MERTON COUNCIL futureMerton

# Planning Brief Rainbow Industrial Estate

Supplementary planning document to Merton's Core Planning Strategy 2011



www.merton.gov.uk/ldf

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#### 1.0 Introduction

**1.1** The purpose of this planning brief is to provide a planning and design framework to guide the redevelopment of Rainbow Industrial Estate, as a supplementary planning document in accordance with Merton's Core Planning Strategy. Once adopted, planning applications received for the site will be expected to be in accordance with this planning brief.

**1.2** This site is located to the south of Raynes Park Local Centre between three railway embankments. The whole site is approximately 4.8 acres and is currently occupied by approximately 3,400 sqm of industrial, waste management, and storage space and Network Rail operational lands. **1.3** A draft planning brief was published for consultation between June and July 2012. Feedback from the consultation led to a complete review of the approach taken to producing the brief, a review of the potential land uses, transport and traffic existing and predicted patterns, infrastructure provision and design guidance. This has informed the final brief.

**1.4** The proposals for the site are for its redevelopment to provide approximately 3,400 square metres of business floorspace for Small and Medium sized enterprises (SMEs), a publicly accessible drop-off point (Kiss and Ride) serving Raynes Park station enabled by up to 250 new homes.

#### Figure 1.1 Location context



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# 2.0 Background

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#### 2.0 Background

#### Merton's core planning strategy

2.1 TThe Rainbow Industrial Estate is designated in Merton's Core Planning Strategy (Policy 12 - Economic Development)as a Locally Significant Industrial Area, stating:

In recognition of the site-specific circumstances relating to the Locally Significant Industrial Sites at Rainbow Industrial Estate and Gap Road, a wider range of uses than B1(b), B1(c), B2 and B8 [research and development, light industrial, heavy industry and storage] may be considered for each of these estates where these uses contribute to the site delivering policy CS12 and meet the terms of other policies in the development plan for Merton. Any proposal seeking to incorporate uses other than B1(b), B1(c), B2 and B8 would be subject to the adoption of a planning brief (supplementary planning document) for the whole site, setting out [how] any employment-led redevelopment would proposals would meet the terms of policy CS12 and the objectives of Merton's Economic Development Strategy.

**2.2** In her report on Merton's Core Planning Strategy, the independent planning inspector noted:

- the opportunities that could arise through redeveloping the sites to improve access to the sites, make more efficient use of the sites and improve the way they function;
- the physical challenges involved in redeveloping these sites,
- the low returns generated by SME business floorspace
- the importance of maintaining employment uses on these sites
- the necessity of securing

cross-subsidy from higher value uses in order to deliver new employment floorspace on the sites.

**2.3** The council considered a range of alternative uses for the estate in drafting the planning brief and assessed these uses against the objectives of Merton's Economic Development Strategy, Policy CS12, their suitability for the site and their deliverability. These are set out in Appendix 1.

**2.4** During June-July 2012, a draft planning brief (supplementary planning document) was published for the site containing proposals for wholescale redevelopment of the estate which can be summarised as:

- Retention of the quantum of employment floospace on the site: (3,400 square metres (36,500 square feet)) of employment floorspace, catering for SMEs laid out in a two-storey workshop/studio / office arrangement.
- An improved entrance with a publicly accessible drop-off point (Kiss and Ride)
- Between 200 and 250 new homes laid out in three main buildings, ranging between 4 and 6 storeys in height
- Sustainably designed development, using Sustainable Drainage Systems, high standards of energy efficiency, and considering combined heat and power
- Providing all parking on-site and reducing traffic from the site, especially for HGVs

### 2.0 Background

## Consultation on the draft planning brief (July 2012)

**2.5** Between June and July 2012, public consultation took place on a draft planning brief for the Rainbow Industrial Estate. The consultation documents and the responses received are available on Merton's website: <u>http://www.merton.gov.uk/environment/designandconservation/design/rainbow\_estate/rainbow-consultation.htm</u>:

**2.6** The key issues that arose at consultation included:

- Relationship between the landowner Workspace and Merton Council
- Traffic impacts
- Parking
- Layout and design.
- Density of housing
- Impact on local schools and associated infrastructure
- Whether the site should be in employment use, residential use, a mixture of both or an alternative use

**2.7** All consultation responses have been considered in drafting the final brief. Actions that have been taken as a result of the consultation feedback include:

- Greater clarity on the reasons for undertaking the planning brief has been included in the final brief, which has been drafted by Merton Council officers
- Traffic impacts and parking: the council has thoroughly researched transport issues on and around the site, including undertaken a local study on movement (pedestrian

and vehicle) in the area; research into parking provision and demand in similar local developments and comparators with other similar outer London development proposals (see transport report attached to this document)

- Layout and design: the council has held two workshops with local community representatives, conducted a character assessment of the local area, and used these findings and the principles of good urban design to prepare a design report, which informs this brief
- Density of housing: the council has reviewed the housing density in line with the Mayor's London Plan and the circumstances of this site, and concludes that this density is appropriate and viable to deliver this scheme. The council has conducted an independent review of viability work presented to this scheme and is satisfied that the scheme is viable and that between 200 and 250 homes will be necessary to support a viable regeneration of the site, delivering employment floorspace and the Kiss and Ride
- Impact on local schools and associated infrastructure: the council has carried out a detailed assessment of local infrastructure to inform the proposals
- Land use of the site: Appendix 1 sets out the alternative options that were explored in developing this planning brief and the land uses for the site.





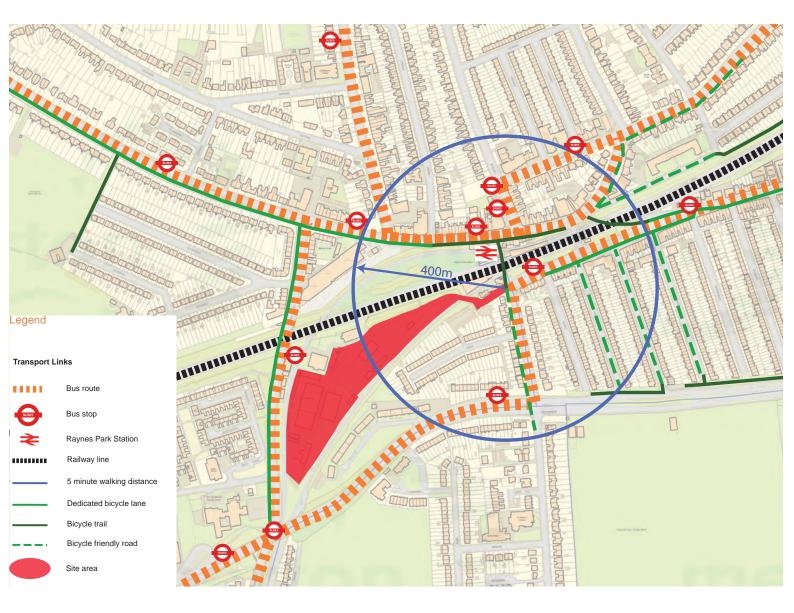
## 3.0 Site context, analysis and resulting design principles

#### 3.0 Site context, analysis and resulting design principles

#### **Raynes Park area**

**3.1** Raynes Park is a relatively affluent high quality suburban area with a mainline train station surrounded by a small Local Centre. The centre is set within an attractive and prosperous residential streets, with West Wimbledon to the north and West Barnes to the south. **3.2** The centre is divided by the elevated railway lines and embankment, and the railway line itself divides in Raynes Park with most of the shops and other commercial premises situated to the north of the railway lines.

