



DEVELOPMENT OF EDDIE KATZ SITE, 42 STATION ROAD, COLLIERS WOOD
A response by Wandle Valley Forum to planning application 21/P1907
July 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 former Eddie Katz site for 116 homes and 456 sq m Class E uses in two blocks rising to 10 and 13 storeys in the context of the Wandle Valley Forum Charter (<http://bit.ly/27Yal2m>), the London Plan and Merton Council's existing and emerging Local Plan. This is an important and sensitive site alongside the river and located on the site of the main entrance to the church of Merton Priory, the Wandle Valley's premier heritage asset.
3. We have welcomed the opportunity to meet with the developers and to have had a response to our feedback on the initial proposals shared for public consultation. We remain concerned by the limited nature of the material which was published during this stage of the project's development, especially given that Merton Council's Design Review Panel has considered more detailed designs in a closed session. Only extracts of the Design Review Panel report are provided in the information supporting the application and it was rated as AMBER. It is a particular concern that so little information was available to provide a proper sense of the height, scale and mass of the proposed development. This is despite the results of the first public consultation identifying "*Ensuring the architecture is in context with its surroundings*" as a top priority. Our offer to be further involved prior to a planning application being submitted received no response. Our concerns about the pre-application process are not allayed by the information provided with the application. The only meetings convened other than with Merton Council (officers and councillors) were with the Metropolitan Police and ourselves, Wandle Valley Forum. There is insufficient evidence of engagement with the feedback provided by the community and the priorities identified through this process are not successfully addressed in the final application.
4. Addressing each of the priorities from the first public consultation:
 - Providing high-quality affordable housing in Colliers Wood – The proposals fail to provide sufficient truly affordable homes with only 18 of the 46 being for affordable rent and the remainder in shared ownership. This 39% share is below that required by either Merton's existing Local Plan (Policy CS9, 60% social rented) or emerging Local Plan (Policy H4.1, 70% low cost rent). More than one quarter of the flats will be single aspect (28%) in conflict with London Plan Policy D6 that housing development should "*normally avoid the provision of single aspect dwellings*". The only exception is where design considerations require a different approach. This is a relatively unconstrained site and there is nothing in the Design and Access Statement which evidences a design approach

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that could not deliver 100% dual (or triple) aspect flats on the site. We are also concerned by the challenging access to the site which will create significant difficulties in servicing it.

- Creating open and accessible public space for all to enjoy- The ambition for active ground floor uses based around new public realm is welcome but it is not delivered. There are a number of new and important areas of public realm created by the proposals. The most significant of these lies between the two new buildings. This is unlikely to be a successful space given it is bounded by a large entrance lobby, two large bike stores, a blank wall to the substation and the entrance to the switchroom, and its eastern aspect is across a busy supermarket entrance road to a filling station key. It will be neither vibrant nor animated by active frontages. The quality of the microclimate between the two towers is uncertain in the absence of an effective assessment of wind speeds and it will be regularly in shade. A second area of public realm by the unspecified new commercial use is sandwiched between the southern tower and a “*holding zone for 14 bins*” along with a ramp for delivery vehicles. The test of these proposals is whether they provide a mix of uses and a quality of public realm which complements and amplifies the role of Merton Abbey Mills to create a new destination and a place to linger. This requires a higher quality of public realm, greater certainty about the uses within Class E and additional information demonstrating a conducive microclimate
- Improving connectivity for pedestrians and cyclists – This will require significantly more than the provision of a new bridge over the Wandle and pedestrian access along its east bank. This development is an opportunity to improve links across the wider area and it needs to result in links across adjacent land to the pedestrian underpass accessing Merton Priory and Merton Abbey Mills and to Colliers Wood underground station via Merton Priory Walls. This can make a significant contribution to the emerging Local Plan’s Objective to provide “*Better access for heritage*” in Colliers Wood in Policy N3.1. We have been informed by the applicants that “*We are also in discussions with Sainsbury’s on the enabling of future connectivity through to their site*” and this needs to be converted into firm commitments prior to a planning application being determined
- Enhancing and improving the Wandle Trail – The proposals for a new bridge and public access alongside the eastern bank of the river are welcome. This will create new interactions with the Wandle and new routes across it. The scheme should bring wider improvements to the Wandle Trail, including wayfinding, interpretation and improvements to the route running west of the river. These should include measures to reduce conflict between those walking along the Wandle Trail and others cycling. We have written and designed new information boards as part of development taking place near to the river in other locations and would be keen to be involved in this site. All wayfinding, signage and other initiatives should include the Wandle Valley Regional Park visual identity.
- Ensuring the architecture is in context with its surroundings – We find the scale, height and mass of the scheme to be overly dominant given its context. It has a negative impact on the Wandle Valley Conservation Area running through the site and on public enjoyment of the Wandle Trail and there is no evidence presented that the impacts in terms of shadowing and an adverse micro climate will be acceptable. The language presented in the Design and Access Statement of the scheme providing an “*urban marker*” where none is needed; of making an “*elegant contribution to the skyline*” when the reverse is true; and of being “*inspired by a rich history*” when its design and architectural form is alien to the local heritage does not give confidence in the proposals. There is no visual impact assessment provided with which to assess the scheme from key locations. An example of the significant negative impact on the Conservation Area from the key historic destination site at Merton Abbey Mills is below:



