubhouse on the site, improve the bowling club facilities and secure the financial future of the club.

There should be no loss of sporting facilities for which there is demand.

Redevelopment proposals should protect the residential amenity of the surrounding occupiers, especially with regard to privacy.

Redevelopment proposals may need to consider secondary access to the site.

Mitigating parking, traffic and road safety impacts on neighbouring streets and local amenity.

**Summary of consultation responses**

Issues were raised from various parties during the consultation stage and are summarised generally as follows (abridged):

- Parking, traffic, access and congestion on the site and surrounding area
- Restrictive land covenants on the site preventing any use other than bowling or tennis
- Loss of open space, privacy, shadowing, residential amenity and overcrowding on adjoining landowners and occupiers
- Loss of the bowling/leisure activity
- Lack of supporting infrastructure in surrounding area, namely schools and doctors surgeries
- Potential impact on land values

**Further research**

Southey Bowls Club wish to develop the western portion of the site (car park and existing clubhouse) for residential use in order to deliver a new clubhouse on the site and to secure the survival of the club. The bowling green would remain as is. Southey Bowls Club anticipates a new clubhouse which can also be used for community purposes to be located centrally, adjacent the bowling green which will be retained. The club believes that their proposal will not breach any existing covenant or other legal restrictions.

There is a covenant that exists for this site (and other sites in the area) that restrict its use as a nursery garden.

**November 2012:** The site was assessed in an external report commissioned by the London Borough of Merton for its suitability as a school but was rejected on grounds of restricted access and adjoining residential properties.
Schedule of changes from the Stage 2a consultation document

- Amend the ‘issues’ and ‘use suggested’ descriptions with regard to the use suggested by the Southey Bowling Club
- Clarification that secondary vehicular access to the site is not available. The site has existing pedestrian linkages with Kingston Road and Abbott Avenue which are maintained by the bowling club
- Addition of ‘summary of consultation responses’ section
- Addition of ‘further research’ undertaken by the council section
- Consequential amendments through the document
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26 Bushey Road
Raynes Park Service Station, 26 Bushey Road, Raynes Park, SW20 8LW

Site Proposal 77

Site area 0.33 ha

Site description
The site is long and narrow, with a single point of entry from Bushey Road.

The site contains a disused service station toward the Bushey Road entrance which is currently being utilised as a hand car wash. Behind the service station are smaller commercial units generally occupied by small vehicle repair related businesses.

The site is generally surrounded on both eastern and western boundaries by the rear gardens of two storey residential properties. To the north of the site is a long narrow warehouse utilised as an image processing and data storage facility accessed via Kingston Road. To the south of the site on the opposite side of Bushey Road is a place of worship, and a parade of retail shops with residential dwellings above.

Strategic Planning Factors
The site had permission for eleven light industrial units, which lapsed in 2011.

Part of the southern section of the site is susceptible to surface water flooding.

The site has a medium level of access to public transport (PTAL 3)

Current use Vehicle repair, maintenance, sales and valet
Use suggested / organisation
Residential - Kingsley Nicholas & Ward on behalf of Rightway Corporation Limited

Council’s preferred use
Residential

Delivery timescale
2013 – 2018

Issues
Site access arrangements require careful scrutiny/improvement.

Parts of the site are contaminated by its previous use as a petrol station and ongoing use for vehicle repairs. Development proposals will need to decontaminate the site.

Mitigating potential parking, traffic and safety impacts on neighbouring streets and local amenity.

Remediation measures will need to be investigated following decommission of the former petrol station use.

Protecting the residential amenity of adjacent properties through sensitive design.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with surface water flooding.

Summary of consultation responses
Issues were raised from various parties during the consultation stage and are summarised generally as follows (abridged):

- Issues with the loss of open space, privacy, overcrowding, sunlighting and noise on adjoining properties
- Lack of infrastructure including parking, health services and schooling
- The site is not a suitable size or shape for residential development
- The site should be used for a school with secondary pedestrian access provided via the land between 424 and 448 Kingston Road (site 41)
- Potential loss of vegetation on the site
- Potential contamination issues

Consultation was carried out in 2007 relating to a planning application for light industrial units on the site. The responses received to the planning application did not support light industrial uses on the site, generally for reasons of noise, smell and safety.

