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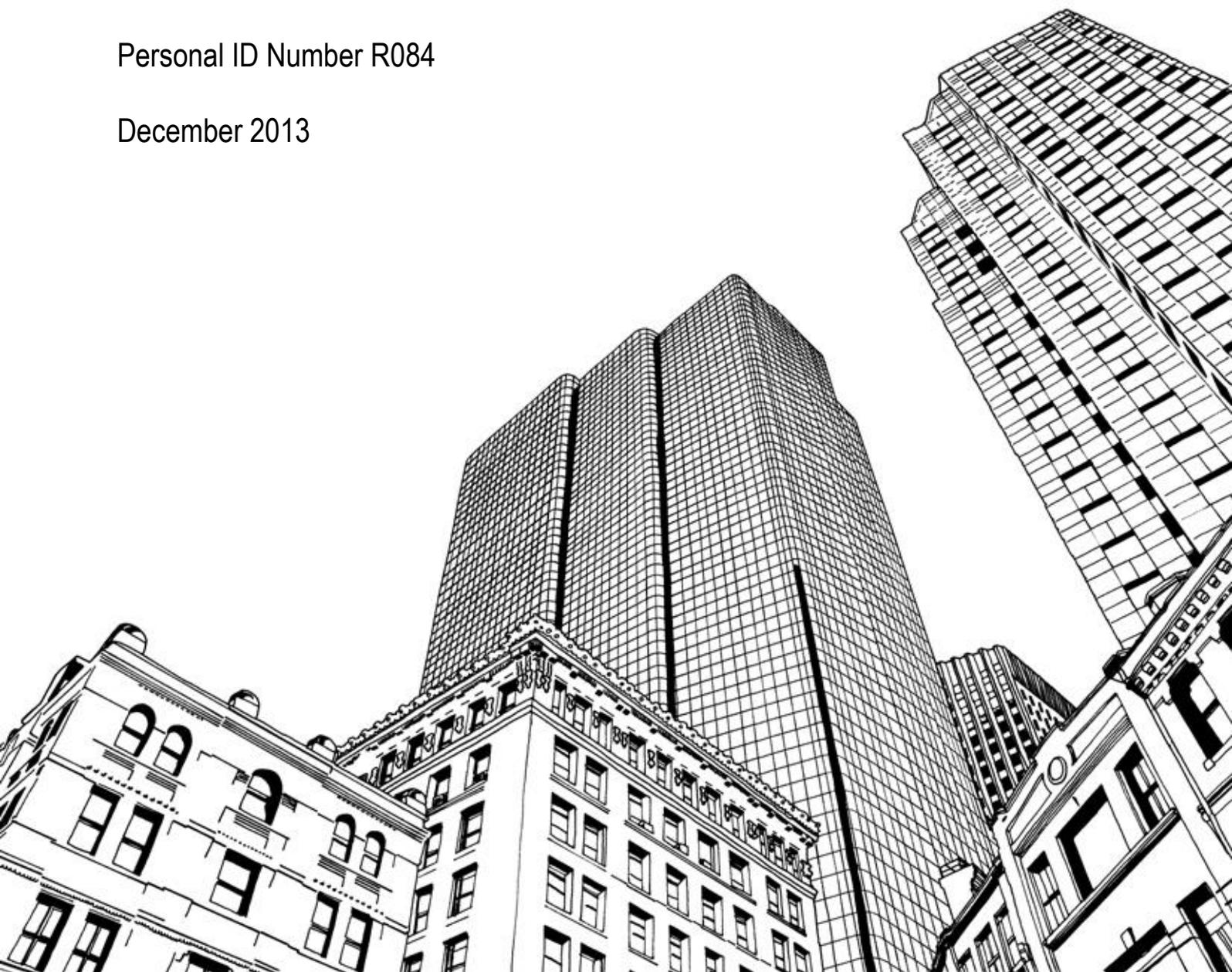
# Examination in **Public** Merton Sites and Policies Plan

Hearing Statement submitted on behalf of Astranta Asset Management

Site 70 Haslemere Industrial Estate  
Week 2 Day 5 - Questions (a) and (b)

Personal ID Number R084

December 2013



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# 1 Question (a): Is this site a suitable location for business/light industrial or other suitable employment led development?

## Representation

- 1.1 Jones Lang LaSalle has been instructed by Astranta Asset Management (whom represents the landowners of the Industrial Estate) to submit further representations in regard to the submission Merton Sites and Policies Plan, which is currently being considered at the Examination in Public, in order to answer the questions set by the Inspector.
- 1.2 The previously submitted representations to the Sites and Policies Plan, seek a flexible and enabling approach to the redevelopment of Haslemere Industrial Estate for alternative uses, in particular residential.
- 1.3 This approach is required because the industrial buildings, which date from the 1920's have reached the end of their useful life and are not fit for purpose, furthermore, it has been found that is it not commercially viable to redevelop the site for industrial uses, as such, to enable the site's redevelopment, alternative employment or other uses should be considered. A letter explaining the current situation from Astranta Asset Management on behalf of all of the landowners is attached **at Appendix 1** and these issues are also set out in detail, in the earlier representation made to the Sites and Policies Plan.
- 1.4 It should be noted that the landowners of Haslemere Industrial Estate fully support the Council's approach to the site under Site 70 in the Sites and Policies Plan and the Estate should continue to be allocated for an employment led redevelopment, however, it is suggested that the allocation be widened to confirm that residential development would be acceptable in the Council's emerging policy document, given the site's location within a residential area and unsuitability for some types of employment use.

## The Site Specific Issues - Why the Site is Unsuitable for Industrial Use

- 1.5 This section sets out the reasons why the site is not suitable for industrial development in addition to the representations already made to the Sites and Policies Plan.

## Access to the Industrial Estate

- 1.6 Haslemere Industrial Estate is located within a residential area located some 500 metres east of Garratt Lane which provides a number of shops, services, bars and restaurants.
- 1.7 Access to the site is from Haslemere Avenue, which is predominately residential in character and, as such, accommodates on street residential parking along both sides of the carriageway. This reduces the road width along the majority of its length and means that larger vehicles associated with the Haslemere Industrial Estate have to frequently give way to opposing traffic.

- 1.8 Haslemere Avenue is traffic calmed along its length and a width restriction is also in place to the west of the Industrial Estate limiting vehicles wider than 7ft from passage. Any vehicle of a greater width is directed out of Haslemere Avenue, with the intention that it heads away from the residential areas and towards the A217 Garratt Lane whereupon it can disperse into the wider area on the strategic road network. Consequently, access is already restricted for larger vehicles.
- 1.9 It is understood that some local residents in the area have identified to Ward Councillors that the use of the site as an industrial estate means that some the lorries and larger vehicles associated with it, use the surrounding residential streets (in particular Ravensbury Terrace).
- 1.10 In response to this issue, to avoid this route being used by large vehicles, the London Borough of Wandsworth consulted with business and residents in proximity to the site (including those falling within the adjacent London Borough of Merton) to understand if local people would support a width restriction being placed on the Road.
- 1.11 On 23 April 2012 a proposal to introduce a width restriction on Ravensbury Terrace was subsequently debated at Committee, as it is considered that the industrial traffic has an unacceptable impact on the surrounding residential dwellings
- 1.12 The Commette Report prepared by Officers for the Strategic Planning and Transportation Overview and Scrutiny Committee **at Appendix 2** sets out the consulation process and the conclusions drawn from it by Officers. In addition to this, the main findings are summarised below.

#### **The Impact of Industrial Estate on the Surrounding Residential Area**

- 1.13 In seeking to impose the width restriction on Ravensbury Terrace the LB Wandsworth sent a questionnaire to local residents who live around the Industrial Estate (totalling 1,421 properties). Only 18% of those who responded supported the proposed width restriction. It was noted that the majority of the supporting respondents live on Penwith Road, Duntshill Road, Strathville Road and Ravensbury Road.
- 1.14 This clearly shows (along with the fact that residents have also approached the LB Wandsworth directly to highlight the negative issue of larger vehicles using the residential streets) that residents of the immediately surrounding area are adversely affected by the use of the site as an Industrial Estate.
- 1.15 It is understood by the analysis of the repsonses to the LB Wandsworth consultation that those residents who did not vote in favour of the width restriction were concerned that the larger vehicles visiting the Estate would use their roads (rather that Penwith, Dunsthill, Strathville and Ravensbury Road), so did not support the proposal.
- 1.16 The consultation showed that all residential respondents in Ravensbury Terrace were in favour of the proposal to impose a width restriction mainly due to issues of night time disturbance, safety and accidental damage to their vehicles due to the narrow residential access to the Industrial Estate.
- 1.17 Despite these concerns, the proposals were not recommended for implementation as the majority of respondents did not support the proposed restriction. However, when considering the findings of this process in more detail, it was evident that residents in other adjacent streets objected to the proposal because of concerns that large vehicles would be displaced onto their streets, if the width restriction was put in place.