5. 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). It is apparent that the proposals do not take all the opportunities available, such as ensuring a positive impact on the Conservation Area and avoiding single aspect flats, and the design relates poorly to its context. The plans should not receive planning consent.

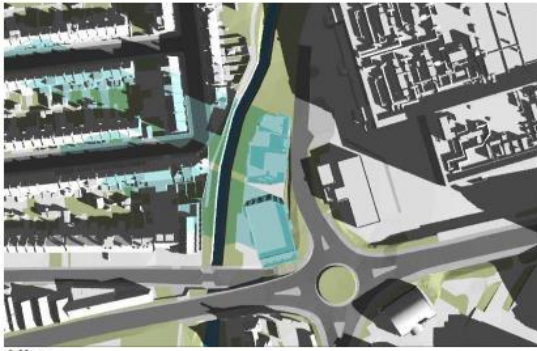
6. Wildlife, landscape and trees - The site also gives rise to important ecological and landscape considerations. It is recognised as supporting foraging bats, water vole and eel among other protected species and is located by the Wandle, a recognised UK Biodiversity Action Plan habitat and designated Site of Importance for Nature Conservation (SINC). Consequently, the Preliminary Ecological Appraisal recommends the provision of an Ecological Enhancement Plan but none is provided. We believe there is insufficient information on which to assess the scheme’s ecological impact or confirm that it will result in biodiversity net gain.

7. The proposed development is recorded as achieving an Urban Greening Factor just 0.05 above the minimum required under the London Plan. This is unacceptably low given its location in the corridor of the Wandle Valley and that the proposals include felling one third (11) of the 34 trees on site. The proposals are supported by a claim that additional planting *“will constitute an improvement in the arboricultural value of the site”* but no i-tree CAVAT assessment is provided to evidence this as required by London Plan Policy G7. A much more ambitious approach to planting and landscaping is required, including improvements beyond the site boundary. This should be accompanied by a planning condition requiring a management plan for a minimum of 10 years rather than the five years proposed because of the importance of the Wandle and the Wandle Trail as key routes.

8. As proposed the scheme includes excessive external lighting with damaging impacts on both visual amenity and ecology (including as an acknowledged feeding corridor for bats). It will be important that the development creates no additional run-off into the Wandle and further measures to enhance the Wandle and Pickle Ditch should be supported which contribute to delivery of the Wandle Catchment Management Plan.

9. The scheme’s assessment of daylight and sunlight does not address its impact on the Wandle which will experience significant shadowing every morning with negative ecological and other impacts:

March 2021



8:00 am



10:00 am



12:00pm



02:00 pm

10. Archaeology - We note that the prior archaeological study found no evidence of remains associated with Merton Priory or the Roman period. Nevertheless, we believe any development proposals needs to be accompanied by a commitment to a full archaeological investigation of the site, delivered through a non-standard planning condition that requires a comprehensive and detailed approach in light of the exceptional significance of Merton Priory and the possible existence of remains. Part of the site lies within the Scheduled Ancient Monument and there is a long history of industrial use along this stretch of the river. There is evidence nearby associated with the archaeological investigations prior to development of the Abbey Wall Works site that the potential archaeology is more significant than might be anticipated even after prior investigation. Opportunities for public involvement in archaeological works and publication of the results should be addressed through an appropriate condition.

11. In conclusion, we object to the planning application on these grounds and would welcome the opportunity to work with the applicant to ensure more appropriate development comes forward for this site.