

CW/P4477
26 February 2013

Strategic Policy and Research
Future Merton
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For the attention of Ms Tara Butler

Dear Tara

London Borough of Merton – Draft Sites and Policies Development Plan Document and Draft Proposals Map – Final Consultation

Further to our representation on behalf of Workspace Group to the Sites and Policies DPD – Planning Ahead consultation in May 2012, we wish to submit the following representation in relation to the draft Sites and Policies DPD.

As outlined in previous representations, Workspace Group owns and manages approximately 100 sites in and around London, and provides approximately 4,000 entrepreneurs and SME's with the commercial environment they can thrive. Accommodation is available in a vast range of sizes, down to as small as 500 sq ft, and is leased on flexible terms, allowing small businesses the opportunity to expand without onerous property obligations.

Part 2E Raynes Park - Potential Sites for Development and Draft Policies Map

We recognise that the Rainbow Industrial Estate has not been included within the Sites and Policies DPD as a result of the identification in the Merton Core Strategy Economic Development Policy 12 and within the support text, paragraph 20.16.

The Draft Sites and Policies DPD explains in Part 2 Raynes Park potential sites and draft policies map that:

“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- *The site has been withdrawn by the person or organisation that originally suggested the site;*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*

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- local community through a development brief;*
- *The site is already the subject of a live planning application;*
 - *The site already has planning permission for its potential use so to allocate it for the same use would not provide any greater certainty or benefit than currently exists.”*

A draft planning brief has been prepared as a supplementary planning brief (SPD) to Merton's Core Planning Strategy to provide guidance for the redevelopment of the Rainbow Industrial Estate in Raynes Park. It is a consultation document which puts forward an approach to deliver an employment led mixed use development of the site. The planning brief went out for public consultation for 6 weeks starting on 13 June 2012 and closed on 25 July 2012.

The proposals for the site are to provide:

- Enhanced and improved business floorspace on the site as light industrial and office units, designed to cater for small and medium enterprises;
- Maintain the current level of business floorspace (3,390sqm);
- Increase the number of jobs on site from 50 to over 100 people;
- 200-250 new homes, including affordable housing;
- A new 'kiss-n-ride' and widened access on the Raynes Park Station forecourt;
- A reconfigured and improved entrance to the site from Grand Drive.

Whilst it is noted that the second bullet point can be applied to the Rainbow Industrial Estate it is considered that this point needs to be made clear within the adopted version of the Sites and Policies DPD.

Preferred Option 1

It is therefore suggested that the Rainbow Industrial Estate should be identified in Part 2 of the Sites and Policies DPD and within that site allocation, the level of flexibility is afforded to that within the Merton Core Planning Strategy (2011) because it does not say it should be a 'Locally Significant Industrial Site' but states through the adoption of a planning brief for the whole site that "a wider range of uses than B1(b) research and development), B1(c) (light industrial), B2 (general industry) and B8 (warehousing and storage) may be considered where these uses contribute to the site delivering CS12 and meets the terms of other policies in the development plan for Merton" to ensure consistency in all of the Local Development Framework documents. Therefore, the site should be allocated for X employment led regeneration based on the points listed above.

Preferred Option 2

Alternatively, it is suggested that reference be made to an appendices which includes a list of all sites specifically incorporated within the core strategy for further clarification.

Suggestion

Amend the second bullet point to read:

- *The potential uses for the site are set out in other documents for e.g Merton's Core Planning Strategy (see appendix X for a list of sites) and redevelopment of the site is already in progress in conjunction with the local community through a planning brief.*

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Incorporate an appendix which includes all of the sites identified within the core strategy e.g Rainbow Industrial Estate, Gap Road etc.

I trust that the enclosed representations will assist with your formulation of the Draft Sites and Policies Development Plan Document and Draft proposal map. We look forward to hearing your views in relation to the above in due course. In the meantime, we would be grateful for your confirmation that the above representations have been received and will be considered as part of the preparation of the Sites and Policies DOD.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Wilkinson', is written over a light grey rectangular background.

Claire Wilkinson
Rolfe Judd Planning Limited

cc Jonathan Shelton Workspace Group Plc