- 1.18 It should also be noted that the report acknowledges that the businesses that use the estate have listened to the concerns of local residents and put in place every measure available to them to reduce early or late deliveries and prevent lorries for using the surrounding residential streets. However, due to the nature of the businesses on the site some disturbance is simply unavoidable.

#### **The Impact of a Width Restriction on the Industrial Estate**

- 1.19 It should be noted that if local residents continue to raise concerns with living next to Haslemere Industrial Estate and a width restriction is put in place in the future then there is no possibility that any of the larger vehicles that normally visit any of the buildings getting there (there are no alternative routes) and the businesses will not be able to operate and will have to close.
- 1.20 For example, the Anglo-Austrian Patisserie Ltd operates from units 1b to 3 on the Estate. They produce cakes for the major supermarkets and wholesale distributors and as such require access to the production unit for raw materials and distribution of finished goods via pallet loads.
- 1.21 In any one given day they may receive raw materials by the pallet load which can be as much as 30 pallets in a day and also receive bulk flour, sugar and food oils delivered into the silo systems via tanker vehicles. Finished goods leave the factory by pallet distribution and will be a minimum of 12 pallets on any given day, up to about 80 pallets on peak demand days.
- 1.22 Clearly to move this volume of raw material and finished goods to and from the site, appropriate sized vehicles have to be used to make the business both economically viable supplying in a very difficult sector, but also from an environmental impact point of view, with as low a carbon cost per unit transported as possible. Therefore, it is unavoidable that some larger vehicles need to access the site, and clear if this is prevented the businesses will close.
- 1.23 It should be noted that the same issues do not face the Rufus Business Centre, located adjacent to Haslemere Industrial Estate, as it supports smaller business units (rather than larger industrial buildings). Therefore the modern nature of this development and the high office content means that it is much more compatible with the network.

#### **Why the site should be released for alternative uses**

- 1.24 In respect of the site's impact on the adjoining residential properties, it's redevelopment for other uses (such as leisure, offices or residential) would reduce its impact on the adjoining area and would improve the amenity of the surrounding dwellings.
- 1.25 It should be noted that the Council's own evidence base also highlights this issue with the Council's Employment & Economic Land Study dated September 2010 stating at paragraph 4.28 that small scattered industrial sites in residential areas often provide poor quality accommodation for occupiers, and can be very difficult to re-let if they become vacant.

#### **Conformity with the Wider Policy Context - The National Planning Policy Framework (NPPF) March 2012**

- 1.26 The NPPF sets out the government's planning policy to be used as guidance to inform the preparation of development plans and how applications for new development should be considered, some of the most relevant points in relation to Site 70 Haslemere Industrial Estate are set out below:

- Planning policies in Local Plans should follow the approach of the presumption in favour of sustainable development (para 15).
- Local plans should support existing business sectors and allow a rapid response to changes in economic circumstances (para 21).
- Local authorities should identify and maintain a rolling supply of specific deliverable sites, sufficient to provide five years' worth of housing (para 41).
- Local authorities should plan for a mix of housing (para 159).
- Policies should work closely with the business community to understand their changing needs including viability (para 160).

1.27 Jones Lang LaSalle considers that the Sites and Policies Plan is sound and is in line with the National Planning Policy Framework. Identifying Haslemere Industrial Estate as Site 70 and the Council's approach to the site satisfies the requirements within the NPPF and it responds to each of the identified points above, which are specifically relevant to Haslemere Industrial Estate, in line with the representations submitted in respect of the site.

### **Conclusion**

1.28 In answer to question (a), it is clear that from the evidence identified above, the site is not a suitable location for industrial use or indeed intensive business use, and should be redeveloped for alternative employment purposes more akin to the residential setting or other alternative compatible uses (such as residential).

1.29 Therefore, to help ensure the allocation under Site 70 is flexible enough to allow the site to accommodate further housing if required, a suggested change to the wording of the policy is set out below.

### **Suggested Change**

1.30 It is suggested whilst the current policy is broadly supported that consideration be given for the following wording for Haslemere Industrial Estate:

- Business / Light Industrial (B1) or a suitable employment **and/or residential led** mixed use development.

## 2 Question (b): It has been suggested that the site should be allocated for a mix of employment and residential uses. What would be the advantages and disadvantages of this approach?

### Representation

- 2.1 This section sets out the advantages of the site being allocated for a mix of employment and residential redevelopment.
- 2.2 As previously highlighted, the redevelopment of the site for industrial uses is simply not commercially viable. This coupled with the fact that local residents are adversely affected by the larger vehicles associated with the use of the site as an Industrial Estate means that alternative employment uses and other uses (such as residential) should be considered for its redevelopment.

### The Advantages of an Allocation for Employment and/or Residential Use

#### Improving the Amenity of Surrounding Residential Properties

- 2.3 As set out in the previous section, the site is located within a residential area, as such local residents have complained of the associated negative impacts of noise and disturbance, safety concerns, and potential damage to parked cars due to the lorries which visit the Industrial Estate.
- 2.4 The advantages of the redevelopment of the site for alternative employment and residential uses would be that this impact would be completely removed.

#### The Availability of the Site

- 2.5 The landowners of the site recognise the issues affecting residents living next to the Industrial Estate and face their own issues having to try to operate from buildings which have reached the end of their useful life.
- 2.6 As previously set out in the representations made to the Sites and Policies Plan, advice received by the landowners from local agents indicate that this is not a suitable location for an industrial redevelopment and as such the landowners are committed to working together to find a solution to this issue. A letter explaining the current situation from Astranta on behalf of all of the landowners is **attached at Appendix 1**.
- 2.7 The site therefore could come forward for redevelopment in the short to medium term as required by the current draft policy framework and the landowners of the site are committed to working together to achieve this.

#### The Deliverability of the Site

- 2.8 As stated above, the landowners of Haslemere Industrial Estate are now working together to bring the site forward for redevelopment. In order to understand if the residential redevelopment of the site is possible, the landowners have therefore jointly instructed MAA (an architectural firm); to assess the site and understand if a mixed use employment / residential scheme can be accommodated on it.

- 2.9 The initial analysis undertaken by MAA is **attached at Appendix 3**. This shows that the site easily lends itself to a mixed use scheme with employment/commercial at ground floor level and residential accommodation above. It should be noted that this initial proposal has been reviewed by Motion (Transport Consultants) and Buro Happold (Flood Risk Consultants) to ensure that the necessary road widths/refuse collection/car and cycle parking and flood risk mitigation solutions can be incorporated within the proposed scheme.
- 2.10 Motion Transport has also undertaken a wider initial transport appraisal of the site and concluded that it has a reasonable level access to transport services (falling under PTAL 3) with Earlsfield Station only 600 metres away and is also well located for local shops and services.
- 2.11 In terms of the residential led redevelopment of the site, the analysis concludes that the trips generated by such a redevelopment would be in line with the current vehicle usage and of course not generate trips by large vehicles. Overall the report concludes that in transport terms the site is better suited to accommodate residential development and is not well suited for industrial use. **The report is attached at Appendix 4.**
- 2.12 In addition to this, Buro Happold has reviewed the initial proposal by MAA and the Environment Agency's representations to the allocation of Haslemere Industrial Estate to understand the points raised.
- 2.13 The initial analysis highlights that flood risk issues affect many highly urbanised London Boroughs and sets out that there are two main principles which have to be considered when assessing sites for residential development.
- 2.14 The first is the ability of occupants to safely leave their homes in the event of an extreme flood event. The analysis undertaken by Buro Happold indicates that if the site is redeveloped in line with the MAA scheme that dry egress is possible through the north-west corner of the site.
- 2.15 The second is that the development should not increase the flood risk to areas elsewhere. The initial report concludes that the initial proposal drawn up by MAA architects will allow the introduction of sustainable drainage techniques and that the accommodation of undercroft parking means that the development could actually increase the volume of flood water that can be stored on the site, when compared to the existing building arrangement. **The report is attached at Appendix 5.**

### **Conclusion**

- 2.16 In answer to question (b), it is clear in light of the analysis undertaken in respect of the site in this and the previous section, that there are many advantages to employment and residential development (such as reduced traffic impact on existing residents and the possible increase in the storage of flood water). Furthermore, it is also clear that the site is available and deliverable for employment and/or residential use.

