



REDEVELOPMENT OF ABBEY WALL WORKS, STATION ROAD
Planning application 19/P4266

A response by Wandle Valley Forum
January 2020

1. Wandle Valley Forum provides support and an independent voice for 130 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle. We have considered the proposals for redevelopment of Abbey Wall Works for 72 flats and 5,900 sq. m of commercial or retail use in the context of development plan policies, its location in Wandle Valley Conservation Area and within the Wandle Valley Regional Park buffer zone, the site's historic function and the Wandle Valley Forum Charter (<http://bit.ly/27Yal2m>). This development and the importance of this area confirm the benefit to be derived from preparing a wider masterplan.

2. Abbey Wall Works is an important location within the context of the Wandle Valley. It occupies a key site in the former estate of Merton Priory, the most significant historic site within the Wandle Valley, and a nationally listed stretch of the Priory Wall forms part of the boundary. The very name of the site recognises its historic role as the main approach to the precinct of Merton Priory. The eastern end is also adjacent to the Wandle river and the Wandle Trail. As can be seen, the boundary of the Wandle Valley Conservation Area was specifically drawn to include this gateway site:

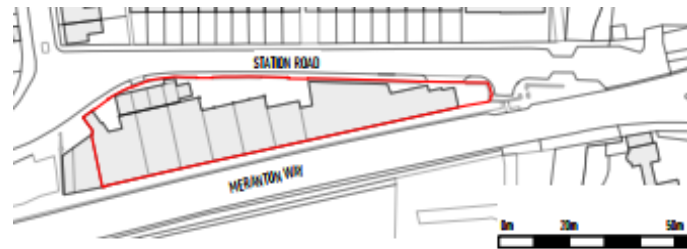


3. We recognise the site currently has a poor quality environment and would benefit from appropriate investment and development which responds positively to the character and history of its location.

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Please respond to Chair, Wandle Valley Forum, c/o 43 Bramcote Avenue, Mitcham CR4 4LW

4. We dispute the claim on the application form that the site is more than 20m away from a watercourse. Various documents describe the Wandle as being 25m away when the site location map clearly shows that the middle of the Wandle is less than 20m away from the boundary.

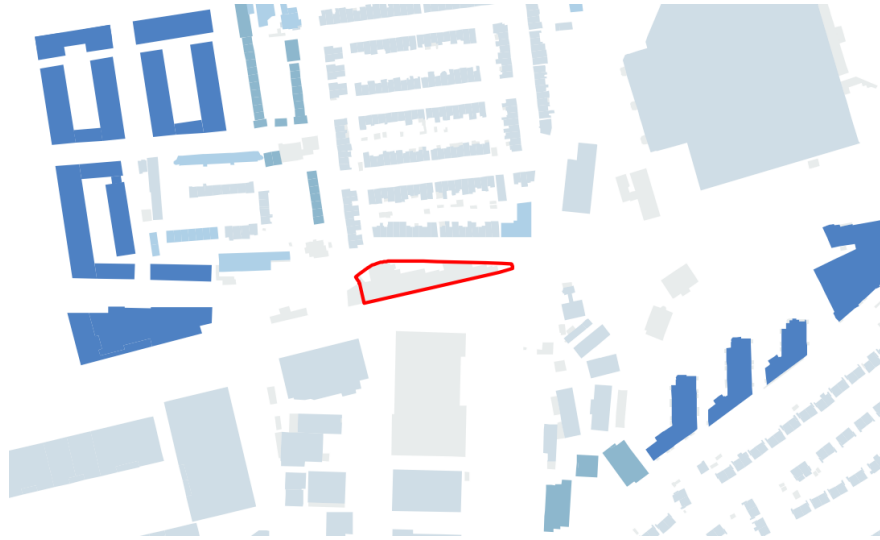


5. This is a symptom of the central failure of the development to recognise and respect its important context and the relationship to both the river and the site's history.