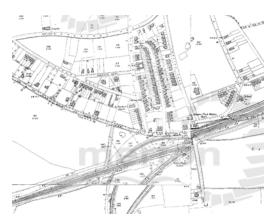
#### Figure 3.1 Access and transport links



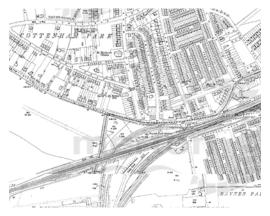
#### Figure 3.2 Historic analysis



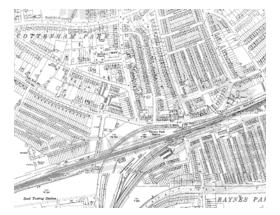




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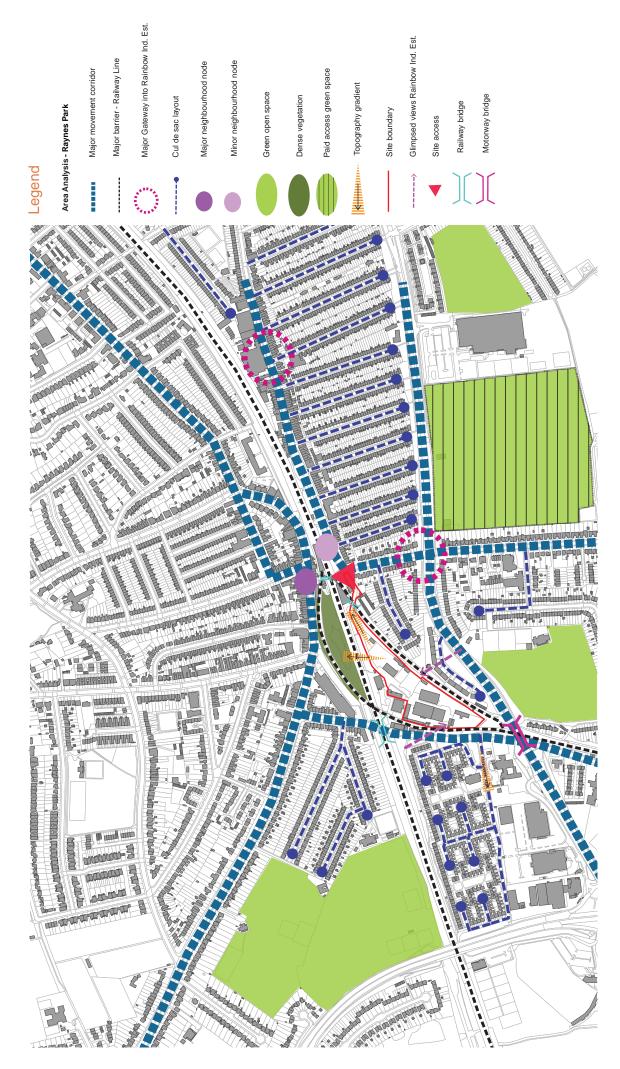


**3.3** Much of the residential development of the wider Raynes Park area took place following the station opening in 1871. Built form from the late Victorian, Edwardian, inter war and post war (which includes most of the south side of the railway) is characterized predominantly by cul-de-sacs of attractive low rise housing with features of their various areas including:

- "Apostles": closely packed cul de sacs of attractive terraced houses built in the early 20th centaury. The streets vary in style from east to west as the estate gradually expanded from Bronson Road to Gore Road over thirteen years. Each road was lengthened in subsequent years therefore in most roads there is a transition in style.
- Camberley, Abbott, Taunton and Somerset Avenue: streets of semidetached houses laid out in the 1930s just to the north of the railway, each ending in a cul de sac and all connecting to West Barnes Lane just after the railway underpass.
- Carters Estate: 400 flats and houses developed in the 1970's in a Radburn cul-de-sac layout leading on to the west side of West Barnes Lane.

**3.4** Post war and up to the present day, larger blocks of development closer to the town centre, including the post war 5-storey residential building at Langham Court, Malvern Court; 1950's development of 97 flats at Bushey Court and the recent Thames Water site redeveloped to provide a supermarket (Waitrose) and 88 apartments off Coombe Lane.

**3.5** This site is located to the south of Raynes Park Local Centre between three railway embankments and the railway station. It is largely cut off from the surrounding area, a cul de sac with limited views into the site at ground level.





#### Site entrance

The numerical references apply to the diagrams on pages 18 & 19.

**3.6** The entrance to the site lies just to the south of the Cattle Arch at the turn of Grand Drive as it joins Approach Road. (see images 1-3)

**3.7** As part of the Raynes Park Enhancement Plan, the public realm outside the station, known as the Bellmouth and the pedestrian access under the railway lines to the south, known as the Cattle Arch, have recently been enhanced.

**3.8** The entrance to the site, including the area between the railway arch almost to Grand Drive, is in Network Rail's freehold with access permitted to the freeholder (Workspace Group) and associated leaseholders.

**3.9** There is a 4.1 metre height restriction for vehicles passing under the railway bridge to enter the site. (see image 4)

**3.10** The Former Station House at the entrance to the site has had planning permission granted for the conversion of this property into three one-bedroom flats and three studio flats. This document is being prepared taking the planning permission into account. (see image 3).

**3.11** No 9 Grand Drive (the northern of a pair of semi-detached houses at the entrance to the site) is owned by Workspace Group. Part of the garden of No 9 Grand Drive will be used to widen the entrance to the site and is therefore part of the site plan. (It should be noted that this planning brief does not propose any changes to the house at No 9 Grand Drive.)

**3.12** An electricity substation lies at the end of the garden of No 9 Grand Drive, adjacent to the railway arch entrance (on the southern side). This is owned by Workspace Group and leased to EDF.

#### Within the site

**3.13** The northern site boundary is marked by high vegetated railway embankments supporting the London Waterloo- Southampton main rail line and the southbound Raynes Park station platforms. The site is bounded to the west by the single rail track northbound Epsom London Waterloo line just above ground level. The eastern boundary of the site is marked by the southbound Waterloo – Epsom rail line, descending from the 5 metre high site entrance rail arch to ground level under Bushey Road bridge. Trees and other scrub vegetation lies alongside the railway lines.

**3.14** The whole of the southern part of the site (indicated at Figure 1) is in Workspace Group's freehold ownership. This is occupied by approximately 3,400sqm of industrial and storage space, divided into approximately 17 plots of various sizes for businesses including waste management, car breakers, metal workers, and a coach park (predominantly Use Class B8 and sui generis). The current built form are of temporary structures, apart from a red brick purpose-built rail signalling building along the northern boundary of the site

**3.15** Network Rail own and occupy the freehold of the north-eastern portion of the site, which is used for signaling and Network Rail's operational requirements. This portion of the site is not part of this supplementary planning document.







































#### 3.0 Site context, analysis and resulting design principles

#### Site analysis

**3.16** High quality urban design and public realm is strongly supported the Raynes Park Enhancement Plan (and associated reports), council policy (ref Merton's Core Planning Strategy; Borough Character Study; emerging Sites and Policies Plan) the Mayor's policy and national policy.

**3.17** Although Raynes Park Local Centre itself has a strong, vibrant character, there is no recognisable character within the Rainbow Industrial Estate. Once someone has passed through the railway arch and is inside the site there are currently no distinctive features that create or reinforce a sense that the site is part of Raynes Park. The site is tightly constrained by the railway lines but the lack of existing permanent built form and the limited overlooking provides an opportunity to create character from scratch.

**3.18** The site is very accessible by a range of transport options. It is on major bus routes and is very close to Raynes Park Station. Coombe Lane (south side) has been developed as a strategic interborough cycle route, an early part of the London Cycle Network. The site has a public transport accessibility (PTAL) level of between 4 and 5 which indicates that for this site a medium/ high residential density will be acceptable supported by less than one car space per dwelling (Reference

Mayor's London Plan 2011, Chapter 6 and Mayor's Housing SPG (November 2012).

**3.19** The three railway embankments surrounding the site on all sides are designated in Merton's Development Plan as green corridors to enable the movement of animals and plants further into urban areas than might otherwise be the case. As well as supporting species habitat and movement, the vegetation surrounding the site helps to create and enhance the character of the site, softening and screening the boundary of the railway lines from within the site. (Ref: UDP 2003 NE.8 / Core Planning strategy CS13 / Sites and Policies DPD DM. O1).