# Appendix 1 – Letter from Astranta Asset Management

FAO Inspector Robert Yuille MSc DipTP MRTPI  
c/o Pauline Butcher  
PROGRAMME OFFICER  
London Borough of Merton  
London Road  
Morden  
SM4 5DX

11 December 2013

Dear Mr Yuille,

**RE: MERTON SITES AND POLICIES PLAN  
PUBLIC EXAMINATION  
SITE 70 - HASLEMERE INDUSTRIAL ESTATE - EARLSFIELD**

I am writing to you in respect of Haslemere Industrial Estate in Earlsfield. My company is called Astranta Asset Management Limited. Astranta are appointed by the landowners of the site to bring forward proposals and to organise a future redevelopment.

We represent Oak Green Estates Limited, of whom I am a director, the Edler family, Anglo-Austrian Patisserie Ltd, which occupies the majority of the site, and Columbus Industrial Property Fund who own the remaining land.

The site includes four units that are dated (circa 1920s), which are reaching the end of their useful economic life and I have provided a brief overview of the current situation the reasons why, from our perspective, the site should be redeveloped as well as explaining why it is deliverable in line with the current emerging policy framework.

**Background**

The landowners are currently struggling to operate from or let (on a long term basis) the existing industrial units due to their age/configuration and poor location within a predominately residential area.

In order to fully understand the issues faced by the estate we jointly two years ago commissioned JLL to produce a Property Report to understand if, the site could be redeveloped for industrial use and/or what other options there were.

The report highlighted that it is not viable to redevelop the site for industrial use as the cost needed to do so could not be justified in terms of the value of the buildings which would be created i.e. the value of leasing the units or continuing the use them as owner-occupiers.

On this basis, the landowners submitted written representations to the Merton Sites and Policies Plan and spoke to and met with Officers at the Council to highlight the possibility that the site could be redeveloped for a mixed use / residential scheme.

As you are aware, the London Borough of Merton agreed with the issues facing the Estate and subsequently put forward the allocation for the employment led redevelopment of it although we would prefer to see a principally residential scheme.

#### **The Availability and Deliverability of the Site**

Given the emerging policy context and to ensure that the site could be delivered in line with the draft policy framework, the landowners have subsequently instructed MAA (Architects), Motion (Transport Consultant) and Buro Happold (Engineers /Flood Consultants) to undertake initial analysis of the site to understand if, in practical terms, it can support a mixed use residential led redevelopment.

These initial findings are appended to the further representation submitted to the EiP and therefore I will not summarise them within this letter, but overall they demonstrate that the site can be redeveloped for a mixed use employment / commercial and residential scheme.

This, in addition to the fact that all of the landowners of this small industrial estate are facing the same problem and have agreed to work together to bring the site forward for redevelopment (preferably for a residential led scheme), shows that the site is available and deliverable, in line with the allocation (Site 70) within the Merton Sites and Policies Plan.

On this basis, we respectfully ask the Inspector to find the Council's approach of identifying the site for redevelopment sound and suggest that the wording should be amended to include a reference to the ability of the site to support residential use as part of its redevelopment, as set out in the further representations to the EiP submitted by Jones Lang LaSalle on behalf of the landowners.

## Conclusion

The site is currently reaching the end of its economic life and its redevelopment for industrial use can simply not be justified in financial terms, nor is it in a location or capable of offering the unit size or access, which is required by industrial occupiers.

In terms of the potential for continued industrial use on the site, it is understood that there is currently little demand for this type of industrial floorspace in the Borough and that once the existing tenants vacate, it is likely that the buildings will lie vacant.

Given that it is not viable to redevelop the site for industrial scheme, in order to ensure that the best use of previously developed land is made and the site does not lie vacant in perpetuity; its redevelopment for other uses should be supported in the Council's Submission Sites and Policies Plan, and amended to include a reference to residential use being appropriate in this location.

On this basis, your support in ensuring the site for can be brought forward redevelopment for alternative employment and other complimentary uses (such as residential) would be greatly appreciated.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'N. Colvin'.

Nick Colvin BSc Hons FRICS  
Director

# Appendix 2 – LB Wandsworth Committee Report Dated 23 April 2013

WANDSWORTH BOROUGH COUNCIL

STRATEGIC PLANNING AND TRANSPORTATION OVERVIEW AND  
SCRUTINY COMMITTEE – 23RD APRIL 2013

EXECUTIVE – 29TH APRIL 2013

Report by the Director of Environment and Community Services on the  
outcome of a public consultation on proposals to introduce a width restriction  
on Ravensbury Terrace, SW18 (Southfields).

SUMMARY

This report summarises the outcome of a consultation on a proposal to introduce a width restriction on Ravensbury Terrace (Southfields) at the Borough boundary. The consultation was undertaken over a wide area including residents and businesses in the London Borough of Merton.

The consultation leaflet outlining the proposals was delivered to all properties in the consultation area with a return date of 10th December 2012. There was an overall response rate of 18% with the majority of respondents not supporting the proposal. Respondents expressed concern regarding the possible displacement of large vehicles onto adjacent residential roads and the associated negative effect on road safety. Some respondents were also concerned about the effect on businesses in the Haslemere Industrial Estate and the potential loss of highway parking space. The business respondents expressed their concern regarding the proposals and in particular the potential effect this would have on their operations. The majority of residential properties on Ravensbury Terrace supported the proposal, highlighting that noisy deliveries to some of the business units were undertaken overnight during anti-social hours and that there was a pattern of damage to parked vehicles on the road due to the size of the delivery vehicles. The activity of large vehicles using residential roads resulted in road safety concerns being expressed by residents.

Taking into account the outcome of the consultation process and the consideration of associated issues it is recommended not to proceed with making an order to introduce a width restriction. Following the consultation process, further discussion between the businesses and the Council has resulted in an undertaking from the businesses regarding their transport operations that aims to mitigate, as much as this is possible, the detrimental effect being experienced by local residents. It is proposed to pursue and monitor these undertakings and liaise with representatives from the businesses and residents to establish if other highway measures can be considered for implementation that may assist with the requirements of both

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parties.

The Director of Finance comments that the proposed monitoring of business owners' efforts to minimise the effects of deliveries in Ravensbury Terrace, and discussion with businesses and residents to establish further highway measures for implementation described in this report will be contained within current 2013/14 Traffic Management revenue budgets.

### GLOSSARY

ETO	Experimental Traffic Order
HGV	Heavy Goods Vehicle
HIE	Haslemere Industrial Estate
LBM	London Borough of Merton
LBW	London Borough of Wandsworth
RTA	Road Traffic Accident
TfL	Transport for London

## **RECOMMENDATIONS**

1. The Strategic Planning and Transportation Overview and Scrutiny Committee are recommended to support the recommendations to the Executive in paragraph 3.
2. If the Overview and Scrutiny Committee approve any views, comments or recommendations on the report, these will be submitted to the Executive and/or appropriate regulatory or other committees for their consideration.
3. The Executive is recommended to:-
  - (a) note the outcome of the consultation undertaken for the proposed introduction of a width restriction on Ravensbury Terrace;
  - (b) agree that the width restriction is not implemented;
  - (c) instruct the Director of Environment and Community Services to:
    - (i) further liaise with the businesses in the Haslemere Industrial Estate to achieve a transport operation that minimises the negatively impact on residents and their property in the local area;

## ***Ravensbury Terrace – Proposed width Restriction***

- (ii) in conjunction with lead residents in the area and the businesses establish the potential for any highway measures to be considered to further aid achievement of the objective in (c) (i); and
- (iii) liaise with the appropriate authorities regarding devolving powers to permit local authorities to deal with the issues of unsuitable large vehicles using residential roads.

### **BACKGROUND**

4. Ravensbury Terrace is a Borough road with a width of 7.5 metres: since parked cars are permitted to park partially on the footway this leaves a running lane of 4.7m. There are 10 residential properties on the east side of the road; 7 of these are Victorian terraced houses facing onto the road and there are a further 3 properties in a new development to the rear of the terraced houses. To the west side of the road are the flank walls of corner homes on Ravensbury Road in the London Borough of Wandsworth (LBW) and Haslemere Road in the London Borough of Merton (LBM). The Borough boundary with Merton is located as shown on the plan in Appendix A. There is an industrial estate in Merton just beyond the Borough boundary, namely the Haslemere Industrial Estate (HIE), containing a range of business units and operations. Vehicular access for large heavy goods vehicles (HGVs) to this estate is via Ravensbury Terrace. In Mount Road in the LBM there is an existing width restriction in place signed at 7 feet (2.135m). Ravensbury Road and Ravensbury Terrace form part of the signed Borough cycle route network.
5. This report summarises the outcome of a consultation on the proposal to limit large commercial vehicle use of Ravensbury Terrace accessing the HIE in response to local concerns made to Ward Councillors and the Member of Parliament for the area; Paper No.12-626 considered by this Committee in September 2012 refers. The Executive agreed to undertake consultation on the proposals. The consultation proposal was to introduce a width restriction on Ravensbury Terrace at the Borough boundary. The width restriction would be signed at 2.2m, 7 feet 6 inches. The consultation was undertaken over a wide area including residents in the LBM.

### **CONSULTATION PROCESS AND RESPONSE**

6. A consultation letter and questionnaire was delivered to local residents during the period 17th to 20th November 2012 in the consultation area shown in Appendix A. The consultation area encompasses a wide area including adjacent properties in the LBM, as it was accepted that LBM residents would be affected by the proposals. Also on Ravensbury Terrace is a builders yard and a long single-storey red-bricked business unit, The Warehouse that contains nine business units. There are two access routes to The Warehouse; one on Ravensbury Terrace

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and another main pedestrian door, which fronts onto the private access road into HIE. The consultation results included these business addresses as Ravensbury Terrace responses as per their declared address, as distinct from those businesses within the HIE.

7. The letter and questionnaire document was delivered to all properties in the consultation area, which totalled 1421. A return date of 10th December 2012 was specified, although questionnaires received up to 17th December 2012 were also included in the consultation analysis. Postage was prepaid.
8. There were 259 responses to the consultation from the entire area, representing a response rate of 18%. Of those that responded, 94 (36%) supported the introduction of a width restriction, while 139 (54%) were not in favour. The majority of respondents on Penwith Road, Duntshill Road, Strathville Road and Ravensbury Road supported the proposals. These roads have also made previous representations to the Council regarding oversized commercial vehicles using their roads to access the HIE. A summary of the outcome of the consultation based on responses from each borough is provided below in Table 1 and Appendix B provides a full road by road summary.

Borough Response	Support Proposal	Not in Support of Proposal	Undecided
Wandsworth	83	48	21
Merton	11	91	5
TOTAL	94	139	26

9. The demand for proposals to limit the size of commercial vehicles delivering to HIE was from residents of Ravensbury Terrace. Frontages along this short corridor would be directly affected by the proposed width restriction including loss of highway parking space. Considering the response from Ravensbury Terrace only, there were 20 consultations delivered; 10 to residents and 10 to businesses, although one of the resident responses subsequently declared themselves as also a business occupier in the HIE. 12 responses were received; 5 from residents, 6 from businesses and 1 from the dual resident/business occupier. This is a 60% representation, which is a good response rate. Of the 5 resident responses, all were in favour of the proposals. The 7 business responses were not in favour of the proposals. Overall the consultation outcome shows that 7 respondents from Ravensbury Terrace did not support the width restriction, while 5 respondents did.

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10. The largest percentage response received was from those residents in Haslemere Avenue in the LBM i.e. 73% (27 from 37 delivered) of which 85% of the respondents did not support the proposal. Within the HIE 32 consultation documents were delivered and 9 were returned, of which 8 did not support the proposals. A number of the businesses that responded provided additional information indicating their opposition to the proposals and the affect this would have on their business operations. The businesses advised that the proposals would prevent them from trading effectively and this could lead to closure. Several business responses pointed out that this would have an adverse affect on the local Earlsfield economy and jobs.
11. Responses were received from stakeholders including the Police, Merton Council, Wandsworth Council Waste Services and Wandsworth Community Transport. The Emergency Services, although acknowledging receipt of the consultation letter, did not supply a formal response. The Police and Community Transport had no objection to the proposal. The Council's waste management team commented that a minimum clear width of 3.5 metres is required to provide an unhindered service and therefore it was considered that the width restriction could cause waste collection issues. The LBM response was received from the three Ward Councillors for the Wimbledon Park Ward. They expressed concern regarding the impact that this proposal will have on the roads and residents within Merton's boundary, primarily Acuba Road and Haslemere Avenue, and the impact that this will have on them and the dangers for school children attending neighbouring schools.

### **CONSULTATION DISCUSSION**

12. Comments received in response to the consultation were of a common theme, expressing concern that the width restriction would simply displace delivery vehicles of a certain width wishing to access the HIE to use other residential roads, which were considered by the respondents to be less suitable. Many respondents were concerned that road safety would also be compromised by transferring large vehicles on to Acuba Road and/or Ravensbury Road as they are school routes used by a high volume of child pedestrians. Some consultees, including residents, were concerned with the ramifications the proposals would have on businesses in the HIE and on local jobs. Others considered the loss of local parking spaces in LBW unacceptable, especially as parking is restricted to permit holders only in the adjacent LBM parking zone. Ravensbury Terrace residents commented that the proposals would resolve overnight noise nuisance issues arising from loading to the HIE, improve road safety for pedestrians and also reduce the regular damage by accidents by large delivery vehicles.
13. The location of the proposed restriction is on the Borough boundary and therefore it is unlikely that the Council's refuse trucks would have a

## ***Ravensbury Terrace – Proposed width Restriction***

requirement to pass through the restriction or this section of Ravensbury Terrace to service the area. However, it would require the vehicles to reverse into/out of Ravensbury Terrace.

14. Following the consultation process, Councillors and officers from LBW and LBM met to discuss the proposal in an attempt to arrive at a mutual acceptable solution. Various options were discussed however a solution to the satisfaction of all parties could not be established. The LBW local Councillor perspective as presented was that to do nothing about the large lorries is unacceptable for the following reasons; the exceptionally large lorries using the road are posing a serious threat to safety, particularly to children both living on the street and using it for access to nearby Wimbledon Park school. It was claimed that a recent near miss involved a young baby in a buggy. It was stated that these lorries cause serious noise at night, disturbing residents and also cause damage to cars, street furniture and highway infrastructure. From the LBM Councillor point of view, whilst appreciative of the issues being faced by Ravensbury Terrace residents, it was deemed unacceptable to consider transferring vehicular traffic wishing to access the HIE to use Haslemere Avenue and Acuba Road in LBM. This they claim would simply result in increased road safety issues for residents and children that use this route to access local schools.
15. The results of the consultation showed that all of the residential respondents from Ravensbury Terrace were in favour of the proposal. Some businesses are registered as located on the Terrace and did not support the proposal. In the surrounding area, the majority of respondents from Penwith Road and Ravensbury Road both supported the proposals. However the vast majority of respondents from Haslemere Avenue, potentially the alternative route for deliveries to the HIE, did not support the proposal.
16. Following the consultation process and at the request of the businesses in the HIE a meeting was held in March 2013 between Business representatives from the HIE, the Cabinet Member for Strategic Planning and Transportation, Councillor King and local Ward Member, Councillor Caddy and officers from LBW. At this meeting the Council's position regarding this proposal was presented and in response the businesses and their representatives stated their concerns should this proposal be implemented. The meeting provided the opportunity for the businesses to respond to claims from the residents regarding the use of both Ravensbury Terrace and Ravensbury Road by large HGVs. Following this meeting and further discussion with a Council officer the businesses were able to provide some clarification regarding their operations and with respect to the transport issues specifically provided an undertaking to mitigate the issues raised by residents as follows:

## ***Ravensbury Terrace – Proposed width Restriction***

### Deans Blinds

All installations are carried out using Transit type vans and no larger vehicles. Most deliveries and pickups are made on vehicles varying in size from 7.5 to 20 tons. No deliveries are accepted after-hours or at weekends. Stock materials are delivered from European factories on long pallets to accommodate 7m long units on articulated lorries which includes goods for other businesses in the UK. Delivery frequency is lower now than in 2007/8 due to the downturn as a result of the current economic situation. The deliveries requiring use of a large HGV occur approximately once every two months depending on demand.

Deans have asked their European supplier to comment on how they might be able to change their transport methods. Their response indicates that they are being responsive in reducing the potential for these deliveries causing problems for the local community.

### Anglo-Austrian Patisserie Ltd

The Managing Director of this business, which is one of the largest operating from the HIE, has reviewed his records of available data and has established a variance in the volume of production from 2007 which would reasonably result overall in a decrease in the frequency of deliveries to the HIE. Since 2010 there has been a year on year reduction in production from this unit. It was also confirmed that as the nature of the goods produced had not changed materially over the last few years this was also the case for the size of vehicles used. The finished goods to be transported are light weight but bulky which is why they have always been distributed by articulated HGVs. Hence a typical load of 24 pallets would take up a full HGV trailer but only have a Gross Goods Weight of about 4T to 8T depending on the mix of products loaded.

