

Wandsworth Society

Prepared 28th December 2018

Please reply to:
49 Wandsworth Common West Side
London SW18 2EE

Mr T Cronin,
Head of Planning
Dept of Environment and Community Services
Wandsworth Council
Town Hall
Wandsworth High Street
London SW18 2PU

For the attention of M/s Esterina Bartilomo

Dear Sir.

**Jaggard Way Redevelopment London SW18 8SG
Outline Planning Application No: 2018/5413
Objection**

We have considered the above application, read the statements of the applicants, the insubstantial set of drawings and viewed the various objections, some of which are detailed and articulate in planning terms, such as Mr Nabil Hindi's contribution.

We are at a loss to understand why the application is for outline consent when much detail is provided. This can only be to mislead the planning authority in an endeavour to secure an advantageous position as and when a detailed application is submitted. As a result we strongly object to this application on the following grounds.

- 1 The emphasis of this outline application is for a substantial residential development riding on the back of and to the detriment of a successful redevelopment of a group of existing industrial premises on a very confined site.
- 2 The site is a most successful working group of local businesses, which has been fully occupied since it was built some 30 years ago. It is one of the last remaining such sites in the area. It meets an urgent need in the borough where so many similar light industrial sites have already been lost through redevelopment. It is classed as an 'Employment Protected Area' (EPA) within the Council's "Employment and Industry" (E&I) planning policies document adopted in November 2018.
- 3 The proposed scheme is overdeveloped with too great a massing and the mix of uses would be incompatible with each other contrary to Policy EI5.3.
- 4 The applicants are seeking to largely restrict the use of their site to "commercial" – their nomenclature – elements, B1a and D2, rather than "industrial" uses such B1b/c, B2 and B8, which are quite appropriate for this previous railway yard and current 'industrially' designated site.

- 5 The residential buildings at the southern end of the site are too close to the railway, in particular the segregated block of 'affordable housing'. The council has exceeded all housing targets and this site is one of the last of its kind generating industrial employment in the area and does not need to be sacrificed for this scheme.
- 6 As with the previous application refused in January 2018 we concur with the council's Design Review Panel at that time, that an Outline Application is inappropriate for the site, where design, materials and landscaping are held in reserve, despite all the detailed elements already provided, thus determining scale, dimensions, and other detail. The application should enable both the Council and the general public to determine site usage, but importantly also, its visual impact upon the local residential neighbourhood, the local Conservation Area and Wandsworth Common – valuable, strategic, Metropolitan Open Space.

To develop the above statements:

1) Confined site.

The site is very confined, shown with a narrow vehicular/pedestrian access neck at the northern end. The scheme proposed has brought forward the line of building towards the railway, to the extent that parking is limited to 19 spaces, only 12 of which are allocated by the applicant for commercial vehicles with one on the main frontage, which doubles as a disabled bay, and thus could be so occupied. Two of the remaining spaces are in a confined space between Blocks 3 and 4 and would be unsuitable for any small or medium size lorry, to say nothing of articulated trucks. When the B1c units are occupied, they would each require close access from parked delivery vehicles whilst loading/unloading. All commercial vehicles are wider and longer than private cars and have turning circles in excess of cars and vans; we cannot see how this factor has been taken into account in the ground floor plan of the site. Additionally, the service road to Blocks 3 and 4 is too narrow for the kerbside parking of lorries to service these units. Thus we consider the scale of access, servicing and parking provision to be inappropriate for this commercial/industrial development site on this ground alone and does not serve the prime industrial use for this site.

2) Employment Protected Area.

i) The designation of the site requires that it is the replacement of industrial units which should have design primacy in any redevelopment. This application site is **not** designated as an "Employment Use intensification Area" (EUIA) in the Council's (E&I) document of November 2018, which considers such areas as "appropriate" for residential use. Jaggard Way is solely designated an (EPA) in the new policy. In such areas, residential mixed use is not presupposed but will be permitted only if - "the development would result in no net loss of the existing office and industrial floor space and if the mix of uses can be successfully achieved on site in accordance with policy E15". There is no loss of existing floor space but its future use is sought by the applicant to be generally downgraded to B1a rather than B2 or B8 as currently existing and permitted. This is clearly due to the close proximity of the proposed residential elements rather than to meet appropriate needs of future occupiers of the industrial units.

ii) Policy EI3 stipulates that premises that – "are in industrial use should continue to provide B1c, B2, B8 or industrial *sui generis*", unless it can be proved there is no demand; the applicant has not made such a case.

The application, in seeking 'mixed use', does **not** ensure that the layout and design of the development 'complements' the uses proposed and – 'that the amenity of residents and the operational requirements of businesses are designed in, and that any conflicts are mitigated to a high standard' - in accordance with policy EI5.3, where a series of issues have to be addressed these include:

- "location of potentially conflicting uses and sensitive receptors, particularly windows, doors and amenity spaces;
- positioning of servicing (such as bin stores, loading bays, vehicle and cycle parking);
- noise, vibration, dust, light and other pollutants;
- security;
- overlooking, privacy and visual disturbance;
- access arrangements, including pedestrian, cycle and vehicle routes. Separate street front access for different uses should be designed-in".