**3.20** Consultation on the draft brief highlighted the need for a greater focus on design for the final brief. The Raynes Park area and the site were reassessed. Representatives from the Raynes Park Association (the neighbouring residents associations and local businesses) participated in two design workshops during late 2012 and early 2013 to inform and strengthen the design principles for the site and its entrance. The associated report is available in conjunction with this supplementary planning document. The design principles should inform development proposals for the site.



#### Major barrier - Railway Line Major movement corridor Topography gradient Steep embankment Impermeable edge Dense vegetation Motorway bridge Enclosed space Railway bridge Site boundary Hardstanding Site access Legend Site Analysis ...... 'n 2 Œ HILFLY HAVE HAVE D П F 禸 庾 T 4 4 - 14 φ 1 Па 7 A THAT 1 F P H B B T FIT-

### Entering the site from Grand Drive / Cattle Arch

**3.21** The entrance to the site, between Grand Drive and the railway underpass, will be one of the most crucial parts of the development. It will have several functions:

- It will provide the first impression of the southern side of Raynes Park local centre for people leaving Raynes Park station and exiting the Cattle Arch on the southern side, or coming north along Grand Drive.
- It will be the first sight of Raynes Park local centre to travellers coming from the east (along Approach Road / Kingston Road) or travelling north along Grand Drive
- A safe environment for vehicles to turn while dropping off and picking up passengers at the station
- A safe route for pedestrians coming from the south via Grand Drive to cross the entrance to the site and enter or exist the Cattle Arch
- The entrance / exit to the Rainbow site for vehicles, cyclists and pedestrians
- The "front door" of residents living in the Former Station House and
- Potentially a pedestrian route from new homes behind Firstways to the station

**3.22** With such a variety of different functions and the need for safe legible environment to support the range of movements, the site entrance must be attractive, good quality and well managed

**3.23** Engineering studies have demonstrated that the "Kiss and Ride" can be achieved by:

- Widening the entrance to the site off Grand Drive by removing part of the garden of No 9 Grand Drive (this house is owed by Workspace. No changes are proposed to the house itself.)
- Creating a paved, shared surface entering the site to signal traffic calming

- Removal of the existing electricity substation to the south of the entrance (the substation will be required to be reinstalled inside the Rainbow site)
- Installing a 12metre miniroundabout, a shared surface and a 2metre dedicated pavement
- Managing the area to maintain the free flow of traffic, preventing long-term parking in this area (apart from the single car parking space adjacent to the eastern side of the Former Station House)

**3.24** The public realm in this area will continue to be managed and maintained by a variety of landowners and interests including Merton Council's Highways Department, Network Rail, South West Trains and Workspace and, to a lesser extent, those involved in the Former Station House. There are a variety of solutions for enforcing traffic movement within this space including via a parking management plan by the freeholders of the estate, adoption of the road by the council, or management via Network Rail or their franchisees.

**3.25 Design principle:** the junction between Grand Drive and the entrance to the Rainbow Estate should be safe for pedestrians, cyclists, drivers and other road users. It should take the opportunity to create an attractive legible space out of what is currently a shabby, poorly maintained, somewhat hostile area.

**3.26 Design principle:** As set out in the supporting reports to the Raynes Park Enhancement Plan creating a successful, safe and attractive environment can be delivered by using urban design solutions to delivered engineered plans.

3.27 Design principle: Wherever possible urban design solutions should be sought to deliver safely, engineered plans for enhancing the area between the southern side of the Cattle Arch, the tunnel entering the Rainbow site and the Grand Drive pedestrian crossing. A safe, legible design will help the movement of people and traffic at this point, for example by using paved surfaces and kerb lines over guard rails, where it is safe to do so.
3.28 Design principle: It will be essential to

take a consistent approach to materials, and tone and strong and consistent management and maintenance of this area across the various land interests.

3.29 Design principle: Road and other paved surfaces should be consistent and coherent across this area, of good quality, well laid and well maintained.

3.30 Design principle: There should be a consistency of materials, approach and tone / pallet to the public realm between the road and pedestrian entrance at Grand Drive and south side of the Cattle Arch and the entrance to the rail archway leading into the Rainbow site (see Figure 5). It is important that the different land ownerships and interests don't result in an inconsistent, disconnected streetscene.

3.31 The transport report accompanying the Rainbow planning brief details the assessments that have been carried out to inform the brief. It also provides details on how links were explored

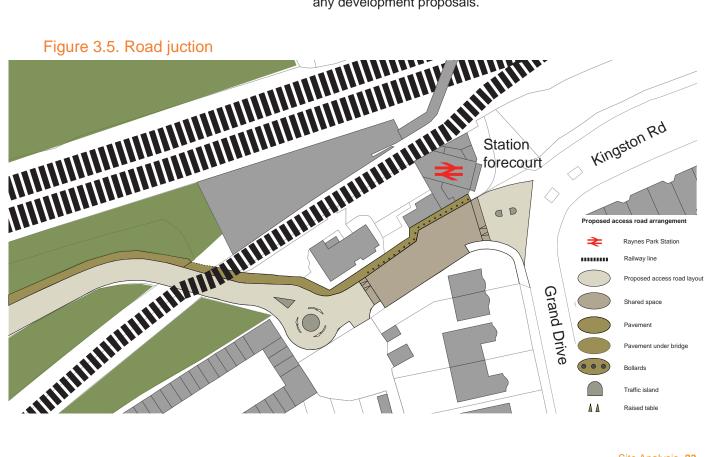
3.32 Design principle: Being adjacent to the station supports a greater density of development and the provision of more one and two bed apartments to attract young professionals working in central London or the south east or 'down-sizers' seeking quality, smaller properties with all the amenities of the local centre and transport links.

#### Through the railway bridge

3.33 The entrance to the site is via a road passing under a 5metre high, box-section railway bridge. The road is 7m wide, enough for two cars to pass each other under the bridge but HGVs and coaches using the site have to give way. The road surface is currently unpaved and a crash barrier exists on the southern side under the bridge. Pedestrian access is currently shared with the road.

3.34 The engineering diagram completed for the new proposal illustrates a road width under the railway bridge will be 7m wide, the width of an average road, allowing two cars to pass along the road's length at all points. A pedestrian footpath can be accommodated on one side at a width of 1.8 metres under the bridge, rising to 2metres wide around the corner. (the recommended pavement width for safe and inclusive street design).

3.35 The curve of the road past the Station House interrupts the sight lines from the Cattle Arch and Grand Drive, dividing the site's interior from the entrance. The dark tone of the bridge, lack of light, height of the vegetated railway embankments, and lack of visibility afforded by the curve of the road currently creates an unwelcoming sense of enclosure which must be addressed by any development proposals.



**3.36** Design principle: the railway bridge and the walls of the railway embankment emerging into the site must be kept clean, clear and well lit to create a safe, legible environment that draws people into the site.

- Lighting should take cues from the treatment of the Cattle Arch, using energy efficient and robust systems such as LED and introduce some visual interest as well as functional lighting.
- Options for safely separating the pavement from the road space should focus on street design solutions such as different surface treatments, raised kerbs (Trief kerbs) to help draw people into the site rather than guard railing or other physical barriers, where it is safe and appropriate to do so.

**3.37** The *"Light at the end of the tunnel"* project from the Cross River Partnership is a relevant reference here.

**3.38** Design principle: the opportunities can be taken to use different materials, tones etc within the site to those used at the entrance (although too great a contrast might not help the character)

#### Inside the site

**3.39** Once inside the site, the first visible buildings should act as a focal point, starting the creation of identity and sense of place and improve the site's legibility by dividing between the commercial access road (running west) and the residential part of the site (running south). The site's first impressions should be a memorable one.

**3.40** Although Raynes Park Local Centre itself has a strong, vibrant character, there is no recognisable character within the Rainbow Industrial Estate. Once someone has passed through the railway arch and is inside the site there are currently no distinctive features that create or reinforce a distinctive sense of place. The site is tightly constrained by the railway lines but the lack of existing permanent built form and the limited overlooking provides an opportunity to create a quality, distinctive, and contemporary character from scratch; a uniqueness not often found, or exploited in most development opportunities.