As an operation they are open 24 hours a day on certain days of the week, varying with weekly demand. However the goods in and out operation is generally restricted to operating between the hours of 5.30 am and 9pm, with the night warehouse only operating to supply goods internally to the operation within the site. The Managing Director has written to his suppliers and hauliers asking them, where possible, to try and restrict movements on Ravensbury Terrace to between the hours of 5.30 am and 9 pm. However one of their customers has a requirement for their products arriving at their depot at 4am daily, which necessitates that a 7.5T vehicle leaves the HIE at approximately 1am every morning. It cannot be guaranteed, due to operational needs of all the different businesses involved, that all other vehicles arrive between these stated hours. However, it should be noted that access to the HIE is always available and any vehicles arriving outside these hours would continue onto the industrial estate and not park in Ravensbury Terrace.

## **Ravensbury Terrace – Proposed width Restriction**

The issue of large HGVs using Ravensbury Road and attempting to turn into Ravensbury Terrace was mentioned at the meeting in March 2013. Where this turn could not be accommodated this has resulted in damage to private property and the highway in the past and potential road safety concerns as the driver of the HGV has to reverse out of Ravensbury Road. This was accepted by the businesses as occurring on rare occasions. This has been partly addressed by LBW putting up additional signage at the junction of Ravensbury Road with Merton Road advising drivers that this route is unsuitable for HGVs. In addition, the Managing Director of the Anglo-Austrian Patisserie Ltd has included in his letter to his suppliers asking them to ensure that they direct their vehicles in via Penwith Road and then Ravensbury Terrace.

17. Video evidence undertaken in March 2013 provides a log of the number and type of van/lorry and HGV usage during the night and early hours of the morning over a period totalling 5 days. The HGV's classification was established from the marking on the vehicle which represents any vehicle of a size exceeding 7.5 tonnes. This period being chosen in response to concerns from residents regarding the use of this road network at night and the resulting disturbances that can occur. The log shows a small number of large (long well base) HGV's using the facility during the night and early morning and all accessed the HIE via Penwith Road during this time. From these observations the stated deliveries undertaken by the Anglo-Austrian Patisserie Ltd at approx 1.00 am can be confirmed. In most cases the commencement of the deliveries to/from the HIE was from 05:30 each morning. The number of HGV's movements recorded during this period is provided in Table 2 below.

<b>Day</b>	<b>Time period recorded</b>	<b>No of HGV moments</b>
Saturday 9 <sup>th</sup> to Sunday 10 <sup>th</sup> March 2013	21:30 to 08:30	None
Monday 11 <sup>th</sup> March 2013	00:03 to 07:12	12
Monday 11 <sup>th</sup> March to Tuesday 12 <sup>th</sup> March 2013	22:01 to 07:44	7
Tuesday 19 <sup>th</sup> March 2013	00:34 to 07:01	5
Thursday 21 <sup>st</sup> March 2013	00:42 to 06:15	2

## **PROPOSALS**

18. The outcome of the consultation process with residents and businesses indicates that there is no overall support for the width restriction proposal. In addition the LBM have objected to the proposals. There are a number of other factors to be considered as outlined below.

## ***Ravensbury Terrace – Proposed width Restriction***

- a) Residents – Concerns expressed regarding transferring the problem to other roads in this case within an adjoining borough and hence raising the potential for road safety concerns. No support overall following the consultation process, however proposal supported in Wandsworth but not in Merton by those who responded.
- b) Businesses – Effect that the proposals would have on their business operations where the use of large HGVs delivering to the HIE is necessary. Whilst alternatives exist, to use smaller vehicles, these would be commercially unacceptable and therefore could result in the need for the businesses to consider ceasing operations. In the case of one business the size of the unit required dictates the size of the lorry required. Section 122 of the Road Traffic Regulations Act 1984 requires a local authority exercising its function under that Act to have regard to securing and maintaining reasonable access to premises.
- c) Response from adjoining Council – LBM object to these proposals and would object to any statutory process if it were to be progressed to this stage.
- d) Extent of the problem – The road traffic accident record does not indicate a particular issue along the residential road network where the deliveries currently take place however it is accepted that third party damage has occurred and hence the potential for accidents is real. However it would appear that if the large HGVs use the 'designated route' i.e. Penwith Road and Ravensbury Terrace that issues of such concern are largely mitigated. Whilst the number of large HGVs using the HIE is not considered significant, bearing in mind it is an active industrial estate, the size and presence of a single large HGV negotiating local residential roads can present potential concerns compared to a standard sized vehicle.
- e) Alternative route - The alternative route for any vehicle that would not be able to negotiate the proposed width restriction and wishes to access the HIE is Penwith Road into Acuba Road and then into Haslemere Avenue. The majority of the vehicles not able to use Ravensbury Terrace would be able to use the alternative route. In the case of the very large HGVs, accommodation works would be required. The generated swept paths for the wheels and body of a vehicle are a good approximation of the course that would be taken by a competent driver. The swept path analysis for large vehicles travelling from Penwith Road into Acuba Road and also from Acuba Road into Haslemere Avenue shows that there would be conflict with parked vehicles and also the footway at each junction turn. It is therefore concluded that the manoeuvres are not possible without modification to the existing highway layout. This would require the agreement of LBM.

## ***Ravensbury Terrace – Proposed width Restriction***

- f) Statutory process to make the Order – There are a number of considerations that the Council would have to make in terms of making an order under the Road Traffic Regulation Act 1984, including the requirements set out in section 122 of that Act. Given the outcome of the consultation exercise and associated considerations as outlined in this report it would not be appropriate to progress to the order making stage.
19. In light of the responses from the consultation and the specific representations made by businesses it is apparent that the impact of the proposals on the businesses would be to significantly affect the access to their premises to the extent that there would no longer be reasonable access to their businesses as well as potentially affecting the passage of public service vehicle and emergency vehicles. The alternative routes that could be used would require modification of the existing highway layout and adversely impact the parking facilities of the locality.
20. The outcome of monitoring of the flow of traffic on Ravensbury Terrace identifies that there is an impact on the local amenity on Ravensbury Terrace. The use of alternative routes would likely shift the impact on amenity to other surrounding roads and so not alleviate the impact on the amenity of the local area. The proposed undertakings from the businesses and monitoring of the position by officers should improve the amenity of Ravensbury Terrace without unreasonably impacting the expeditious, convenient and safe movement of vehicular and pedestrians and the provision of suitable and adequate parking facilities.

### **RECOMMENDATION**

21. It is accepted that residents of Ravensbury Terrace and Ravensbury Road have on occasion been in the position of being woken up at night or having suffered damage to their cars as a result of large HGVs attempting to use in particular Ravensbury Road to access the HIE. The Council has reduced the likelihood of this occurring by placing signage at the junction of Merton Road to direct drivers to use Penwith Road. The use of Ravensbury Terrace by large HGVs wishing to access the HIE has occurred seemingly since the width restriction in Mount Road in LBM was installed in the early 1980's. The business owners, who use the large HGVs, are appreciative of the concerns expressed by residents, however they have presented a case to indicate that the proposal for the width restriction is not feasible and would have a detrimental affect on their businesses as outlined in this report. It is considered that the proposal would not be compliant with Section 122 of the 1984 Act. Having regard to all relevant matters it would not be reasonable to proceed with the order for the width restriction. Hence it is proposed not to proceed with the installation of the width restriction.

## ***Ravensbury Terrace – Proposed width Restriction***

22. Whilst there has been a suggestion that the London Lorry Ban could be used to alleviate the issues reported by residents, this control only applies to HGVs passing through London, not those accessing an industrial site within the capital.
23. Whilst it is not proposed to implement any physical restrictions, the close involvement and actions by Councillors and officers has led to a commitment from the business using the largest vehicles to minimise the effect their deliveries have on the local residents. Whilst this relies on goodwill, it is a positive outcome of the dialogue and the Council will monitor the effect of this undertaking. In addition, in conjunction with a spokesperson for the residents and the businesses it is proposed to pursue the development of any highway measures that can be identified, that can assist in minimising concerns expressed by residents.
24. In recognition of the issues faced by residents as a result of large HGVs using residential roads it is proposed that the council lobby the appropriate authorities to determine if powers can be devolved, where they currently exist and are actionable by other authorities, enabling local authorities to take direct action or impose other measures as may be deemed necessary.

### **COMMENTS OF THE BOROUGH SOLICITOR**

25. Section 122 of the Road Traffic Regulations Act 1984 imposes a duty on a local authority when exercising its functions under that Act to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway so far as is practicable having regard to a number of factors set out in that section including the desirability of securing and maintaining reasonable access to premises, the effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy vehicles so as to preserve or improve the amenities of the areas through which roads run, the importance of facilitating the passage of public service vehicles and any other matters appearing to the local authority to be relevant.
26. Human Rights legislation requires a local authority to ensure that it does not interfere with the peaceful enjoyment of possessions (including property) and where this is unavoidable, that the interference must be lawful and necessary in the public interest and there is proper legal basis for interference. Any such interference must be justified and proportionate.