We do not consider that the Outline set of drawings explaining this application fulfill these criteria. For example, we have already pointed out the failure of servicing arrangements. However, by only applying for Outline Consent we believe that the applicants are deliberately avoiding these issues by inferring that the eventual scheme design could be different, possibly improved. We cannot see how the conflicts clearly discernible on the ground floor plan especially, can be resolved to ensure that there will be segregation between users, adequate means of maintaining the site in an orderly fashion as industrial sites by their very nature can be untidy places which generate traffic and waste. On this tight site, the clash of users with their contradictory expectations and needs – residential and industrial – will happen and in our view cannot be planned out in the current or any other scheme for this site in which the two uses conflict. It is too confined.

3) Over development.

i) The proportions of the long, narrow site do not comfortably accommodate the scale of the development proposed by the applicant.

In point 1 above), we remarked on the limited space available for servicing the industrial units, due primarily to the large scale of the residential elements. Similarly, they impact at the rear, east boundary of the site where the substantial and continuous new blocks are shown drawn in plan close to the boundary, some third in length being just c2metres distant. This close proximity to the boundary line is intrusive and unneighbourly. It is also unnecessary and a direct result of the overdevelopment proposed for the site for the residential units. Clearly, it is the substantial residential element which has dictated the form, scale and size of the whole redevelopment proposal rather than to give primacy to factors which should be generated by providing first class industrial units.

ii) There are no site sections through submitted to indicate heights of the proposed development and the context of the site in relation to the railway station and the existing residential neighbourhood. But we surmise from the limited information available that the proposed industrial premises are of a minimum internal height of c3metres and do not meet the Mayor of London's preferred criteria for such units. We strongly suggest that this is due to keeping the mass of the blocks as low as possible to both retain a maximum number of storeys of residential units above,

whilst suppressing the overall height of the redevelopment to try to avoid controversy.

(We would draw to your attention the difference between the design approach to this industrial site with another current application at Ferrier Street (2018/5669) where primacy is given by the developer to providing excellent industrial units of size and scale which meet the Mayor of London's preferred allowances, including internal heights of between 4.5 and 8metre heights giving scope for mezzanines if required by occupants and large machinery. Also, the site is designated as an 'Economic Use Intensification Area' (EUIA) not an (EPA) and enjoys adequate, generous vehicle servicing provision)

4) Residential design.

i) The design of the residential buildings has to be addressed although we do not consider the site suitable for the proposed mixed use as we have explained. Block 4 in particular is a feature of overdevelopment where the building is proposed to be within 2.1 and 6.4 metres of the railway boundary. At this distance are proposed 6No. 2 bed/4 person and 3No. 1bed/2person homes whose use would be restricted to mechanically ventilated and "winter garden' protected balconies facing the busy railway only metres away.

ii) There are proposed, predominantly, numerous small flats in all four blocks, with little or no access to open space around their homes and with balconies which, facing west, would have to face the railway and its constant, repetitive noise 24 hours a day coupled with, from below, the daily noise, bustle and movement associated with a lively industrial development at ground level.

As we have pointed out in point 1 above, the pedestrian approach to the residential units would be across the immediate frontages of the busy and often open wide doorways of the industrial units which would in health and safety terms alone be incompatible. Policy EI3 specifically states that – "separate street front access for different uses should be designed-in". The proposal does not satisfy this policy criteria, nor can it be so 'designed-in' to the current plans. This is a significant fault of the proposed development.

5) Visual impact.

i) As an outline Application, the applicant is hedging its bets and probably saving on consultant's costs at this stage. This is an insensitive way for an applicant to try and win over opposition and convince the Council of the sincerity of the approach of the tabled design proposals, bearing in mind the very strong opposition to the earlier application last year and the site's setting surrounded by a Conservation Area and the Common. Whereas the first, north block, has been reduced in height from the earlier, refused application the overall scale of the current development does not warrant approval on grounds of its continuous massing and height and its close proximity to its neighbours and the railway.

ii) Should a properly designed, full scaled, modern industrial development be proposed for the site without the impediment of introducing incompatible residential mixed use, meeting appropriate industrial standards of scale, mass and heights would not produce buildings of the scale and massing currently proposed. We would suggest that this is why the site was not designated an (EUIA) as residential mixed use is just not appropriate, and the current application has mistakenly attempted to show otherwise, without success.

6) Conclusion.

We conclude by strongly opposing the current Outline Application for the future development of this site on the above argued grounds, in which we have carefully considered the proposals but find them deficient and not conforming with Council policies which are only 6 weeks old, and thus need to be followed rigorously.

We trust that your recommendations to the planning applications committee will reflect these views.

Yours faithfully,

Philip Whyte

Convener of the Planning Sub-committee of the Wandsworth Society

[L]
SEP:

[L]
SEP: