



**REDEVELOPMENT OF ABBEY WALL WORKS, STATION ROAD  
Planning application 20/P1412 & Listed Building Consent application 20/P1672**

**A response by Wandle Valley Forum  
June 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 revised proposals for redevelopment of Abbey Wall Works for 58 flats and 204 sq m of commercial or retail (non-supermarket) 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/27Ya12m>). We welcomed the earlier refusal of a very similar development (19/P4266) on ground including its bulk height and form being too dominant for the area. The fact that the scheme and much of the supporting information remains very little changed points to a quick and emphatic decision to reject the plans. The applicant acknowledges that the scheme is essentially the same as that previously rejected in stating that no planning application fee is due and the accompanying Planning Statement confirms *"the revised application maintains the same overall design concept as the first application"*. The continuing debate over this development and the importance of this area confirm the benefit that would 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:

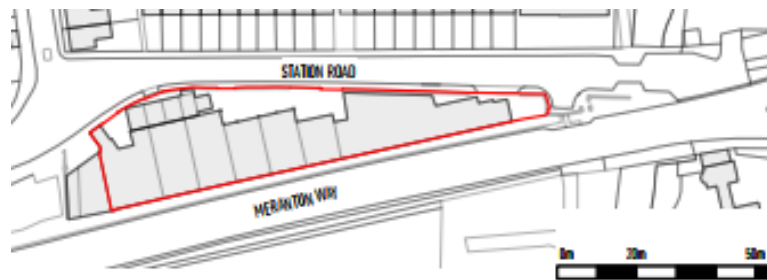


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Please respond to Chair, Wandle Valley Forum, c/o 43 Bramcote Avenue, Mitcham CR4 4LW

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.

4. We dispute the continuing claim on the application form that the site is more than 20m away from a watercourse. This was highlighted in relation to the previous application. 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. As a result the assessment of impact on the Wandle in the supporting documents is underestimated and this should weigh more heavily in the balance of the planning decision. Persisting with such a basic error of fact also undermines trust in the other information provided.



5. This central problem with the development is the failure to recognise and respect its important context and the relationship to the river, the site's history and the existing character of the area.

6. There has been no further public engagement since refusal of the first application for which the Statement of Community Involvement was 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 their support. The latest changes made to the scheme to reduce its impact do not respond adequately to the feedback provided.

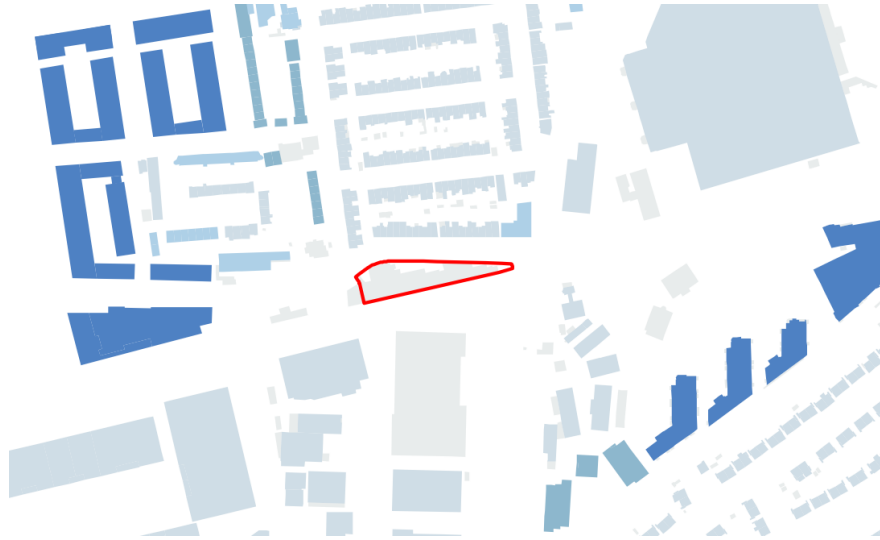
7. We object to the proposed height, mass and design approach. The reduced height and other changes to the proposals from the rejected scheme are insufficient to address the overbearing impact which was a main ground for refusal. The scale of the building makes it a development which draws attention 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 development that will cause significant harm to this designated heritage asset. It will also negatively impact the experience of users of the Wandle Trail replacing the low key view dominated by a trees and vegetation along the highway boundary shown in the Townscape and Visual Impact Assessment (extract below) with a dominating building. We dispute the claim that this impact is "*beneficial*".



8. The development will also 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 above the height of the trees shown. Despite being raised in representations on the previous application this key view is still not addressed in the Townscape and Visual Impact Assessment and the views in the Design and Access Statement do not show winter vegetation.



9. The Design and Access Statement demonstrated 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.



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 1.8m passage running along the inside for most of its length.



12. Despite the changes since the first application this still narrow gap will not serve well as a functional route and is largely a gated 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 still further back and improved access provided to create a meaningful space.

13. The planning application is accompanied by an application 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. No decision on Listed Building Consent can be made on the basis of the information presented.

14. 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*". Consequently, if the scheme were to be permitted, we ask that it is conditional on no such impacts occurring during construction.

15. 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 29% 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, with just 3 of the 58 homes proposed being affordable. 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.

16. We ask that planning permission and Listed Building Consent 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 continue to welcome the opportunity to work with the applicant on future development plans although no effort has been made to collaborate with us to date.