### **COMMENTS OF THE ECONOMIC DEVELOPMENT OFFICER**

27. The Economic Development Officer comments that while road safety is a serious issue, the ability of businesses to get access to their business

## ***Ravensbury Terrace – Proposed width Restriction***

at appropriate times is also a serious matter. The Wandle Valley is one of the few remaining industrial areas in south west London and while Haslemere Industrial Estate is in Merton, it is part of the economic infrastructure of the wider area providing jobs, business opportunities and services to Wandsworth and has an impact on the local Earlsfield economy.

28. Given the above the conclusion reached and recommendation made is supported although with reference to future highway measures significant material regard needs to be given to sustaining employment and business activity in that location for the benefit of Wandsworth residents.

### **COMMENTS OF THE DIRECTOR OF FINANCE**

29. The Director of Finance comments that the proposed monitoring of business owners efforts to minimise the effects of deliveries in Ravensbury Terrace, and discussion with businesses and residents to establish further highway measures for implementation described in this report will be contained within current 2013/14 Traffic Management revenue budgets.

---

A G McDonald  
Director of Environment and Community Services

The Town Hall,  
Wandsworth,  
SW18 2PU.

15th April 2013

### **Background Papers**

No background papers were used in the preparation of this report.

All reports to Overview and Scrutiny Committees, regulatory and other committees, the Executive and the full Council can be viewed on the Council's website ([www.wandsworth.gov.uk/moderngov](http://www.wandsworth.gov.uk/moderngov)) unless the report was published before May 2001, in which case the Committee Secretary (Mr M Newton – 020 8871 6488; email [mnewton@wandsworth.gov.uk](mailto:mnewton@wandsworth.gov.uk)) can supply it if required.

<b>Q3- ARE YOU IN FAVOUR OF INTRODUCING A WIDTH RESTRICTION ON RAVENSBURY TERRACE AT THE BOROUGH BOUNDARY ALONGSIDE FLANK WALL OF 154 RAVENSBURY ROAD?</b>									
<b>STREET NAME</b>	<b>No.</b>	<b>No.</b>	<b>%</b>	<b>YES</b>		<b>NO</b>		<b>UNDECIDED</b>	
	<b>DELIVERED</b>	<b>RESPONSE</b>	<b>RESPONSE</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>
Acuba Road	35	4	11%	0	0%	4	100%	0	0%
Arragon Road	144	3	2%	2	67%	1	33%	0	0%
Bodmin Street	52	3	6%	1	33%	0	0%	2	67%
Brooklands Avenue	34	9	26%	2	22%	7	78%	0	0%
Dawlish Avenue	38	20	53%	0	0%	20	100%	0	0%
Dounesforth Gardens	30	2	7%	0	0%	1	50%	1	50%
Duntshill Road	96	9	9%	8	89%	1	11%	0	0%
Flock Mill Place	17	1	6%	1	100%	0	0%	0	0%
Gordondale Road	37	10	27%	1	10%	7	70%	2	20%
Haslemere (Industrial Estate)	32	9	28%	1	11%	8	89%	0	0%
Haslemere Avenue	37	27	73%	4	15%	23	85%	0	0%
Havana Road	24	7	29%	0	0%	6	86%	1	14%
Knaresborough Road	25	4	16%	1	25%	1	25%	2	50%
Lucien Road	20	2	10%	0	0%	2	100%	0	0%
Mount Road	56	15	27%	1	7%	14	93%	0	0%
Penwith Road	276	43	16%	25	58%	13	30%	5	12%
Ravensbury Road	196	54	28%	29	54%	17	31%	8	15%
Ravensbury Terrace	20	12	60%	5	42%	7	58%	0	0%
Riverdale Drive	38	4	11%	2	50%	2	50%	0	0%
Strathville Road	176	15	9%	9	60%	2	13%	4	27%
Wellington Road	38	6	16%	2	33%	3	50%	1	17%
<b>TOTALS</b>	<b>1421</b>	<b>259</b>	<b>18%</b>	<b>94</b>	<b>36%</b>	<b>139</b>	<b>54%</b>	<b>26</b>	<b>10%</b>



Sch  
London Borough  
of Wandsworth

Consultation Area  
Shown Shaded

Proposed Location of Width restriction

Haslemere  
Industrial Estate

Existing Width restriction  
in Merton

Borough boundary

London Borough  
of Merton

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### Ravensbury Terrace - Width Restriction Location Plan and Consultation Area

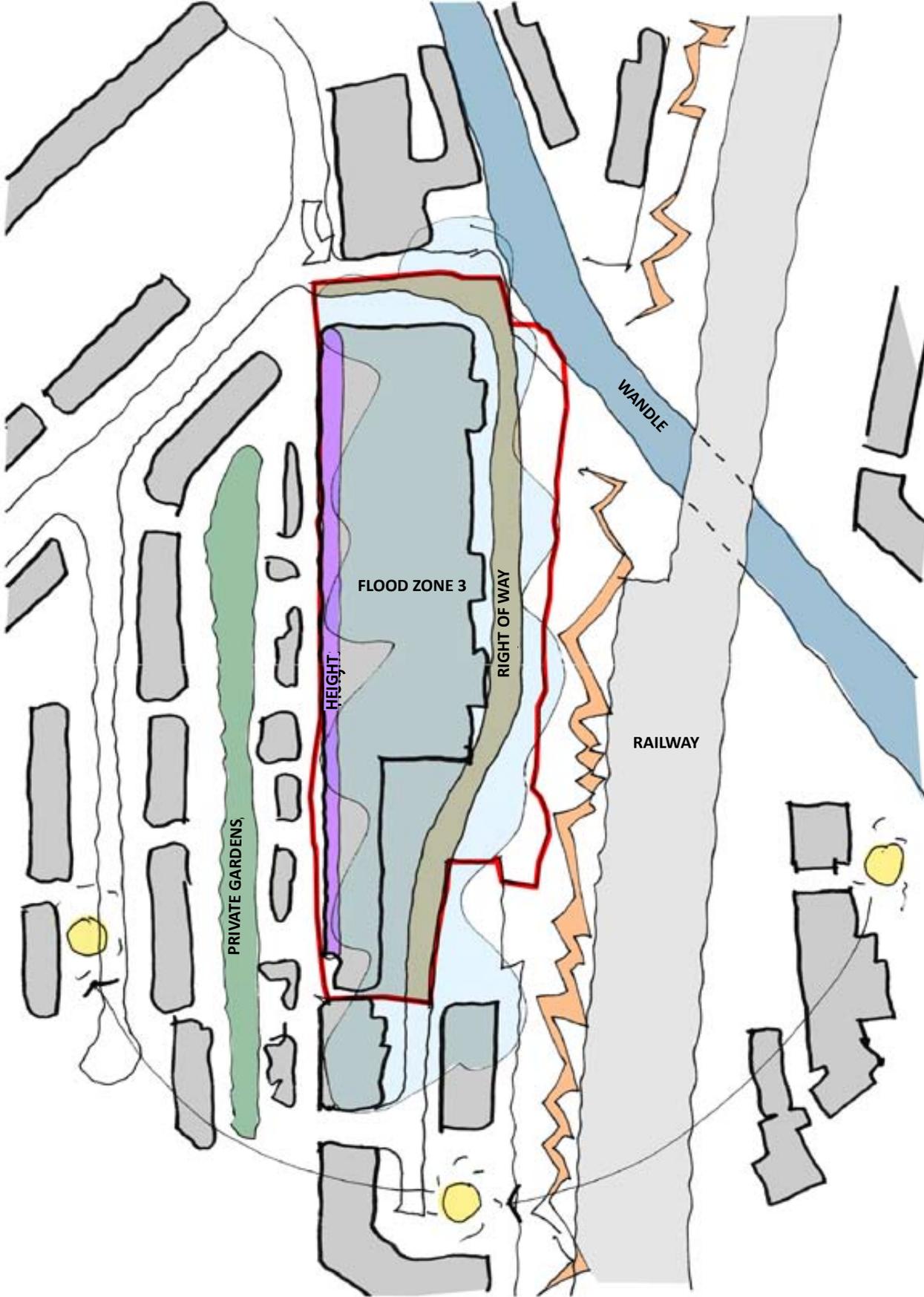
## Appendix 3 – Initial Site Proposal by MAA