**3.41** Design principle: the look of the first building on entering the site will play a major role in establishing a distinctive, quality sense of place for the Rainbow site.

**3.42** Design principle: This apex of the site presents opportunities for a striking, innovative architectural style as this building must set a distinctive quality, character for the estate and there are no significant external cues to the site to reference from

**3.43** Design principle: Building design, materials and tones that help to reinforce sense of light, space and activity will help to counteract the sense of enclosure created by the overhanging trees and the high railway embankments. Its scale and massing should not be overbearing; limiting the height to 4-5 storeys and setting back upper floors from the building line.

**3.44** The three railway embankments surrounding the site on all sides are designated in Merton's Development Plan as green corridors to enable the movement of animals and plants further into urban areas than might otherwise be the case. As well as supporting species habitat and movement, the vegetation surrounding the site helps to create and enhance the character of the site, softening and screening the boundary of the railway lines from within the site.

**3.45** Design principle: Redevelopment of the Rainbow Estate will be expected to make effective use of planting and landscaping to complement the existing green corridor and create a cohesive character for the site.

**3.46** Design principle: Urban design features, such as soft landscaping and lighting columns can be used to create and reinforce parking areas and support the free flow of traffic and establish a sense of separation and defensible space between more public areas and front doors.

#### Employment area and its access

**3.47** For the time being, the Network Rail buildings and enclosed yard set in the north east corner of the site will remain in situ and operational, served by an access road running under the railway arch and along the northern boundary of the site. This influences the layout of the site: new employment buildings should be located close to the existing Network Rail buildings and yard.

**3.48** Design principle: to reinforce character and improve legibility, new employment buildings should be located close to the existing Network Rail buildings and yard.

**3.49** Design principle: the road layouts within the site can improve the legibility of the site: the road divides just inside the entrance, reinforcing a separate character for the more business area and the residential area.

**3.50** The commercial buildings will be a focal point of the site at their central location: two storeys: workshops below connected to office space on upper floors,

**3.51** Design principle: It is important that the commercial buildings are designed to have some form of activity or engagement with the street on their eastern flank, so as not to create a dead, unattractive space for pedestrians between the entrance to the site and the most southerly buildings.

**3.52** Design principle: There is very limited scope to alter the location, layout, scale or height of the business buildings. As these will be at the centre of the site, visible to all other site users, the design of these buildings will be important to establish and continue high quality character throughout the site.

**3.53** The main usable outdoor areas within the site will be:

- the road leading to Network Rail's operational landholdings and the business units. Due to the more commercial nature of the traffic, this road could be of a harder wearing surface than the pedestrian road.
- The pedestrian road leading down the eastern side of the site is likely to take the form of a shared surface at different times of day, although opportunities should be provided

for pedestrians to use pavements. The railway lines descend and the embankments are protected as green corridors for wildlife and are covered in mature trees and shrubs.

**3.54** Design principle: Continuing the landscaping and planting, especially down the residential access road within the site, and bringing it into the site wherever possible will establish character, soften the site, and help enhance the green corridor.

**3.55** Design principle: Buildings must engage with the streets inside the site to create a more active environment and enhance the sense of safety and natural surveillance. Ground floor residential units should all have their own front door opening onto the street.

**3.56** Design principle: Most of the site will have a sense of privacy. It is important that this is designed, lit and managed to reinforce activity and not make it seem dead and passive.

### Residential area, access and spaces

**3.57** An essential factor in creating an attractive, quality character will be the site layout, scale, height and massing of buildings.

**3.58** There are a variety of existing structures which will remain inside the site, which influence the site's current character and should be used as a reference for future quality character. To the northern end of the site, there is a sense of enclosure created by the height of the railway embankments (over 5metres from ground level at its highest) topped with semi-mature trees and other vegetation.

**3.59** Design principle: The varying heights of structures around the Rainbow Estate can provide opportunities for and constraints to creating a sense of identity within the site. Buildings at the southern end of the site should be the highest structures, to give the site a focal point at its end that will help people to navigate around it.

3.60 The topography slopes away to the

#### 3.0 Site context, analysis and resulting design principles

southern end of the site and the railway lines on both sides descend under the Bushey Road bridge, which rises up approximately 15 metres from the site boundary. Unlike the northern section this southerly end of the site is partly visible from West Barnes Lane and residential properties in Carter's Estate, the upper floors of Bushey Court (also residential) and from pedestrians on the north side of Bushey Road bridge

**3.61** Due to the proximity of the railway lines as the site narrows, West Barnes Lane and Bushey Road, the end of the site will be noisier for site users than the northern half.

**3.62** Design principle: The visibility of this end of the site from West Barnes Lane and Carters Estate will require buildings to be designed with attractive, engaging facades.

**3.63** Design principle: Residential buildings should be orientated to maximise sunlight into habitable rooms such as living areas and kitchens.

**3.64** Design principle: The additional noise generated from outside the site may require balconies to be enclosed "winter gardens"

**3.65** Design principle: Planting and landscaping should be used to help reduce noise, air pollution from the nearby roads, especially along the western side of the site. It will help to soften the environment within the site and create a theme running from the nature conservation embankments to the north down through the site.

**3.66** The architecture itself can be creative and unique given the site's characteristsics. The design should reflect, or play-upon the site's industrial heritage. The design of the public realm may also take cues from the existing rail siding and cobbles that remain in the existing access road

**3.67** Good travel patterns must be established from the outset. Measures that will be used to do this include the provision of secure parking for XX cycles in small, secure covered units. The Cambridge Cycle Design guide is a useful reference for best practice. To encourage cycling to be used as much as possible, especially for short trips, it states that residential cycle parking should be: Covered

- Conveniently sited as close as possible to front doors, not obstructing vehicles or pedestrians (e.g. between other pieces of street furniture)
- Easy to get to, without the need to lift or drag the cycle to park it and not located along inconvenient detours or narrow access ways
- In a place with good lighting and natural surveillance to make it feel safe and secure
- Attractive: designed in keeping with their surroundings (including the colour of the stands) yet practical – the simple "Sheffield" type stand is recommended
- Well managed and consistently maintained and cleaned through a funded regime as part of the leasehold. The process to access the cycle storage should be clear to residents and visitors.

**3.68** The provision of dedicated bays for car clubs will also be required to help reduce road congestion, similar to the dedicated bays provided at the Waitrose development on Coombe lane.

### 3.0 Site context, analysis and resulting design principles

Figure 3.6 Building heights



Figure 3.7. Transport heights





# 4.0 Policy context

#### 4.1 The National Planning Policy

Framework (March 2012) sets out national policy applicable to England and Wales. Its aim is to achieve sustainable development, proactively supporting economic growth, boosting significantly the supply of housing, promoting competitive town centres and seeking high quality design.:

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of biodiversity to achieving net gains for nature;6
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

**4.2** The NPPF sets a proactive, progrowth approach to development and requires viability and costs to be recognised and considered in planmaking and decision-taking to enable developments to be deliverable

**4.3** The planning policies for Merton can be found in the statutory development plan for the borough, which consists of

Merton's Unitary Development

Plan 2003 - parts of (some of these policies have been superseded by newer policy or deleted by the Secretary of State)

- Merton's Core Planning Strategy (july 2011)
- The Mayor's London Plan (August 2011)
- The South London Waste Plan (March 2012)

**4.4** If there is any conflict between different policies, the most recently adopted policy applies.

#### 4.5 The Mayor's London Plan (August

2011) sets the planning and development strategy for Greater London and forms part of the statutory development plan for each London borough.

**4.6** The London Plan provides integrated economic, environmental, transport and social considerations across the Greater London Area up to 2031. The Mayor's vision for sustainable development is for London to retain and build upon its status as a leading global city as well as being somewhere people and businesses want to locate. It assesses London's capacity for economic and housing growth and allocates targets for growth to each London borough.

**4.7** The Mayor has revised the London Plan 2011 to ensure is aligns with the National Planning Policy Framework, which was published six months after the London Plan.

