



DEVELOPMENT AT BRITANNIA POINT, COLLIERS WOOD
Planning application reference 21/P0082
A response by Wandle Valley Forum
February 2021

1. Wandle Valley Forum provides support and an independent voice for 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle.
2. We have considered the emerging plans for the development of the land south of the “Britannia Point” tower in the context of the Wandle Valley Forum Charter (<http://bit.ly/27Yal2m>), development plan policy and the expectations set out in our [response](#) to the limited prior public consultation. This is a prominent site near to the Wandle and Wandle Park and with a significant influence on pedestrian connectivity and links in the area. The proposals are for the two tallest buildings ever to be constructed in Merton.
3. We object to the plans. They will harm designated heritage assets, cause significant shadowing of Wandle Park and the Wandle and be a source of widespread visual intrusion. Given the scale and significance of the proposals they fail to take the opportunities available to improve connections through the area or to enhance the local public realm, Wandle or Pickle Ditch. National planning policy is clear that *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”* (NPPF, paragraph 130). The proposals do not take the opportunities available despite them having been identified during prior public consultation.
4. We object to the plans on the following grounds:

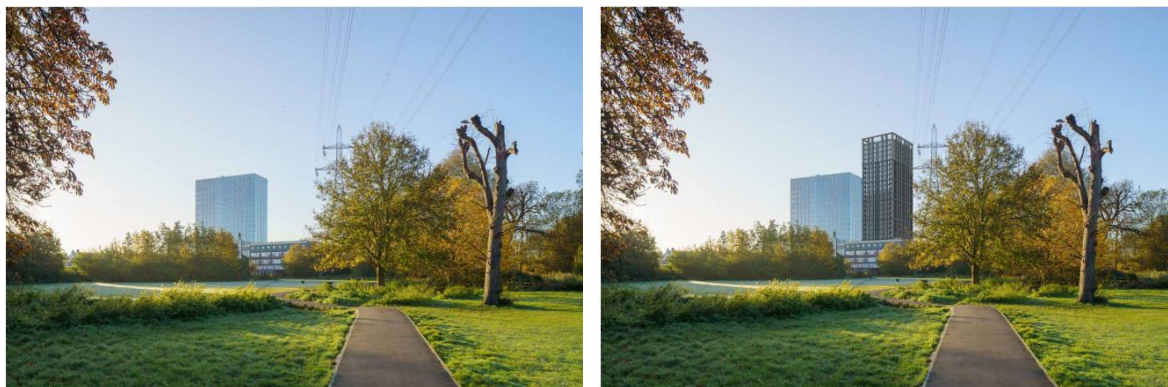
Shadowing – the proposals will cause significant and harmful shadowing of the Wandle and Wandle Park. There will be significant shadowing of Wandle Park between 7am and 11am at the March equinox and 6am and 10am at the June Solstice. The first three hours will also see direct shadowing of the Wandle. This will harm Wandle Valley Conservation Area, significantly reduce public enjoyment of a critical green space designated as Metropolitan Open Land and has the potential to have a major impact on wildlife. These impacts are not addressed.

Visual impact – the existing Britannia Point is visible from across the Wandle Valley and neighbouring boroughs and has a fundamental impact on visual perceptions of the area. This wider impact is not addressed by the plans and goes much wider than the 20 views included in the Heritage, Townscape and Visual Impact Assessment or the Zone of Theoretical Visibility in Appendix 2. No wider viewshed is provided. It is therefore impossible to assess the harm which might be caused both by the building heights and by the creation of an entirely new tall buildings cluster both locally and in long distance views

General enquiries: wandlevalleyforum@gmail.com
Web site: www.wandlevalleyforum.org.uk
Twitter: [@WandleForum](https://twitter.com/WandleForum)

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

from across a large part of south west London. The proposals should not proceed until a viewshed is provided and independently assessed. Notwithstanding this absence of evidence of wider impacts we strongly question the assessment of the impact on some local views. It stretches credibility, for example, to conclude that the following impact on Wandle Park is “contributing positively towards visual amenity”



or that this impact “forms a balanced composition”:



In responding to the Building Better, Building Beautiful Commission the Government supports an approach to managing design based on “local preferences”. Merton Council’s 2020 survey of local preferences in new housing concluded that “taller flatted housing” was the least successful and this scheme fails to overcome its negative impacts:



Permeability and connections - a development of this scale should have a transformative impact on connectivity and permeability well beyond the site boundary, including the problematic local road system and providing improved public access to and through the site. This should include links across Priory Retail Park to Merton Priory Walls and the Pickle and onward to Merton Priory and Merton Abbey Mills, connections to the Wandle Trail and links to Colliers Wood underground station. Instead, the scheme includes no commitments to addressing opportunities beyond its immediate site. The configuration of the scheme even within its own site connects poorly to the surrounding area and the main route between the two towers is bookended by either parking bays or a busy road without a crossing. There is no effective connection even to Britannia Point.

Wind and microclimate – the provision of additional public realm next to Britannia Tower is a significant potential benefit from the plans. This can only be realised if it is supported by active ground floor uses and an appealing microclimate to create a place to linger unimpeded by undue shadow or wind shear. The plans singularly fail to provide this. The supporting *Wind Microclimate Report* confirms “*comfort exceedances*” continue to exist even after mitigation by a combination of screens, trees and hedges, including at some outdoor seating areas. A majority of outside locations examined are not suitable for sitting (suitable locations shown as dark blue circles below) even after mitigation. The report also shows Level 1 and the roof terrace are suitable for only short term sitting. Wind conditions at the service entrances are also below standard.

Figure 4.5 - Pedestrian wind conditions, proposed development within existing surrounds with mitigation, summer



Quality of new homes – The London Plan (Policy D6) is clear that “*Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution....*”. We can see no design constraints to justify plans where more than two in every five dwellings will be single aspect.

5. Any development of this site should be subject to a full archaeological investigation delivered through a non-standard planning condition that requires a comprehensive and detailed approach in light of the exceptional significance of Stane Street which runs close by and other potential archaeological interest.

6. We ask that planning permission is refused. The scheme will harm Wandle Valley Conservation Area and Metropolitan Open Land and is in breach of Merton Local Plan policies CS5, CS13, CS14, DM O1, DM O2, DM D1 and DM D2 and London Plan policies D3, D4, D6, D8, D9, HC3, G3 and SI17.