## Initial Proposal

1 - 4 Haslemere Industrial Estate  
Earlsfield , SW18 4LR

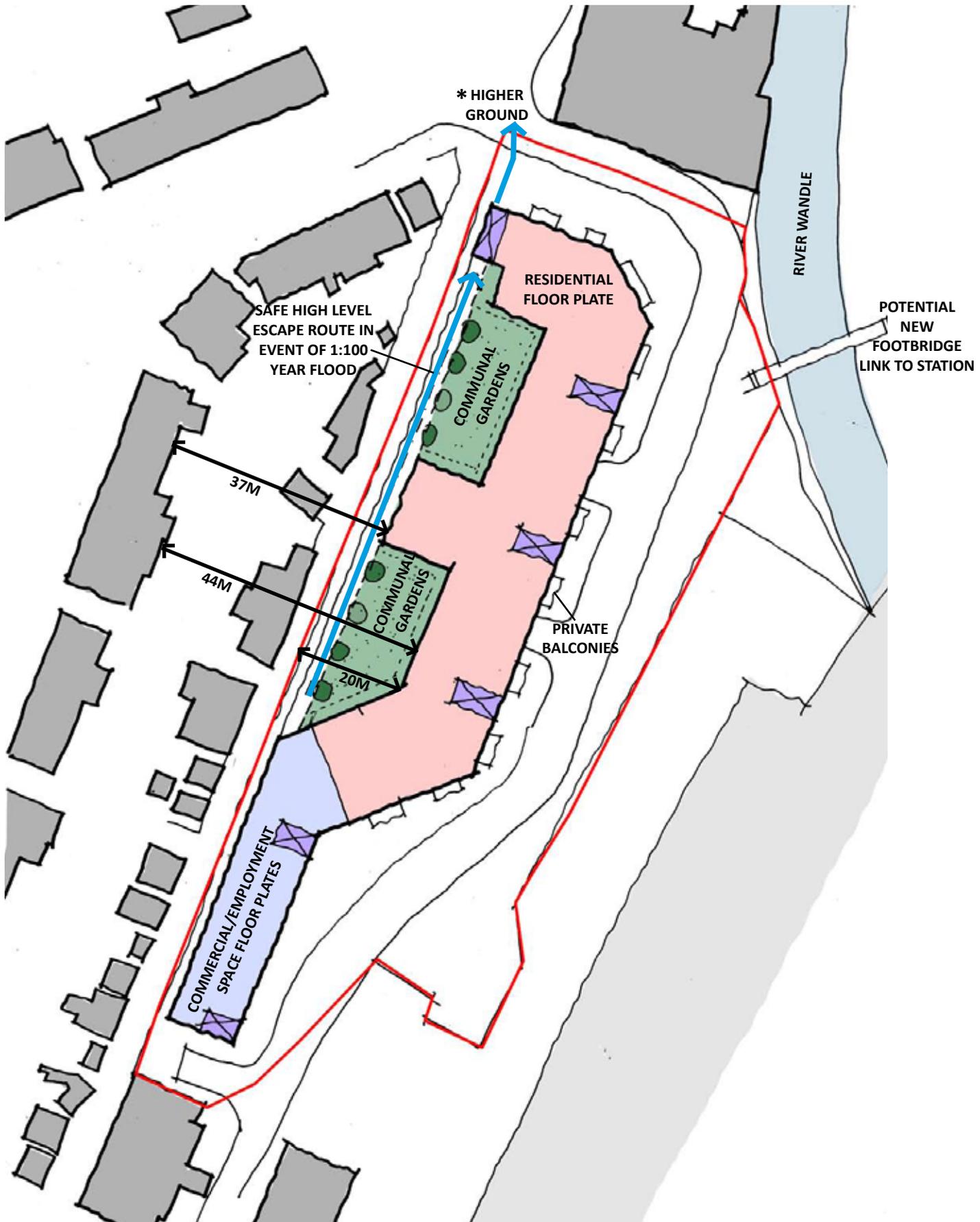
11th December 2013  
Rev\_D



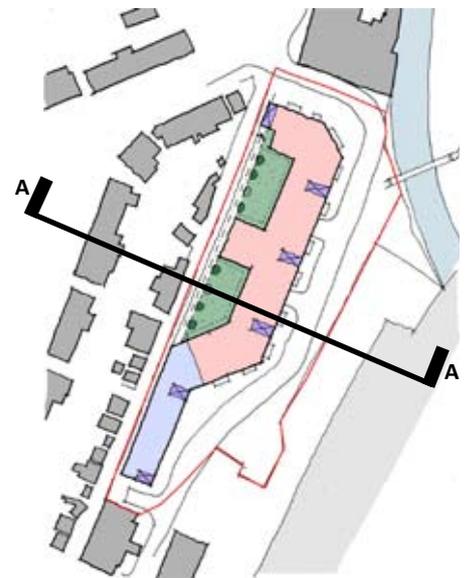
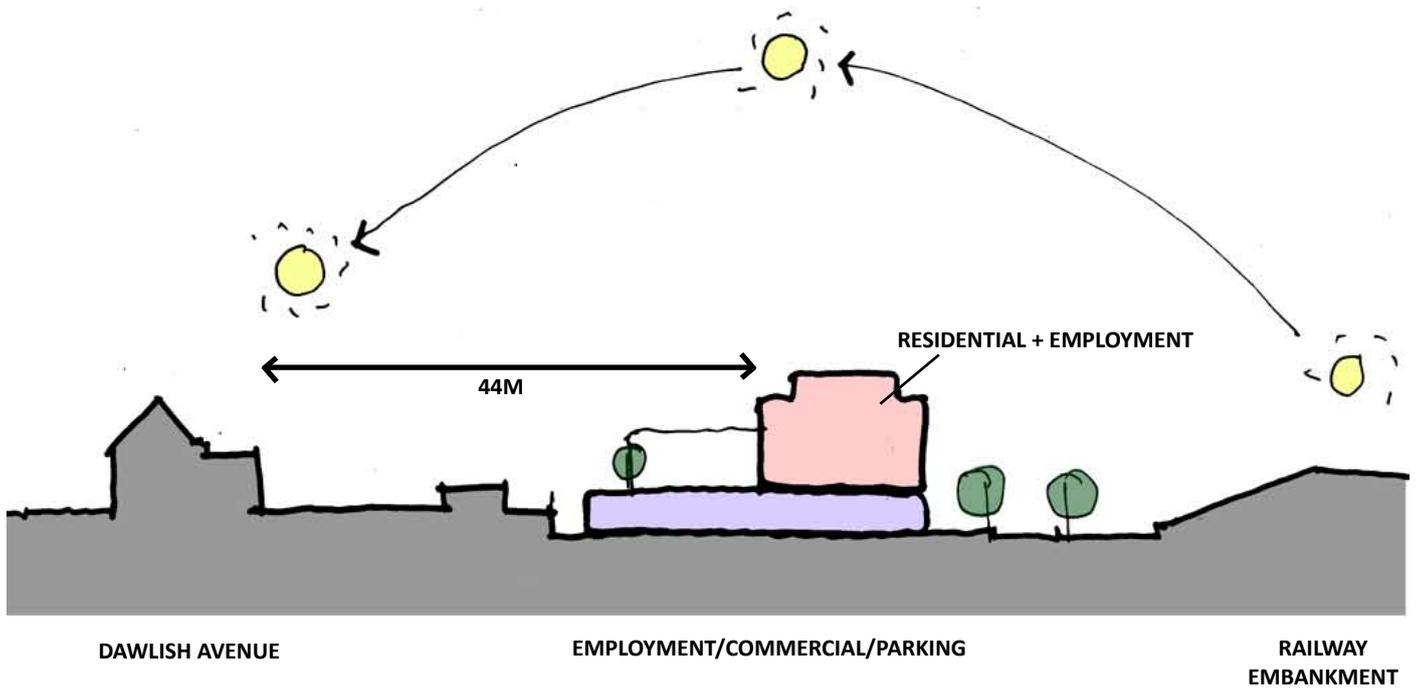
# initial proposal - ground



# initial proposal - typical



# intial proposal - site section AA



## Appendix 4 – Initial Transport Appraisal by Motion

Project: Haslemere Industrial Estate, Earlsfield  
Prepared by: Damian Tungatt  
Date: 12<sup>th</sup> December 2013.

### 1.0 Introduction

- 1.1 Motion has been instructed by Astranta Asset Management and the landowners of Haslemere Industrial Estate to consider the traffic and transport impacts of the existing land uses and to then consider the possibility of the site accommodating alternative uses, such as residential, in the future. The possibility of accommodating alternative land uses on the site has been recognised by the Council in their emerging guidance and this summary note has therefore been prepared to set out the key considerations for different land uses options and to make recommendations on the transport and access constraints and opportunities of the site.