**4.8** A complete review of the London Plan has been announced, which may be concluded by 2014.

#### 4.9 Merton's Core Planning

Strategy supports development in Raynes Park that will help maintain the centre's competitiveness without altering its suburban character. To help support local shops, restaurants and cafes during the day, the strategy supports some business function is maintained within and within close proximity to the local centre. Raynes Park centre is surrounded by attractive residential areas and has very good links to central London, Kingston and the south east through the mainline train station at the heart of the centre. A reliance on the commuter trade is not enough to maintain a variety of quality services.

**4.10** Chapter 2 "Background" and Appendix 1 set out the detailed background to the Rainbow Industrial Estate in more detail, including specific references in Merton's Core Planning Strategy

**4.11** The Raynes Park Enhancement Plan's (2008-2011) three objectives are

- To improve access and circulation for pedestrians, cyclists, road traffic and public transport users
- To strengthen Raynes Park's retail offer, making it a more attractive destination for local shopping needs

#### 4.0 Policy context

 To improve the physical environment, appearance and maintenance of the public realm in Raynes Park

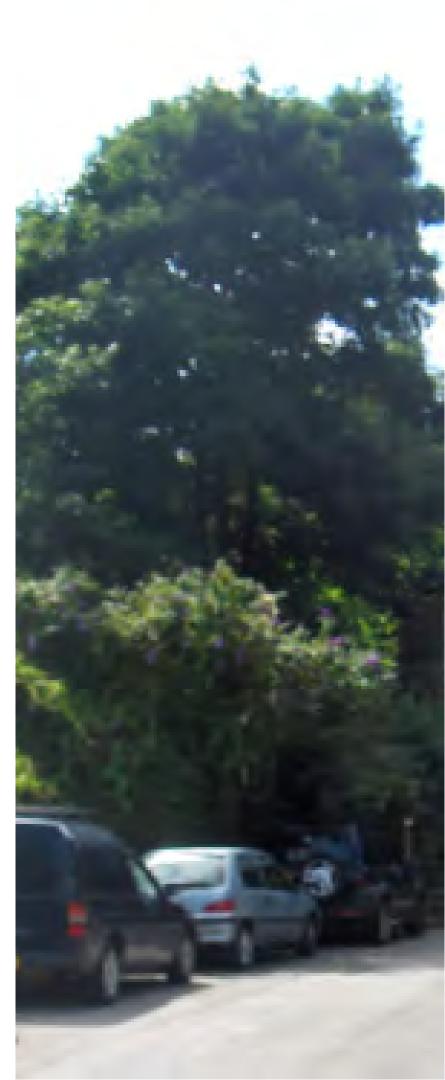
**4.12** Under the "access and circulation" objective, Raynes Park Enhancement Plan's action point 8 states *Determine* feasibility of creating a new dropping off point for the station. Could be provided on the north or the south side of the station – both options to be explored. South option may be deliverable linked with any planning obligation for the Rainbow Industrial Estate"

**4.13** Since the Raynes Park Enhancement Plan was published in 2008, several developments and significant public realm improvements have taken place to the north of the station that restrict the opportunity to create a new drop off point for vehicle passengers. The southern side of the station at the entrance to the Rainbow Industrial Estate is the only deliverable option for creating a new drop-off point which is expected to be delivered by the redevelopment of the Rainbow Estate.

#### **4.14** Merton's Economic Development Strategy (2010 and 2012 update) has the following objectives:

- to improve the average levels of productivity, gross value added and hence pay for jobs in Merton
- to build on Merton's strengths in location, attractiveness, brand value and expertise to promote its economy
- To promote economic resilience in Merton through a diverse local economic base
- To ensure that activity is delivered in a way that supports other values and objectives, notably addressing deprivation in the east of the borough and protecting built heritage and the environment.

**4.15** Research carried out during 2009, supporting Merton's Economic Development Strategy illustrated that Merton had well-occupied employment land with low vacancies but also a lower level of jobs growth between 2000





#### 4.0 Policy context

and 2009 in contrast to the increase in employment found in surrounding boroughs and much of London and the south east. While the council always robustly defends employment land from unnecessary loss to other uses, this approach alone didn't always succeed in capturing all of the economic benefits of more jobs and revitalised adaptable business premises. This policy- focussed approach protected employment land but didn't focus on the delivery of jobs or the provision of flexible employment premises for a changing economy.

**4.16** In order to maximise the potential for fit-for-purpose employment floorspace, potential for jobs and business growth and minimise poorly executed development which adds little to the borough, the council is working with the landowner, a specialists who develop and manage employment, and creative industry premises, representing a long-term investment in the borough. The focus on delivery, job and business creation and support, will complement the council's approach of protecting its employment land.

**4.17** The following table sets out the development plan policies that are relevant to delivering proposals for the Rainbow Industrial Estate. This list is not exhaustive, and applicants should ensure that the most up-to-date development plan documents are referenced at the time of preparing a planning application.

**4.18** Merton's Design Review Panel comprises a group of independent professionals working in the field of the built environment. The Panel advises the council on design issues in relation to important new development schemes and proposals for important public spaces, including both major planning applications and pre-application development proposals. Proposals for Rainbow should be presented to the Design Review Panel at an early stage.

Employment Design.	London Plan (2011)         Policy 4.1 Developing         London's economy;         Policy 4.12: Improving         Opportunities for All.         Policy 7.1:         Building London's and         Communities, Policy         7.2: An Inclusive         Environment, Policy         7.2: An Inclusive         Environment, Policy         7.3: Designing Out         Crime, Policy 7.4:         Communities, Policy         7.2: An Inclusive         Environment, Policy         7.3: Designing Out         Crime, Policy 7.4:         Local Character, Policy         7.1: Location and         Design of Tall and         Large buildings, Policy         7.8: Heritage Assets         and Archaeology,		Development Plan Policies (this list is not exhaustive)         Merton's Local Plan       Key Scheme Key Requirements         Merton's Local Plan       Key Scheme Key Requirements         Core Strategy: Policy       Employment, skills developments proposals should support local employment, skills development and training opportunity to apply for employment during the construction of developments and in the resultant Policies DPD and draft Policies Map: Ext. Local employment during the construction of developments and in the resultant end use.         Core Strategy: CSR:       Employment during the construction of developments and in the resultant end use.         Core Strategy: CSR:       Design and Assess Statement: Following engagement with relevant with relevant undices for composition of development, and demostrate how best inclusive design, inclusion Town         Core Strategy: CSR:       Design and Assess Statement: Following engagement with relevant with relevant service design, inclusion will be maintained and managed.         UDP: BEB, BE15, BE16, BE17, BE19, BE20, BE21, BE23, BE24, BE31, BE33, BE34, BE35, PE4.       Designing Out Crime: this should reduce the opportunities for criminal BE25, BE28, BE29, BE33, BE34, Be14, BE16, BE17, BE19, BE13, BE33, BE34, BE35, PE4.
	Policy 7.13: Safety, Security and Resilience to Emergency,	Draft Sites and Policies DPD and draft Policies Map: DM. D1: Urban design and the public realm; DM D2: Design considerations in all new development,	

Plan Policies (this list is not exhaustive)	Key Scheme Key Requirements	<b>Design Review Panel:</b> Due to the scale and size of this proposal, it is advisable for it to go through Merton's Design Review Panel. The Panel comprises a group of independent professionals working in the field of the built environment. The Panel advises the council on design issues in relation to important new development schemes and proposals for important public spaces, including both major planning applications and pre-application			Health Impact Assessment (HIA): The impacts of major development proposals on the health and wellbeing should be considered through the use of a HIA. Also new developments should be designed, constructed and	managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.
Development Plan F	<b>Merton's Local Plan</b>		Merton's Economic Development Strategy 2010 & 2012 update.		Core Strategy: CS11:Infrastructure	Draft Sites and Policies DPD and draft Policies Map: C1: Community facilities
	London Plan (2011)	Policy 7.14: Improving Air Quality, Policy 7.15: Reducing and Enhancing Soundscapes.	London Plan table 3.2: Density and table 3.3: Housing standards	Interim London Housing Design Guide(2010) and Housing SPG (2012)	Policy 3.2: Improving Health and Addressing Health Inequalities	
		Design			Community Facilities	