Further research
The site was allocated in Merton’s Unitary Development Plan 2003 as being suitable for light industrial uses, office, research and development. Planning permission was sought in 2004 for additional light industrial
units. The planning application was refused on design grounds and an appeal was rejected. A revised planning application was submitted for eleven light industrial units in 2006, which was refused by the council in March 2007. The owner appealed the decision and the appeal was allowed in November 2007. The eleven industrial units were not built; the owner cited the recessionary environment from 2008 onwards as restricting available finance and potential for tenants.

Merton’s Economic and Employment Land report 2010/11 and Merton’s Economic Narrative 2012 do not support office development on this site.

The site is contaminated from its former use as a petrol filling station and its ongoing use for vehicle repairs. The petrol filling tanks remain in situ underground. The site would need to be decontaminated as part of any proposal.

The site is not currently deliverable in conjunction with site 41 (Kingston Road opposite Lower Downs) because there is an area of land in separate ownership situated between the two sites that is not sought for redevelopment.

**November 2012:** The site was assessed in an external report commissioned by the London Borough of Merton for its suitability as a school but was rejected on grounds of size, access and contamination issues.

**Schedule of changes from the Stage 2a consultation document**

- Addition of a ‘summary of consultation responses’ section
- Addition of a ‘further research’ section
- Consequential improvements throughout the document.
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E - 2. Raynes Park - Town Centres and Neighbourhood Parades

This section provides information about the Town Centres and neighbourhood parades of Raynes Park.

If you would like to comment on any of the proposed changes please refer to the both the site name, designation (i.e. Neighbourhood Parades) and ID where relevant.

Town Centre:

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
<th>Town Centre Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>RAY01</td>
<td>Raynes Park</td>
<td>Local</td>
</tr>
<tr>
<td>MOT01</td>
<td>Motspur Park</td>
<td>Local</td>
</tr>
</tbody>
</table>

Neighbourhood Parades:

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Coombe Lane, West Wimbledon</td>
</tr>
<tr>
<td>24</td>
<td>Wimbledon Chase</td>
</tr>
</tbody>
</table>
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E - 3. Raynes Park - Metropolitan Open Land (MOL)

Officers have assessed all Metropolitan Open Land (MOL) boundaries in Merton and identified four small anomalies; the detailed maps for which are presented overlap. We are now asking councillors for comments and recommending that these anomalies be presented for consultation and discussed with the Mayor of London.

London Plan policy 7.17 set out the Mayor of London’s definition of Metropolitan Open Land:

“To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:

a) it contributes to the physical structure of London by being clearly distinguishable from the built up area
b) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London

c) it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value

d) it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.”
Policies Map
MOL
COTTENHAM PARK ROAD

January 2013

Key

<table>
<thead>
<tr>
<th>Color</th>
<th>Description</th>
</tr>
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<tr>
<td>Red</td>
<td>UDP 2003 MOL</td>
</tr>
<tr>
<td>Green</td>
<td>Proposals 2013 MOL</td>
</tr>
</tbody>
</table>

London Borough of Merton
Merton Civic Centre, 100 London Road, Morden, Surrey SM4 5DX
Tel: 020 8543 2222
E - 4. Raynes Park - Green Corridors

The London Plan 2011 defines Green Corridors as: “...relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.”

The GLA’s Urban Greening and Biodiversity Officer supports the approach of a local review of Green Corridor boundaries which defines its own criteria with reference to paragraphs 1.2.17 & 18 in Appendix A of the Mayor’s Biodiversity Strategy (see below). He stressed that as part of the review the council should consider the importance and necessity of each portion of land to be designated as Green Corridor with regards to its central function (enabling species movement).

A1.2.17 Green corridors are relatively continuous areas of open space leading through the built environment and which may link sites to each other and to the Green Belt. They often consist of railway embankments and cuttings, roadside verges, canals, parks, playing fields and rivers. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

A1.2.18 There are special criteria for the recognition of land as part of a corridor network, which are detailed in the former London Ecology Unit’s Advisory Note 6 and summarised here. The essential tests are habitat composition and near continuity. The minimum habitat requirement is a natural surface: water or vegetation. The corridor network connects to the countryside (Green Belt or Metropolitan Open Land). Small discontinuities, such as division by a road, are allowed, but larger gaps are fatal. Most blocks of back garden land are isolated from the network, but sometimes they adjoin it, or the gap is small enough for them to be included. Corridor elements are not required to be any particular shape, to link sites, or link together into any particular geometry.

