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By email to:  
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28 September 2020

Dear Sir/Madam,

## **42 STATION ROAD DEVELOPMENT PROJECT, COLLIERS WOOD, LONDON SW19**

The Society welcomes the opportunity to comment on the emerging design concepts for this site at an early stage in the process. Involving the wider public in early discussions admirably follows the line taken in the government's NPPF (para 40), and hopefully will give the scheme architects and others an opportunity to develop their overall thinking.

### **BACKGROUND:**

This site is between the river Wandle and the principal vehicular access to the 'superstore' on its eastern side.

The remains of the principal buildings of Merton Priory lie immediately to the east, under what is currently part of the 'superstore', its car park and the public roadway.

The Priory is defined as a Scheduled Ancient Monument, and its remains indicate that the building was comparable in length, and perhaps influence, to Westminster Abbey or Canterbury Cathedral.

The Chapter House foundations remain open to view in an undercroft below the road, and part of one of the monastic walls can be seen in Station Road.

Additionally, the line of the Roman Stane Street runs some 25m just to the east of the site, and with its river crossing so close to the project, it is likely that historic features will be encountered during any excavations.

The site is therefore not unsurprisingly within the Council's defined Archaeological Priority Zone and adjoins the Wandle Valley Conservation Area. As it is highly likely that any excavation would have the potential to reveal further remains of importance, the Council's Planning Policy DM D4 applies. Any future approval would expect to include suitable Conditions, requiring full and careful archaeological investigation and recording.

It can be seen therefore that this is a site that is within an area that has very significant historical as well as cultural significance for the whole of the Borough.

Additionally, there are Statutorily Listed Buildings nearby (the Priory wall in Station Road, the Wheel House and the Colour House) as well as a number of Locally Listed buildings.

Accordingly, the Society's view is that any development on this site should be shaped and driven by this strong historical context. There is a need to not only reflect it, but to help put right the insensitive indifference that appears to have been evident in earlier planning and design decisions for the wider area.

In the Council's Local Plan the site is within the defined Wandle Valley Regional Park 'buffer' zone, and within the designated Flood zone.

The Wandle river itself is classed as a site of Nature Conservation Importance in the Local Plan.

## THE PROPOSALS:

Housing is being suggested as the predominant use but given the location in the high-risk flood zone, this has to be questioned. In an emergency situation the normal domestic drainage system is not operative for example, causing real problems of sewage ingress to lower floors from flats above.

It would therefore be essential to demonstrate to the Council's satisfaction that when a flooding event occurs (as it will), there are fail-safe physical measures in place that would allow the building and its occupants to continue to function, and be fully protected.

The incorporation of 40% social housing is welcomed: however the sketch proposals suggest that some 28% of the flats could be single aspect.

This is considered to be highly undesirable, and contrary to the low energy, naturally cross-ventilated concept that should now be the norm to meet the Climate Emergency design approach.

Such new buildings should now be designed from the start to fully meet the energy criteria that are needed to achieve the Climate Emergency standards of energy self-sufficiency.

Studies by LETI and others are showing us how this can be approached technically, and current designs which rely on later adaptations and retro-fitting are being seen more and more as outdated thinking. The reference to achieving only 35% above (the current low) standard should not be accepted. This is the kind of project that has the ability to be an exemplar, a model for others to follow.

With the unique location of the site beside the river, is there perhaps an opportunity to utilise the latent heat in the watercourse via a ground source heat pump?

The retrofitting of PV panels to the roofs of the existing terraced houses to the west of the site seems to be a likely future energy option. It follows that new development should not cause a shadowing of those adjoining roofs, as this would limit their ability to generate. This is particularly critical in the colder winter months, where the sun angle is low, and the daylength is short.

This could therefore significantly influence and limit the height of any new development.

The suggested heights of eight and fourteen storeys seem to be excessive and are considered to be quite unsuited to the area character and are out of scale. The density matrix set out in the London Plan would indicate that such a large building mass would be significantly over-density.

A public footbridge crossing of the river is being suggested, and this could be a welcome and positive benefit. However, rather than being just a narrow pedestrian and cycle link, is there an opportunity to reserve a 'corridor' across the site, that would allow the full width of Dane Road to be extended eastwards in the future, cross the river, and link up to any future development of the current 'superstore' site?

(The future potential for the redevelopment of the whole 'superstore' site is – in the present re-calibration of shopping habits by major stores – not something to be ignored. Indeed, if this were to take place, there would be the opportunity to open out and display the foundations of the Priory).

Green-ness and nature are already present and centred on the river and its banks. Retaining all the vegetation and trees (some of which might not be thought of as high quality by purists) should be important.

The present character is quite 'closed-in' and natural, with the strong stream noise giving a special feel, and a welcome contrast to the hard-edged urbanism and traffic that is nearby.

This raises an interesting design question: should not this wildness and natural diversity be maintained and reinforced, rather than going for a more cultured and manicured 'landscape' approach?

Is there an opportunity here for the building itself to be an integral part of this green-ness? Many new buildings have little to relate to in their immediate area, and as a result they “could be anywhere”. But with the river and its strong natural green corridor, is there a case for the building to perhaps incorporate living walls? With each flat enjoying its own private indoor/outdoor green balcony?

This is a site that has the opportunity to root itself in the strong historical and cultural (and natural green) traditions of the area and create a memorable design. The Society looks forward to seeing how the future scheme will evolve.

Yours Faithfully

Chris Goodair,  
Chairman, Wimbledon Society Planning and Environment Committee

cc: LBM Development Control Team & LBM Future Merton Team