### 2.0 Existing Situation

- 2.1 Haslemere Industrial Estate is situated within a residential area located some 500m east of Garratt Lane with a High Street providing a number of shops, services, bars and restaurants.
- 2.2 Vehicular access to the Industrial Estate is gained via a priority junction from Haslemere Avenue. Haslemere Avenue is predominately residential in character and accommodates on street residential parking along both sides of the carriageway, consequently on street parking reduces the effective carriageway width to between 3.5 – 4.5 metres along the majority of its length. This narrow running lane results in larger vehicles associated with the Haslemere Industrial Estate having to frequently give way to opposing traffic.
- 2.3 Haslemere Avenue is traffic calmed along its length and a width restriction is also in place to the west of the Industrial Estate limiting vehicles wider than 7ft from passage. Any vehicle of a greater width is directed out of Haslemere Avenue, with the intention that it heads away from the residential areas and towards the A217 Garratt Lane whereupon it can disperse into the wider area on the strategic road network.
- 2.4 However, following site observations and as evidenced in recent consultation by the London Borough of Wandsworth, large vehicles from the Industrial Estate frequently seek to head to and from Merton Road to the east via Ravensbury Road, rather than towards the A217 in the west. This results in vehicles using a narrow residential street to access the wider highway network.
- 2.5 To avoid this route being used by large vehicles, the London Borough of Wandsworth consulted with business and residents in proximity to the site (including those falling within the adjacent London Borough of Merton) in 2012, with a view to implementing vehicle width restrictions along Ravensbury Road. The consultation resulted in the proposals not being recommended for implementation based on a majority response. However, when considering the findings of this process in more detail, it was evident that residents in other adjacent streets objected to the proposal over concern that large vehicles would be displaced onto their streets which are also unsuitable in width and character to accommodate a high number of large vehicles. Understandably, the businesses on the Haslemere Industrial Estate also objected to the proposals owing to the impact such a scheme would have on the operation of the business.

- 2.6 Following the decision not to introduce a width restriction, a general understanding has been entered into with the businesses on the Haslemere Industrial Estate to limit the impact their vehicles have on the local residential areas. Whilst this intent is to be supported, there are limited statutory powers to currently enforce such an arrangement. In addition, even when using the signed route, site observations concluded that larger 10m rigid vehicles accessing the Industrial Estate were often opposed by oncoming traffic. Heavy Goods Vehicles (HGV's) would have particular difficulty accessing the site and it would be reasonable to conclude that it is not particularly well located for industrial uses.
- 2.7 In addition, if new consultation was to be successful at a later date, the opportunity for large vehicles to head east would be severely restricted and this would ultimately impact on the viability of business operations.

### **3.0 Alternative Land Uses**

- 3.1 If the site is to be considered for alternative land uses, such as residential, its accessibility to public transport, employment and leisure destinations needs to be established.
- 3.2 A PTAL assessment demonstrates that the entire site falls within an area of PTAL 3 suggesting it has a reasonable level of access to public transport services. Earlsfield Station is located only 600metres away providing regular services to London Waterloo, Dorking and Guildford. The nearest bus services operate along Garratt Lane with the closest bus stops being located only 550metres from the site. The bus routes serve numerous destinations including Putney, Tooting, Wimbledon, Vauxhall and London Victoria. It is therefore evident that the site is well located for access to employment and leisure opportunities across London and the South East which would suggest it could support a residential led development. In addition, a number of shops and services are accessible along Garratt Lane and would be well within walking distance for any resident.

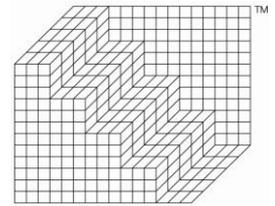
### **4.0 Vehicular Trip generations of alternative land uses**

- 4.1 Whilst further study would be required on the exact detail of any alternative option, given the location of the site and its proximity to a number of public transport services, it is expected that the peak hour vehicular trip generation from any residential use that could be accommodated on the site would be comparable to the vehicle trips generated by the existing land uses. Importantly however, residential vehicular trips are predominately undertaken by private car which can easily navigate the local road network. In addition, the existing uses on the Industrial Estate often generate a number of large vehicle movements late at night and in the early morning which has been reported as causing nuisance to neighbouring residents. It is therefore considered that the location of the site lends itself to better accommodate land uses that do not generate a significant number of large vehicle movements.
- 4.2 Furthermore, any redevelopment would come forward in accordance with local parking standards and the guidance set out in the London Plan which seeks to show restraint in respect of car parking provision and to ensure sufficient facility is provided for refuse collection, cycling and site management to ensure no detriment to the local highway network.
- 4.3 Were more than one land uses to be proposed for the site; consideration needs to be given to the environment to be created. Aside for the problems already highlighted in the wider area, industrial uses would be difficult to integrate with a residential land use owing to the differing requirements of each in terms of parking, pedestrian activity and vehicle conflict. It would therefore be recommended that any additional land use is complimentary to any proposed residential and is a low trip generator. Such land uses could be office accommodation, gyms and community uses.

## 5.0 Summary

- 5.1 It is evident from this initial overview of the Haslemere Industrial Estate that the site would be better suited to accommodate development, such as residential, that does not generate a high number of trips by large vehicles. The recent consultation undertaken by the London Borough of Wandsworth has demonstrated that there are significant problems in seeking to accommodate such vehicles on a constrained local road network. Whilst the recent consultation attempted to find a workable solution, a number of difficulties were highlighted in achieving this, not least the impact any restrictions would have on the businesses located on the estate and the conclusion that any measures of mitigation would only result in displacing large vehicles into unsuitable streets. The consultation demonstrated that limited opportunities exist to appropriately provide for such industrial uses in a predominately residential area.
- 5.2 However, the site is well located for a future land use that could maximise trips on the public transport network. Such a change of use would better integrate the Site with its local area and alleviate the difficulties of providing access to an industrial estate.

# Appendix 5 - Initial Flood Risk Technical Note by Buro Happold



Buro Happold

## Technical Note

project Merton's Sites and Policies Development Plan  
subject Flood Risk Issues  
job no Haslemere Industrial Estate (Site Proposal 70)  
Date 11/12/2013

Revision	Description	Issued by	Date	Approved (signature)
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Buro Happold has been asked to comment on the flood risk issues associated with a proposed mixed use development at Haslemere Industrial Estate, Earlsfield shown on MAA Architects Initial Proposal Plan dated 10th December 2013.

The site lies within the functional flood plain of the River Wandle designated as Flood Zone 3b considered to have an annual probability of greater than 5 % ( 1 in 20).

The existing development comprises a block of four units used for industrial purposes constructed in the 1920's and it is understood they are approaching the end of their useful life. The owners of the site have therefore investigated whether the site can be re-developed for industrial purposes, but it is simply not economically viable to do so. On this basis, the owners have sought to understand if alternative uses can be accommodated on the site and highlighted the site's availability to Officers at the Council.

The Environment Agency has commented on the proposed development in their consultation response dated 27th February 2013 in which they state their support for the continuation of the existing land use of industrial /employment over the suggested use of residential at the site. Also there should not be an increase in the built foot print and loss of flood plain.

Within a highly urbanised location such as the London Boroughs there is inevitably increased pressure for development. It is unlikely that development can always be accommodated on land with a lower risk of flooding. Account should be taken of the flood risk vulnerability and how this risk can be mitigated. The Strategic Flood Risk Assessment for Wandsworth and Merton recommends that in flood prone areas residential development is located at first floor level.

The principles to be applied when determining whether a development is acceptable in a high flood risk zone are twofold, firstly the development must be safe for the occupants both structurally, and in the event that the occupants need to leave the buildings in an extreme flood event. This can be achieved by a flood warning and evacuation plan and the availability of 'dry' egress to higher ground. Secondly the development should not increase the flood risk to areas elsewhere. This can be achieved by the introduction of sustainable drainage techniques within the developments drainage system, also there is no diminution of flood stage capacity due to the development. The MAA Initial proposals include under croft parking which will increase the volume of flood water that can be stored on the site when compared with the existing building arrangement.

A comparison of the Environment Agency's flood mapping with the ground levels obtained by LIDAR indicates that a walkway at first floor level, connecting the residential units can be landed onto the higher ground (above the indicated flood level) at the north west corner of the site enabling the occupants of the development to leave the building on foot in the 1 in 100 year flood event.

In accordance with normal planning practice the development will require a site specific flood risk assessment to accompany a planning application. The detail of the drainage system, egress route and flood warning an evacuation plan will be included within the flood risk assessment.



*Real value in a changing world*

Catherine Seddon

Associate Director

22 Hanover Square

London

W1S 1JA

+ 44 (0)20 7087 5479

[catherine.seddon@eu.jll.com](mailto:catherine.seddon@eu.jll.com)

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