Officer have sought the advice of the Merton Biodiversity Group and have made site visits to assess areas where the gaps may be fatal for the continuity of the Green Corridor.

It is worth noting that the London Ecology Unit’s Advisory Note 6: Green Corridors in London states that: “Terrestrial habitats are inherently more discontinuous than running water. Here the size of the gap allowed is more stringent. A common situation is a road or rail-side habitat strip cut by the tarmac of a road; here the corridor is allowed to continue, provided that the cut ends of the corridor facing each other over the gap are (no) more than a few metres wide.”

The maps show the proposed changes which result in an approximately 10ha net reduction in total area. However modern GIS technology allows for a much more detailed assessment than the 1in10,000 aerial photography analysis that was used for the 2003 Proposals Map.

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>GC01</td>
<td>Beverley Park</td>
</tr>
<tr>
<td>GC04</td>
<td>Merton Park Railsides</td>
</tr>
<tr>
<td>GC15</td>
<td>Raynes Park High School</td>
</tr>
<tr>
<td>GC16</td>
<td>Raynes Park Railsides</td>
</tr>
<tr>
<td>GC17</td>
<td>Raynes Park Railsides to Motspur Park</td>
</tr>
</tbody>
</table>
Raynes Park - Local Nature Reserve

Unlike Sites of Importance for Nature Conservation, Local Nature Reserves are statutory nature conservation designations of land owned, leased or managed by Local Authorities and designated under the National Parks and Access to the Countryside Act. They are sites of some nature conservation value managed for educational objectives but do not qualify for Site of Special Scientific Interest (SSSI) status. In some cases Local Nature Reserves are managed by a non-statutory body (e.g. London Wildlife Trust) and Local Authorities have the power to pass bylaws, for example, access control or special protection measures. Only one new Local Nature Reserves is being proposed and that is the Derwent floodwash (owned and proposed by Wandsworth Council).
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E - 5. Raynes Park - Opens Space

Merton’s current Proposals Map (adopted 2003) only contains open spaces that are over 0.4 hectares (1 acre) in size. Any smaller portions of protected open spaces, such as those on school sites, are listed in Schedule 2 of the UDP.

It is proposed that there is no minimum threshold for showing designated open spaces on the 2013 Policies Map (formerly known as the Proposals Map) as it will eventually be a digital online map, on which viewers will be able to zoom in to any particular site. The 2013 Policies Map will therefore require a much higher level of accuracy that the 2003 Proposals Map.

It is important to note that the primary function of the Policies Map is to “...illustrate geographically the application of the policies...” (Local Planning Regulations 2012) and that all planning policies have to be deliverable. As planning permission is not required for much work in or adjacent to a highway or in residential back gardens, draft planning policy DM O1 Open Space can not protect these green open spaces and the policy can therefore not be delivered in these areas.

To enable consistent decision making on the exact locations of the proposed designated open space boundaries, officers have developed the following criteria which take the definitions of ‘open space’ in the National Planning Policy Framework (NPPF) and the London Plan 2011 as a starting point:

The definition of ‘open space’ in Annex 2 of the NPPF is: “All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.”

The definition of ‘open space’ in the London Plan 2011, p.305, is: “All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.”

Inclusions:
All open spaces within the borough such as parks, commons, play grounds, sports fields (including MUGAs, bowling greens), allotments, cemeteries and churchyards, urban farms and woods that are not specifically excluded below.

Buildings within open spaces that are ancillary to the use of the open space (e.g. changing rooms).

Large soft landscaped open spaces within school grounds (e.g. playing fields) and (hard) demarcated playing pitches (e.g. netball courts), including ancillary school buildings or hard standing (e.g. car parks) not in the immediate vicinity of the main school building.

Exclusions:
Main school buildings (These parts of the site are predominantly developed and the school use is not ancillary to open space.)

The hard standing and ancillary buildings surrounding the main school buildings (These areas form part of the site which is predominantly developed, where the non-ancillary use is most intense.)

Private residential gardens (The primary use of these properties is residential and they would therefore not conform to the London Plan definition. Furthermore, due to the extensive amount of development that is allowed on residential gardens without the requirement for planning permission, draft policy DM O1 Open Space
Policies Maps | Raynes Park

will not be deliverable in these areas. It is also worth noting that residential back gardens are explicitly removed from the definition of ‘Previously Developed Land’ in the NPPF and in accordance with paragraph 53 of the NPPF, Core Strategy Policy CS 13(e) resists development on them.

Soft landscaped areas associated with blocks of flats or housing estates, which have a sense of enclosure and privacy
(These sites are usually predominantly developed with various areas of soft landscaped amenity space to serve the occupants. These areas of soft landscaping would not conform to the London Plan definition.)

Public and private highways as listed on the Streets Register (which usually include the pavements) and opens areas that are part of, or essential to the prevailing character of the area (such as parcels of land within St Helier Estate).
(Most works in or adjacent to a highway do not require planning permission and therefore draft policy DM O1 Open Space will not be deliverable in these areas. In some neighbourhoods there are small open spaces that are integral to the design of the original townscape layout and although they might appear to be part of the highway, they are not on the Streets Register. These open spaces are protected from development by means of the design policies and do not warrant safeguarding by means of designation on the Policies Map.)

Land along operational rail reserves (with restricted public accessibility or limited visual amenity value).
(These areas are usually predominantly developed with narrow strips of vegetation on either side and would therefore not conform to the London Plan definition. Although they might provide some “visual amenity”, due to the restricted access they would not “offer important opportunities for sport and recreation”. The majority of these areas are however protected for their nature conservation value as Green Corridors.)

Very small areas (typically less than a quarter of an acre/0.1ha) of green open space which, as a result of a qualitative assessment, are considered to have too restrictive access or are of a size or shape which result in them having a very limited functional use as open space and therefore do not warrant safeguarding by means of designation on the Policies Map.
(Although these areas might provide some “visual amenity”, they would not also “offer important opportunities for sport and recreation”. Officers have judged these opens spaces to have limited public value and they therefore do not warrant safeguarding by means of designation on the Policies Map.)

Buildings, and their adjoining land, on the edge of open space of which the primary use is not ancillary to the use of open space.
(These sites would not conform to the London Plan definition.)

Site ID numbers generally reflect the main usage type of open space as per the following prefixes:

A = Allotments
P = Playing Pitches
C = Cemetery
S = School Open Space
M = General Open Space/ Park
W = Wildlife/ Nature Reserve

As open spaces frequently meet one or more categories these categories are indicative of the function only.

To illustrate more than 200 open spaces clearly and concisely, the borough has been divided 5 areas and a grid of 14 parts. To request a more detailed map of any of the proposed designated open spaces listed below please contact the Future Merton team by telephone on 020 8545 3837 or by e-mail at ldf@merton.gov.uk
If you would like to comment on any of the proposed changes please refer to the both the site name, designation (i.e. Open Space) and ID where relevant.

