

Wandsworth Society

Please respond to:

49 Wandsworth Common West Side

London SW18 2EE

20th March 2025

Planning and Development Control

Wandsworth Borough Council

The Town Hall

Wandsworth High Street

London SW18 2PU

For the attention of Matthew Hollins

Dear Sirs.

Planning Application 2024/4486
118-120 Garratt Lane, London SW18 4DJ

Objection.

We note that this application is being reconsulted and observations are due by 10th April 2025. This follows the applicant having introduced a riverside walk by the River Wandle on the east boundary of the application site, since first registration on 11th February.

We have noted the comments already raised by:

- i) The Environment Agency, which requires the planning authority to assess a series of detailed points regarding flood risk, access to the Wandle and to the existing weir to the NE corner of the site boundary. *We presume that the points raised will be suitably assessed.*
- ii) Various letters of objection by local residents, from Twilley Street in particular, behind whose north facing back gardens runs the sole access road which bridges the Wandle to the application site. Their principle concerns being:
 - a) the disturbance that additional heavy goods, and other vehicles, requiring 24 hours access to and from the site along the access road will bring.
 - b) increased traffic entering from, and egress to, the busy Garratt Lane with associated safety concerns.
 - c) The scale of the proposed building.*We support these concerns and make further observations below.*

- iii) Letter of objection from the chair of the Wandle Valley Forum, dated “March ‘25”, *whose observations we support*. In particular, drawing the attention of the council in points 2 and 3 of the letter, of its strategic and local policies in respect of the Wandle and its environs, including the absence of a riverside walkway. However, since this letter was produced the applicants have revised their application to show a 2 metre wide, riverside public footpath with a planted verge of indeterminate width, and what could be a safety fence although this is not clear. *We object* to this revision as being undersized and comment below.

Our observations, in addition to addressing the above points, are as follows:

Riverside Walk:

A width of 2 metres for the proposed, shared, cycle/pedestrian, riverside path is too narrow. This does not accord with Policy LP 52 of the adopted Local Plan. A minimum 3 metre wide strip of land is required to allow a safe walk/cycle path with a planted margin along the sheer bankside/ river wall. Perhaps a simple railing, with room for an occasional, narrow, bench seat might be possible. This is the minimum cycle infrastructure guidance advised by two authoritative bodies, namely:

- a) The Local Transport Note 1/20, chapter 5, advises a 3 metre wide shared path, but as 2 metres is a standard already set along the Trewint Street to Plough Lane stretch to the south, set within a very broad strip of land along its length and not cramped as with the application site, we consider that this would seem acceptable, but not without a 1 metre wide buffer by the riverbank.
We therefore seek a minimum 3 metre wide strip of land by the Wandle for both safety and user comfort on which to build a 2 metre shared path. This would appear to meet the Council's preferred margin by riverbanks for public paths.
- b) TfL's London Cycling Design Standards, a key document, discusses in chapter 4, detailed guidance for various shared cycle/pedestrian paths. However, we would refer again to our point made in a) above, that the standard set by the existing, satisfactory, riverside walkway can be considered acceptable at 2 metres within a 3 metre zone between the application site boundary fence and the sheer river bank.
- c) We would also stress that the issue of having a new path along the Wandle is clearly spelt out in the Council's planning policies as highlighted by the Wandle Valley Forum letter, paragraphs 2 and 3. The applicants would have been well aware that the site would need to provide an adequate, safe and attractive path by the river and should have been accommodated in its design and valuation/evaluation of the site's potential from the outset.

Development Design:

Scale and height of building: the existing buildings stand at 7.5 metres height. The proposed building is shown as 16.5 metres, more than double in height. As a result we consider the massing of the proposed building to be unnecessarily excessive. To explain;

- a) the east facing roof eaves is the high point of the building but is pitched some 4.5 metres higher than the first floor office above which is a void. The main roof pitch above the first floor of the warehouse, as shown on drawing No.31093-PL-204 A,

section AA, if lowered to c14 metres and the office roof pitched down from the revised ridge to an eaves level of 11.5 metres -

- b) the impact of the building to the eastern street of housing (Twilley Street) would be reduced significantly by some 2.5 metres, a domestic storey height.
- c) The suggested changes do not affect the useable space within the proposed development, but would appease one of the principle concerns of local objectors.
- d) Therefore we object to the current, proposed height of the development which can be lower without affecting the warehouse floor plans.

24 hour use: the application is for “24 hour access Urban Distribution Centre” which strongly implies that the warehouse tenants could/would require 24 hour access. The use of spaces for 6 articulated lorries serving the four warehouse units which together could produce a high turnover of sizeable heavy goods vehicles, plus vans and cars, throughout a 24 hour period, 7 days a week.

We object to this element of the proposals because:

- a) the narrow access road is so close to housing that it is unreasonable for it to carry heavy goods vehicles, in particular through the night, which could cause the residential properties close by disturbance and the loss of quiet enjoyment of their accommodation.
- b) Consequently, that should approval be given to the redevelopment of the application site as presented, that a condition prohibiting vehicle use should be imposed restricting access between, say, 10pm and 7am.
- c) Otherwise, *we object* to the current proposed use of the site for the continuous ‘distribution’ of goods, 24/7.

Cycle shed and site facilities: whilst we applaud the introduction of the shed, it is hidden in an obscure part of the site; out of sight, out of mind, perhaps?

- a) We consider the shed should be better sited to encourage use. We also query its capacity?
- b) Similarly, we question the very small number of 15 basic parking spaces for staff and visitors to the warehouse units where the anticipated staffing numbers could rise to 76, or even 128 we understand from the applicant’s Planning Statement.
- c) We have experience of similar industrial sites in Wandsworth; Jaggards Way comes to mind by Wandsworth Common station, where during the working day, traffic movement is constant, much of the site becomes used for rubbish, unloading of goods, the parking and turning of many vans, cars and small lorries.
- d) The rather cramped application site has a restrictive layout to cope with such normal, working demands. We query whether, with the planned use of articulated vehicles, there is adequate circulation space to meet these demands?

Conclusion

We consider, that unless the points raised above in the site’s ‘Development Design’ are addressed, properly assessed and revised, that the planning application is strongly recommended for refusal to your Council’s planning committee.

Your faithfully,

Philip Whyte

Leader planning Group

Wandsworth Society

NB: attached below is sketch of suggested revisions to the roof profile of the warehouse units.



