

Planning application: 20/P1688

Application Site: 208-212 Burlington road, New Malden (West Barnes Ward)

On behalf of the Committee of Raynes Park and West Barnes Residents Association (RP&WBRA), I submit this OBJECTION to the above Planning application.

OVERVIEW

At present the Application Site is an Auto Repair and MOT facility set back from the Burlington Road frontage. All the buildings on site would be demolished.

The basic scheme is to construct a block of flats in effect 7 storey in height, with a retail unit at ground floor level at the top end of Burlington Road near Shannon Corner roundabout. The location is described by Merton Council as a 'scattered employment site' mainly a mix of light industrial and some retail use. Whatever one feels about the need for more housing (as we will try to demonstrate below) the application site is not one which could be deemed desirable for residential development least of all a high-rise block of flats incorporating 'family' units.

We wish to make clear that RP&WBRA is fully supportive of Merton delivering the current target of new homes in the Borough subject to the proviso that they are built broadly in compliance with both Local and National Planning Guidance.

These targets are set out in the Mayor of London's adopted London Plan 2016. It is worth adding that in recent years these targets have in fact been exceeded in a large proportion of cases by development on so called 'windfall' sites. These are found by builders rather than the Council.

There are several reasons why the proposals in this application are - putting it mildly - less than wholly desirable not so much because they would cause harm to neighbours immediately alongside (they are few in number) rather than the simple fact that the applicant has chosen a site which is unsuitable for almost any type of residential use.

The top end of Burlington Road is NOT a normal residential area. A new seven story building would hardly fit the local scene which is largely 2 or 3 storey. The location is well known to have very poor air quality - ask the children at Sacred Heart School opposite the site - and no wonder with heavy traffic crawling along and often standing still waiting to get over the Railway level crossing! Add to that the site is in a Flood Zone. Shannon Corner nearby is one of the lowest points in Raynes Park in terms of height above sea level. After heavy rain there is frequent 'flash' flooding in this area.

The location is not well served by public transport and the two railway stations are well beyond convenient walking distance - see below under PTAL.

The area is supposed to be an employment location. The applicant has changed his original intention for a flat on the ground floor to a retail unit > He should have known that you do not have bedrooms on the ground floor on a site prone to flooding. But there is no indication what type of retail unit would emerge and there is suspicion the employment numbers would in fact decrease.

There is an electricity Sub Station alongside the application site . There is plenty of evidence that living so close to a Unit like this can cause havoc with radio, phone and broadband reception. And then there is the A3 Flyover not far away - see below!

Taking into consideration all the above we Object to the proposals based on conflict with the relevant Planning Guidance as quoted.

Merton SITES AND POLICIES PLAN July 2014 (SPP) and
Merton LDF Core Planning Strategy July 2011 (CPS)

DESIGN

The building would fail to relate positively and appropriately to the scale , density, proportions and height to development in the nearby area and would fail to protect nearby residents (in particular in Barnard Gardens) from visual intrusion in conflict with Policies DM D 1 and DM D 2

SPP and Policy 14 CPS. Also the Density of the scheme at 373 habitable rooms / hectare is well above recommended levels .

TALL BUILDINGS

From several sources a tall building is one which is “ substantially taller than their surroundings” . Since most of the buildings in the nearby surrounding area are 2 or 3 storey in height this would be a tall building equivalent to seven storey . Also tall buildings are normally restricted to Town Centre locations . The site is nowhere near a Town Centre .

There is clear conflict with Policy CS 14 CPS and emerging Policy LDP 5.1 Merton draft Local Plan October 2018.

HOUSING MIX

In very round terms the requirement from Merton for residential schemes is a one third proportion for 1, , 2 and 3 bed units. The proposals for three bed flats is well short of the requirements in conflict with Policy DM H 2 SPP.

That said we regard the site as unsuitable for almost ANY type of residential use and - for environmental reasons - even less desirable for families with children .

FLOODING RISK

The application site is within the fluvial flood Zone Two area and therefore at risk of flooding. The whole of the area around Shannon Corner is one of the lowest points of West Barnes Ward in terms of height above sea level. The applicant has proposed that the rear of the site would be lower than the pavement level which would exacerbate the risks from flash flooding.

As a scheme for residential use , under the Planning Guidance regulations , there is a requirement for the applicant to apply a SEQUENTIAL TEST (to find an alternative site NOT in a flood zone) There is no evidence of this having been done.

We submit that the site is clearly unsuitable for housing development and as a consequence is in conflict with Policy CS 16 CPS and Policy DM F 1 SPP.

LOCAL EMPLOYMENT

In terms of land use designation the site is classified as a Scattered Employment Location. The applicant has suggested that the ground floor of the block would be a retail unit. However there is no evidence of what type of shop this would be or whether (as seems very probable) employment numbers would be protected let alone increased. We submit that the proposals would be in conflict with Policy DM E 3 SPP.

PUBLIC TRANSPORT ASPECT

The site is not well served by the local bus network and is beyond reasonable walking distance of both Raynes Park and Motspur Park Railway Stations. In consequence the site is deemed as having a low Public Transport Accessibility Level (PTAL) rating of between 2 and 3 on a scale from 1 the lowest to 6 at the highest.

WE submit that the scheme would be in conflict with Policy DM D 2 SPP.

CLIMATE CHANGE

Set against the relatively limited benefits the scheme would deliver there CAN be no doubt it would come with a rather large CARBON FOOTPRINT.

Years ago the Planning Department at Merton, to their enormous credit, created the MERTON RULE which has been adopted widely across the UK. The Rule sets a target that large schemes should aim to meet 10% of the energy requirements of a project from renewable sources.

The design of the proposed building would probably make it impossible to install photovoltaic panels and the cramped nature of the site (plus contamination in the ground) would make it very difficult - and probably impossible - to use ground source heat pumps.

Add to this there seem to be no proposals for water saving or even 'grey water' recycling.

We therefore conclude that whole scheme would drive the Borough of Merton in the WRONG DIRECTION towards its aim to be CARBON NEUTRAL in only 30 years time and therefore in conflict with the broad aims of Policy DM D 2 of Sites and Policies and Policy CS 15 of the Core Strategy.

ENVIRONMENT

In the light of earlier applications in the area it has been clearly established that the application site has very poor air quality. This stems from the fact that traffic is flowing off the A3 down Burlington Road so much of the day belching out carbon dioxide and nitrous oxide gases. WE submit that this is not a suitable location for families to live and the proposals are in conflict with the broad aims of Policy DM D 2 of the Sites and Policies Plan. We trust the Environmental Health team at Future Merton will take readings at the site and publish the results on the Planning Explorer.

SAFE DRIVING

We note that the application site is only some 50 m away from the A3 flyover. Whilst this not a motorway in some respects it is similar. Advertising on motorways is not permitted for good and obvious reasons. We submit that the height of the flats would enable drivers on the flyer to see the top 3 or 4 floors of the building.

The design is such that the reception rooms with ' pillar box 'balconies would face the flyover. At night with these rooms lit , and in summer people out on the balconies we believe this could cause a distraction to drivers in particular going South. In that sense the proposals are unsafe. And finally

CORE PLANNING STRATEGY POLICY CS 14

To quote " All development s need to be designed in order to respect, reinforce and enhance the local character of the area in which it is located ".

WE submit that set against that test alone the proposals would be a total failure.

On behalf of the RP&WBRA for all the reasons outlined above I urge the Planning Applications Committee to REFUSE this application . Thank you for your time .

David Freeman, Vice-Chairman, RPWBRA, 13/11/2020