Plan Policies (this list is not exhaustive)	Key Scheme Key Requirements	<b>Housing Density:</b> As guidance use Table 3.2: Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare). However as detailed in the justification text, this table should not be used mechanistically – local context, design, transport capacity and social infrastructure should also be taken into consideration. <b>Housing Mix:</b> Merton's Strategic Housing Market Assessment (SHMA) [2010] identified that there is a need for more homes of all types and sizes throughout Merton.	Affordable Housing Requirements: 40% affordable housing	Tenure Mix: 60% social and affordable rent and 40% intermediate housing.	Housing Design Standards: All housing should be built to the minimum requirements as detailed in Table 3.3 Minimum space standards for new development.	Play and Information Recreation requirements: Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Please also refer to the Mayor's SPG Providing for Children and Young People's Play and Informal Recreation for quidance.	Lifetime Homes and Wheelchair Standards: All residential development is required to be built to 'The Lifetime Homes' Standards and 10% of new housing should be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
Development Plan P	<b>Merton's Local Plan</b>	Core Strategy: Policy CS4: Raynes Park Sub-Area, Policy CS8: Housing Choice, Policy CS14: Design. UDP: HS1.	DPD and draft Policies Map: DMH2: Housing Mix, DMH1: Supported Care Housing for	or secure residential institutions for people housed as part of the	Strategies: Merton's	Draft Housing Strategy (2012 – 2015).	
	London Plan (2011)	Policy 3.3 Increasing Housing Supply, Policy 3.4, Optimising Housing Potential, Policy 3.5: Quality and Developments, Policy 3.6: Children and Young People's Play and Informal Recreation Facilities,		3.12: Negotiating Affordable Housing on Individual Private Residential and Mixed	Use Schemes London Plan table 3.2: Density and table 3.3:	Housing standards Interim London Housing Design Guide(2010) and Housing SPG (2012)	
		Housing					

Development Plan Policies (this list is not exhaustive)	Key Scheme Key Requirements	<b>Sustainable Urban Drainage Systems (SUDS):</b> Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.	<b>Critical Drainage Area:</b> proposals may need to incorporate suitable mitigation measures to address the issues associated with Critical	Drainage Areas	Adequate Water Supply: development proposals must include adequate wastewater infrastructure capacity.	<b>Conservation of Water Supply:</b> development should minimise the use of mains water by: incorporating water saving measures and equipment and designing residential development so that mains water consumption meet a target of 105 litres or less per head per day.	
Development Plan Po	<b>Merton's Local Plan</b>		UDP: PES, PEO, PE7.	Draft Sites and Policies DPD and draft Policies Map: DM F1:Support for flood risk management;	Core Strategy: CS11: Infrastructure	Draft Sites and Policies DPD and draft Policies Map:	DM F2: Sustainable drainage systems (SuDS) and wastewater and water infrastructure
	London Plan (2011)	Technical Guidance to the National Planning Policy Framework (March 2012), Policy 5.12: Flood Risk Management and Policy 5.13: Sustainable Drainage		Policy 5.14: Water Quality and Wastewater	Intrastructure and Policy 5.15: Water Use and Supplies		
	Topic	Flooding			Water		

lan Policies (this list is not exhaustive)	Key Scheme Key Requirements	<b>Energy Assessments:</b> major developments should include detailed Energy Assessments to demonstrate how the targets for carbon dioxide emissions reduction as detailed in this policy will be met. <b>Code for Sustainable Homes (CfSH)</b> : we would expect both affordable housing and private housing to meet Code Level 4 of the CfSH	<b>Building Research Establishment Assessment Method (BREEAM)</b> <b>Standards:</b> all non-domestic development over 500m2 are expected to be built to a minimum of BREEAM Very Good standard and meet CO2 reduction targets in line with the London Plan or national policy, whichever is the greater.	Multi Utility Services Company (MUSCO): all major development is strongly encouraged to be MUSCO ready where viable and actively contribute to the networks where possible.	Sustainable Design Standards: major development should meet the minimum sustainable design standards as set out in the Mayor's SPG and this should be clearly stated within a design and access statement.	<b>Overheating and Cooling:</b> major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the London Plan cooling hierarchy. Also, major development should demonstrate how the design, materials, construction and operation of development would minimise overheating and also meet its cooling need. Please see the London Climate Change Adaption Strategy for more information on this,	<b>Green Infrastructure:</b> should be taken into consideration at the beginning of the design process to contribute to urban greening, including the public realm.	<b>Green Roofs and Development Site Environments:</b> major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.
Development Plan Poli	<b>Merton's Local Plan</b>	Core Strategy: CS15: Climate Change UDP: PE12						
	London Plan (2011)							
	Topic	Climate Change						

Development Plan Policies (this list is not exhaustive)	Key Scheme Key Requirements	<b>Combined and Cooling Heat and Power:</b> where possible, opportunities should be taken to provide combined heat and power and combined cooling heat and power.	Waste Storage and Recycling: we require integrated, well-designed waste storage facilities that will include recycling faculties for all new developments where appropriate.	<b>Construction Waste Removal:</b> should be removed from the construction site, and materials brought to the site, by water or rail transport where that is practicable.	<b>Parking Standards:</b> LB Merton's parking standards for new schemes are in line with those detailed in 6.2: Car Parking Standards of the London Plan (2011). Developments should provide secure, integrated and accessible cycle parking facilities in line with Table 6.3: Cycle Parking Standards.	<b>Walking:</b> development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space	Scoping Report: this will be required to agree what key items need to be addressed in the transport assessment to be submitted with the planning application.	<b>Transport Assessment:</b> a transport assessment would be required. Please refer to TfL guidelines to find the type of information required for a Transport Assessment.	<b>Consult TfL:</b> due to the size and scale of this proposal, and as this site is located on the strategic road network (which the proposals would be dependent for main access to the site), the applicant should consult proposals with TfL.
	Merton's Local Plan	Core Strategy: Policy CS17: Waste Management.	UDP: PE11		Core Strategy: Policy CS18: Active Transport, Policy CS19: Public Transport and Policy CS20: Parking, Servicing and Delivery. UDP: PE1.			Draft Sites and Policies DPD and draft Policies Map: DM T1: Support for sustainable transport and active travel, DM T2: Consideration of transport impacts of development,	
	London Plan (2011)	Policy 5.17: Waste Capacity, Policy 5.18: Construction,	Excavation and Demolition Waste		Policy 6.3, Assessing Effects of Development on Transport Capacity, Policy 6.9: Cycling, Policy 6.10: Walking, 6.13: Parking , Policy 6.12: Road Network Capacity				
	Topic	Waste			Transport				

Development Plan Policies (this list is not exhaustive)	Key Scheme Key Requirements	Air Quality Assessment: this is required for applications which would have a significant adverse effect on air quality.	<b>S106 required:</b> This is detailed in Merton S106 SPD (2006). Please include these in your development appraisals as S106 will be required to make the planning application acceptable in planning terms.	Mayor's community infrastructure levy required: the Mayor's CIL is levied at £35 per square metre for most additional floorspace built in Merton.	<b>Merton's CIL:</b> the council proposes to submit Merton's CIL charging schedule to the Secretery of State for public examination in autumn 2013. The proposed changes for Meron are for any new residential dwelling or over 100 square metres new floorspace:	Colleirs Wood, Raynes Park and Wimbledon: £220 per square metre	Mitcham and Morden: £115 per square metre.	If Merton's CIL passes the independent examination, it woud be implemented in Merton from April 2014.
	<b>Merton's Local Plan</b>	DM T3: Applying relevant car parking and servicing standards, DM T5: Consideration of connections and access to the road network;	Core Strategy: CS11: Infrastructure	UDP: C1, C8, C13, BE27, PE2, PE3, L8.	SPG: Planning Obligations SPG			
	London Plan (2011)							
	Topic	Transport	Plan ning Obligations					