6. The Statement of Community Involvement accompanying the proposals is unusually negative in its report of public views, showing that nearly half of those who provided comments did not support the scheme and only a quarter offered support. The changes made to the scheme to reduce its impact do not respond adequately to the feedback provided. We also note that the Statement also references a meeting with a MOLA archaeologist to discuss the "*historic, listed Roman wall on the site.*" The listed wall is mediaeval and post-dates the Romans by over 1,200 years. This lack of understanding and consideration for the site's heritage raises questions over the quality of both the information presented with the application and the community consultation.

7. We object to the proposed height, mass and design approach. This results in a development which draws attention to itself rather than sitting easily within the context of the Wandle Valley and its surroundings. This will have a particular impact on the listed Priory wall which currently runs alongside low rise industrial buildings that have a largely neutral impact. These will be replaced by an overbearing, dominating six storey development that will cause significant harm to this designated heritage asset.

8. The Design and Access Statement demonstrates the low rise nature of development along the course of the river, between the higher developments associated with High Path and beyond Merton Abbey Mills. The proposed development will disrupt this and be visually intrusive in a location which should be free of higher rise buildings. The gateway location to the Conservation Area does not require a "*landmark building*" of excessive height which will detract from rather than preserve or enhance its character.



9. The development will cause significant visual intrusion in key views from the Wandle Trail as it approaches Merton Abbey Mills and the Conservation Area from the south. As shown in the photo below there is currently a pleasing aspect, framed by trees and the river and screened from the low rise development on the opposite side of Merantun Way. This view would be replaced by the extensive south elevation of the new building extending significantly above the height of the trees shown. This key view is not addressed in the supporting information.



10. The scheme seeks to reference its context in the design detail. This is not extended to the top storey which presents as an incongruous rectangular block in the scheme drawings.

11. We share the view that the listed Priory Wall is “*underappreciated*” but do not believe its significance is addressed by the new proposals. We are concerned by the relationship between the new buildings and the listed Priory Wall, including the creation of a narrow passage running along the inside for most of its length. This will not serve well as a

functional route and is largely a dead end along the main section of the listed Priory wall. It also serves as a poor outlook for the ground floor flats. The design approach fails to take this opportunity to increase appreciation of the extent and character of the listed structure. It is likely to become a neglected area and the buildings need to be pulled back and improved access provided to create a meaningful space.

12. The planning application includes a need for Listed Building Consent for work on the wall but this work is not described other than in the most general terms. There is a lack of a method statement or any clear assurance that it will be undertaken to the standard necessary for such a significant structure.

13. We note that the scheme's ecological assessment of the potential impact on the Wandle concludes that "*construction could result in indirect effects, such as the introduction of waterborne pollutants and dust deposition etc. These effects have the potential to be significant*" and ask that, if the scheme were to be permitted, it is conditional on no such impacts occurring during construction.

14. Our central interest in the site relates to its historic value and the relationship to the Wandle and the Wandle Trail. We note, however, the poor quality of accommodation provided (with 42% of the flats being single aspect, despite London Plan (intend to publish) Policy D6 stating development should "*normally avoid the provision of single aspect dwellings*"), and the failure to meet policy requirements for affordable homes. We also question the suitability of the site as a location for a car parking free development and the lack of ambition in the sustainability approach that seeks to do no more than meet regulatory requirements.

15. National planning policy requires local planning authorities to take account of

*"a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
c) the desirability of new development making a positive contribution to local character and distinctiveness"*

(NPPF, paragraph 192)

16. This requires prospective development actively to seek out ways to enhance heritage assets and their contribution. The proposals fail to do this. They are largely either passive in their approach or cause harm to designated heritage assets, including the listed Priory wall.

17. We ask that planning permission is refused for this scheme on grounds of unresolved conflicts with development plan policies CS1, CS5, CS8, CS14, DM D1, DM D2, DM D4 and harm to the Conservation Area and designated heritage assets. We would welcome the opportunity to work with the applicant on future development plans.