<table>
<thead>
<tr>
<th>Grid Reference</th>
<th>Site ID</th>
<th>Name</th>
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<tbody>
<tr>
<td>C1</td>
<td>A012</td>
<td>Canon Hill Common Allotments</td>
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<tr>
<td>C1</td>
<td>M046</td>
<td>Raynes Park Sports Ground</td>
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<tr>
<td>C1</td>
<td>M047</td>
<td>Cannon Hill Common</td>
</tr>
<tr>
<td>C1</td>
<td>M087</td>
<td>Bushey Court Park</td>
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<tr>
<td>C1</td>
<td>M091</td>
<td>Crossway O/s</td>
</tr>
<tr>
<td>C1</td>
<td>P002</td>
<td>Raynes Park Playing Fields</td>
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<tr>
<td>C1</td>
<td>P004</td>
<td>Sun Alliance Sports Ground</td>
</tr>
<tr>
<td>C1</td>
<td>P005</td>
<td>Malden Golf Course</td>
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<tr>
<td>C1</td>
<td>P006</td>
<td>London Electricity Sports Ground (LESSA)</td>
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<tr>
<td>C1</td>
<td>P007</td>
<td>Playing Field Wimbledon College</td>
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<tr>
<td>C1</td>
<td>P014</td>
<td>Raynes Park, Lawn Tennis Club</td>
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<td>C1</td>
<td>P015</td>
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<td>P020</td>
<td>Civil Service Sports Ground</td>
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<tr>
<td>C1</td>
<td>P021</td>
<td>Beverley Park Golf Range</td>
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<tr>
<td>C1</td>
<td>P022</td>
<td>Prince Georges Fields</td>
</tr>
<tr>
<td>C1</td>
<td>P023</td>
<td>Messines</td>
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<td>C1</td>
<td>P034</td>
<td>The David Lloyd Club</td>
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<tr>
<td>C1</td>
<td>P036</td>
<td>Playing Fields (Former St Catherine's)</td>
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<td>S008</td>
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<td>S044</td>
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<td>C1</td>
<td>S058</td>
<td>Sacred Heart Catholic Primary School</td>
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<tr>
<td>C1</td>
<td>W007</td>
<td>Rookwood Open Space</td>
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</table>
E - 6. Raynes Park – SINCS

The London Plan identifies the need to protect biodiversity and to provide opportunities for access to nature. It recommends identifying and protecting a suite of sites of importance at Metropolitan, Borough and Local level in order to protect the most important areas of wildlife habitat in London and provide Londoners with opportunities for contact with the natural world. The Mayor’s Biodiversity Strategy sets out criteria and procedures for identifying such land for protection in Local Development Frameworks.

The London Wildlife Sites Board has developed a process by which London Boroughs should select and approve SINCs. Boroughs are not obliged to follow this process but if another process is used, it must conform to the policy framework described by national and regional policies.

Officers recommend the continuation of the use of the London Wildlife Sites Board process as it requires robust evidence to be presented for their expert assessment.

The last SINC survey of Merton was carried out by the GLA Biodiversity Team in 2006. The mapping results of this survey have been provided by the Greenspace Information for Greater London (GiGL), which is the data custodian of SINCs data for the London Wildlife Sites Board.

Although all the SINC sites are shown on the accompanying maps, it is proposed that only the aforementioned 2006 amendments, which are listed in the table below, be used to update the 2003 Proposals Map SINC designations.

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Name</th>
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</tr>
</thead>
<tbody>
<tr>
<td>MeBI07 (Amended)</td>
<td>Malden Golf Course and Thames Water Pipe Track in Merton</td>
<td>1</td>
</tr>
<tr>
<td>MeBI09 (Amended)</td>
<td>Atkinson Morley’s Hospital Woodland</td>
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<tr>
<td>MeBI10 (Amended)</td>
<td>Cannon Hill Common</td>
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<tr>
<td>MeBI101E (Amended)</td>
<td>Railsides west of Wimbledon station</td>
<td>2</td>
</tr>
<tr>
<td>MeBI101F (Amended)</td>
<td>Sutton line south of Wimbledon</td>
<td>2</td>
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<tr>
<td>MeBI105 (Amended)</td>
<td>Beverley Brook in Merton</td>
<td>2</td>
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<tr>
<td>MeBI113 (Amended)</td>
<td>Prince George’s Playing Field</td>
<td>2</td>
</tr>
<tr>
<td>MeBI114 (Amended)</td>
<td>Coombe Wood (Merton section)</td>
<td>2</td>
</tr>
<tr>
<td>Mel13 (Amended)</td>
<td>The Chase</td>
<td>L</td>
</tr>
<tr>
<td>Mel19 (Amended)</td>
<td>Raynes Park Sports Ground Conservation Area</td>
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## E - 7. Raynes Park – Transport Proposals

<table>
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<tr>
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</thead>
<tbody>
<tr>
<td>Cycle Network</td>
<td>22TN</td>
<td>Borough-wide cycle network</td>
</tr>
</tbody>
</table>

These detailed maps are available under each of the five areas: Colliers Wood, Mitcham, Morden, Raynes Park and Wimbledon.