# **5.0 Objectives**

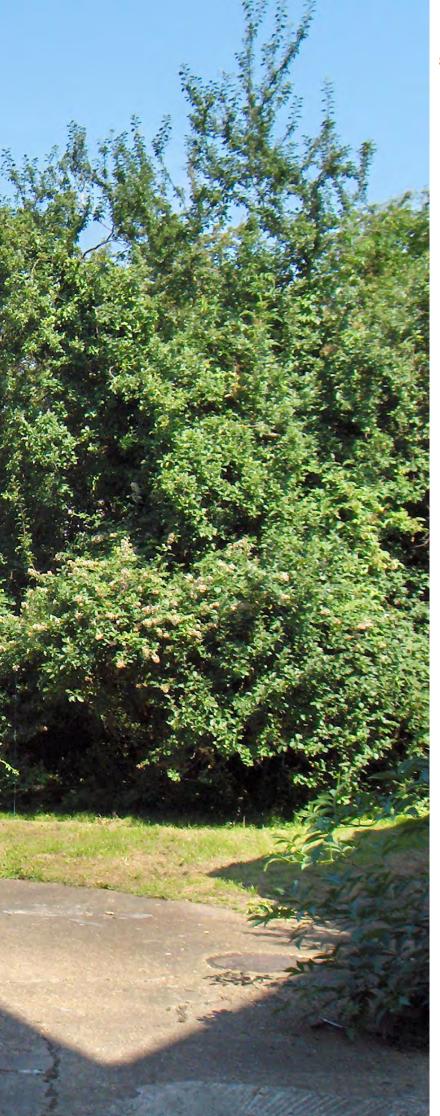
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## 5.0 Objectives

**5.1** The objective for this site is to maintain viable and active employment floorspace compatible with the site circumstances of the Rainbow estate, supporting business and job opportunities and creating footfall to help support other shops and services in Raynes Park local centre during the working week.

**5.2** Merton's Core Planning Strategy Policy CS.4 Raynes Park Local Centre objective is

**5.3** To improve the quality of the environment and accessibility within Raynes Park local centre and encourage development that reflects local physical and social character.

**5.4** We will do this by:

(a) supporting development in Raynes Park local centre that provides for the needs of the local community, including business uses;
(b) Resisting the loss of employment

(c) Requiring development within and around the centre to respect local character and amenity, addressing flooding issues where appropriate
(d) Improving the local environment and street scene, complementing initiatives started via the Raynes Park Local Centre Enhancement Plan
(e) Securing environmental improvements for pedestrians and cyclists and improving public transport facilities.







**6.1** In accordance with Merton's Core Planning Strategy, policy CS12, it is proposed that the site be redeveloped to deliver employment-led regeneration.

6.2 As a minimum, the site is required to retain the same quantum of employment floorspace providing at least 3,400 square metres (c 36,500 square feet) or more of employment floorspace (workshop, studio and ancillary office) of a layout, format, design and standard that is usable by and attractive to SMEs and flexible enough to recognise the changing needs of small businesses over time (policy CS12).

**6.3** The employment floorspace should be located and laid out near the existing Network Rail buildings, laid out to help separate the rest of the site from employment activities

6.4 Redevelopment of the site is required to provide a publicly accessible drop-off point for vehicles and their passengers at the entrance to the site, allowing set down and pick up from Raynes Park station (known as a "Kiss and Ride") (policy CS4: Raynes Park; Raynes Park Enhancement Plan)

**6.5** The council will seek a consistent, cohesive approach of materials and tone for the paved areas (road and pavement) and landscaping between the entrance to Raynes Park station and the bridge entering the site, creating a well-managed, attractive and safe public realm that does not distinguish between different land ownerships and interests.

6.6 A maximum of 250 new residential units built to design standards set out in the London Plan and associated documents (Mayor's London Housing Design Guide, Mayor's Housing SPG 2012). 80% of the apartments should be one and two bed in recognition of their accessible location.

6.7 Residential buildings should be located predominantly to the southern end of the site with one residential building designed and positioned as a focal point at the entrance. All residential properties should be designed to the standards of the Mayor's London Housing Design Guide, Mayor's Housing SPG 2012: dual aspect, maximized solar gain, while minimizing overlooking. **6.8** To create a sense of place and identity out of this almost invisible site, the whole development should create a high quality urban environment by using the site layout, form, scale and massing of buildings, landscaping, planting and other urban design considerations

**6.9** Landscaping within the site should enhance and complement the Sites for Importance for Nature Conservation and green corridors found along the railway embankments.

**6.10** All car parking will be provided on site to the standards set out in the London Plan 2011. Parking should be provided at less than one space per dwelling for 1-2 bedroom residential properties with a maximum of 1.5 spaces for 3 bedroom properties. 20% of the car parking spaces should be unallocated to allow for flexibility and visitor parking. At least one parking space per property should be allocated to properties with three bedrooms or more.

6.11 To help establish good travel patterns from the outset, the development will be expected to provide secure parking for cycles in accordance with standards in the London Plan. These should be provided in small, secure covered units. The Cambridge Cycle Parking Guide for New Residential Developments guide is a useful reference for best practice.

**6.12** The council requires alldevelopments to demonstrate how they make effective use of resource and materials, minimising water use and C02 emissions.

**6.13** The Council requires all dwellings to be built to at least Code for Sustainable Homes level 4), for which accreditation will be required, providing a low level of carbon dioxide emissions and proposals should investigate the feasibility of incorporating a combined heat and power system.

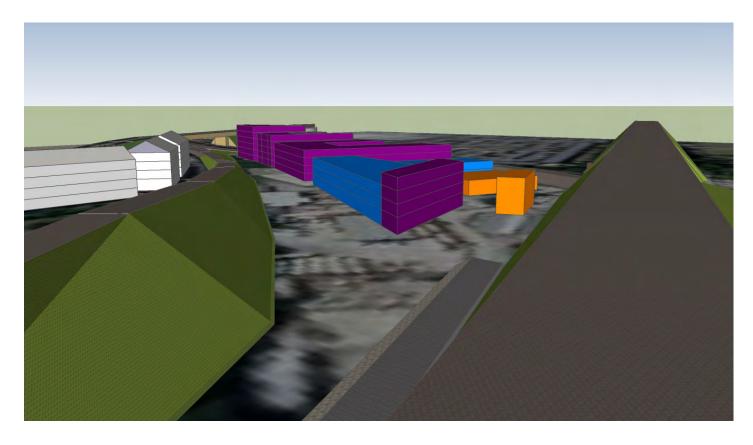
6.14The council encourages the highest level of investment in building fabric that is achievable, to improve insulation (reducing energy bills and increasing the comfort of future occupiers) and help reduce noise.

6.15 The council will encourage residential buildings to be orientated to maximise passive solar gain.



Figure 6.1 Massing concept - view from above Carters Estate

Figure 6.2 Massing concept - view from station platforms (south side)



### Figure 6.3 Massing concepts - entering the site

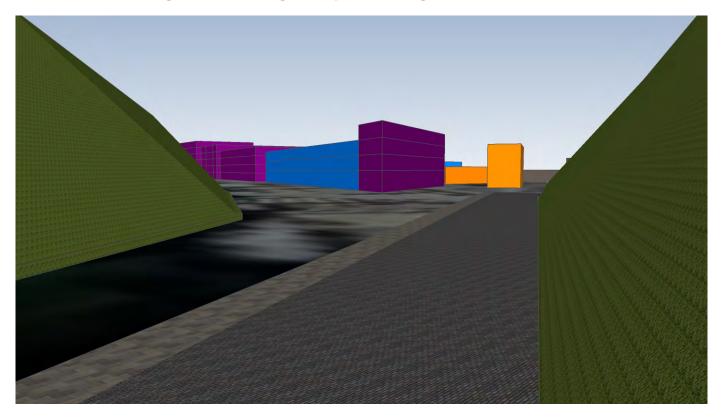
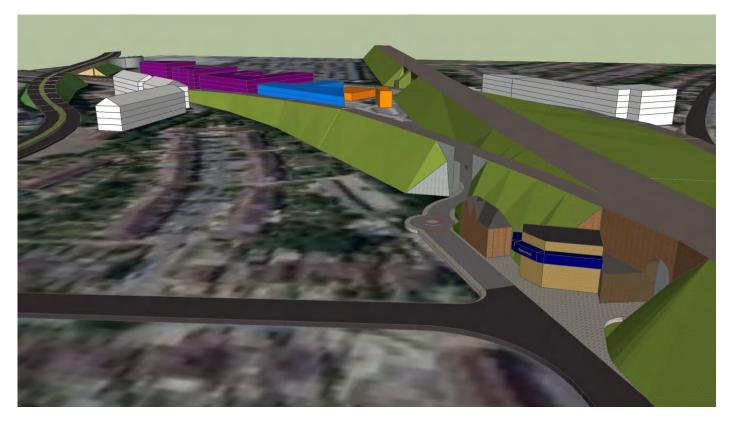


Figure 6.4 Massing concepts - view from above Apostles



**6.16** The council will encourage new development to incorporate renewable energy infrastructure eg. roof-mounted solar panels.

**6.17** The council requires lighting to be installed and maintained to enhance the public realm, feeling of safety and security while minimising light pollution and adverse impacts on the fauna and flora of the adjoining green corridors.

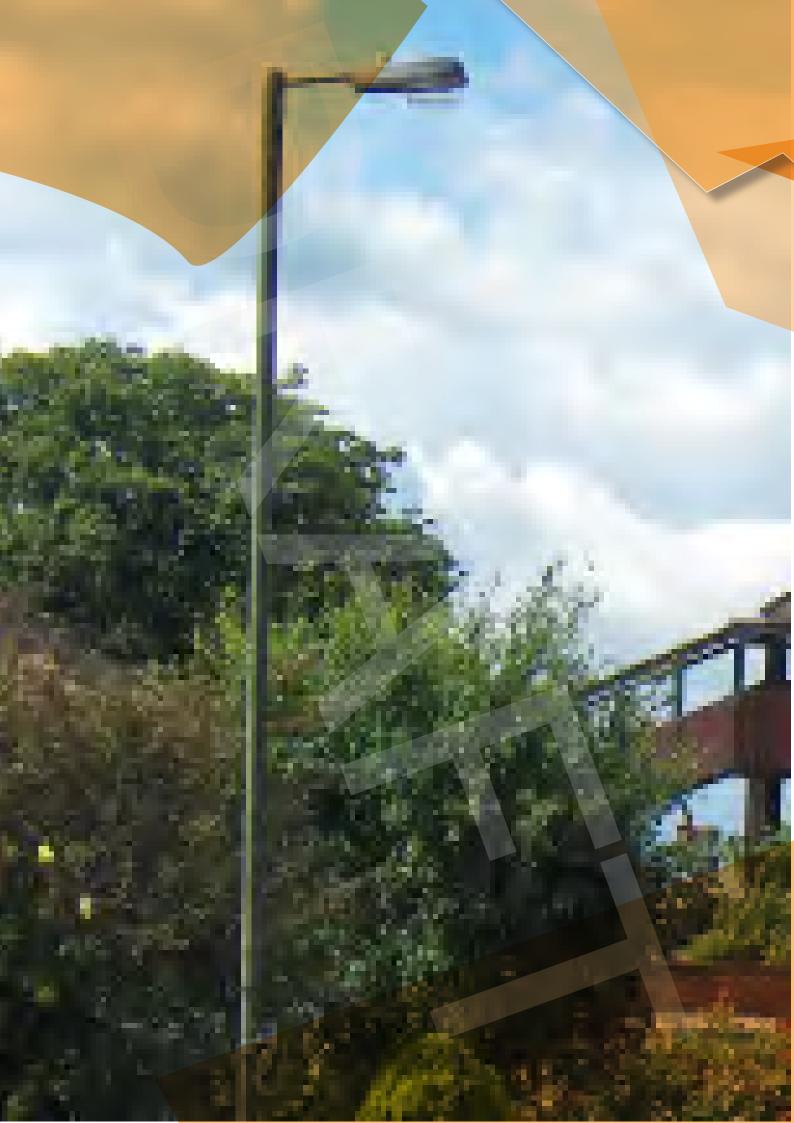
**6.18** The Council will encourage building material to be recycled as far as possible and any timber used in new development should be derived from renewable sources.

**6.19** The Council will require that convenient access for service vehicles collecting recycled material be achieved.

**6.20** The Council will encourage the development to be constructed as far as possible with sustainable drainage systems that facilitate the absorption of water into the ground.

**6.21**The council will require the implementation of sustainable drainage systems and any other measures necessary to mitigate flooding from all sources.





# 7.0 Planning application

## 7.0 Planning application

**7.1** A planning application will include a number of explanatory assessments including a design and access statement, transport assessment, biodiversity assessment and flood risk assessment setting out how the proposals will meet the Council's sustainability objectives, an assessment of public and private transport impacts and how they will address urban design, flood risk and biodiversity issues.

**7.2** Other matters that are particularly relevant to the proposal for Rainbow, and will be delivered via planning conditions or obligations are:

- A parking management plan to robustly demonstrate how parking will be managed and enforced on site, including setting out the number of allocated spaces, shared spaces.
- A travel plan, monitored over five years, to establish good travel patterns from the outset.
- The kiss and ride will be expected to be delivered as part of the development.
- Planning obligations will be sought as permitted by legislation to mitigate any adverse inpacts.

**7.3** Advice on planning applications can be found via Merton Council's website www.merton.gov.uk. Applicants are advised to consider a pre-application meeting with the council to ensure that the most up-to date information is being used to inform planning proposals.

## 8.0 Links to key policy documents and research

Please use the following links to access the key documents and research you need to inform future proposals for this site.

### **National Policy**

• The National Planning Policy Framework (2012):

<u>http://www.communities.gov.uk/</u> publications/ planningandbuilding/nppf

 Technical Guidance to the National Planning Policy Framework (2012):

http://www.communities.gov.uk/documents/ planningandbuilding/pdf/2115548.pdf

### Merton's Development Plan

The London Plan (2011): <u>http://www.</u> london.gov.uk/priorities/planning/ londonplan

• Merton's Core Planning Strategy (2011):

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/2011-07-28 core\_strategy\_adopted.pdf

• Unitary Development Plan (2003):

http://www.merton.gov.uk/environment/ planning/planningpolicy/merton\_unitary\_ development\_plan.pdf\_

• Sites and Policies Plan (draft 2013): http://www.merton.gov.uk/environment/ planning/planningpolicy/

### Merton's other Documents:

• Community Infrastructure Levy:

http://www.merton.gov.uk/environment/ planning/cil.htm

• Merton's Section 106 SPD (2006):

http://www.merton.gov.uk/environment/ planning/s106-agreements.htm\_

#### Merton's Research:

• Affordable Housing Viability Assessment (2009):

http://www.merton.gov.uk/environment/ planningpolicy/ldf/lb merton - viability study final report 2010.pdf

• Authoriy's Monitoring Report:

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/annual monitoring\_report.htm\_

• Code for Sustainable Homes Level 4 Viability Evidence Base:

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/2010-05-01\_ viability of code for sustainable homes. pdf

• Economic and Employment Land Study

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/merton els - final report - sept2010 1255485-1 .pdf

• Strategic Housing Market Assessment (2011):

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/merton\_shma\_ march\_2010.pdf

 All other planning policy research that may be of use (including the Strategic Flood Risk Assessment):

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/ planningreserach.htm

- Sustainable Design and Construction Evidence Base 2010:
- Part 1-3:

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/md5.38 chapters 1-3.pdf

- Part 4-end:

http://www.merton.gov.uk/environment/ planning/planningpolicy/ldf/md5.38 chapters\_4-end.pdf