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Dear Sir / Madam,

**Local Plan 2020 – Stage 2 Consultation Draft  
Representations on behalf of the Cowell Group  
Abbey Wall Works, Station Road, SW19**

We write on behalf of the Cowell Group to make representations on the draft Local Plan in relation to the site at Abbey Wall Works on Station Road. A site location plan is included with this letter. We consider that the site is suitable for residential development and that it should be allocated in the Local Plan.

**Site description**

The site is approximately 0.2 hectares.

It is located in South Wimbledon, within walking distance of the underground station. South Wimbledon is proposed to form a new Local Centre in the draft Local Plan. Colliers Wood District Centre is less than 4 minutes' walk away.

The site comprises a collection of one to two storey shed buildings accommodating a hand car wash, car repair and MOT garage and workshops. The buildings are in poor quality, are dated, and are not worthy of retention. The site is not in a designated employment area.



The site is immediately north of Merantun Way (A24). The River Wandle runs south to north to the east. A little further to the east is a collection of large 'out-of-town' retail outlets including Currys PC World, Argos, Sainsbury, a Burger King restaurant and a Premier Inn hotel. To the south of the site, across Merantun Way is the Merton Abbey Mills and Wandle Heritage Centre and a large industrial estate. Across Station Road to the north are a terrace of two-storey houses, with a development site located to the north east at 40 Station Road where a scheme of nine residential units is under construction. Further to the north and north-west lies the High Path housing estate which is subject to a recent resolution to grant outline planning permission for redevelopment with a significant increase in density in buildings of up to ten storeys; albeit there are also three existing twelve storey residential tower blocks. Immediately to the west is a car wash and Pentecostal church housed in a former light-industrial / warehouse building, where a new school of five storeys is to be built after securing a resolution to grant planning permission in November 2018.

The site is located in the Wandle Area Conservation Area. The northern boundary of the site is formed by the Grade II listed Abbey Wall. There are two Grade II listed lampposts on Station Road. The site is in an archaeological priority area and it is adjacent to the Merton Priory which is a Scheduled Ancient Monument.

The site is less than ten minutes' walk from South Wimbledon tube station and Merton High Street which is served by a number of bus routes. The site has a Public Transport Accessibility Level (PTAL) rating of predominantly 3 to 4 (where 1 is poor and 6 is excellent). Public transport accessibility improvements indicate that PTAL levels are forecast to improve in the local area, with the site being around 300m from areas with a PTAL of 6a and the new High Path masterplan bringing forward increased local connectivity by creating a new street network. Station Road is a designated cycle and pedestrian route. There is a cycle route on Merantun Way. TfL has recently consulted on the Sutton link (a tram or rapid bus network) with one option proposing a route due south from South Wimbledon station.

Approximately 70 metres west from the corner of the site is a junction between Merantun Way and High Path / Station Road.

The site is in flood zone 1 (with very little risk of flooding).

The site is within the Wandle Valley Regional Park 400m buffer zone.

The site is also located within an Air Quality Management Area.

### Planning History

Planning history in the last five years for the site is limited to an application for advertisement consent. Listed Building Consent was granted in 2005 for repair to the listed Abbey Wall (ref. 05/P2007). Listed building consent was granted in 1987 for “alterations to the listed Priory Wall” (ref87/P1335). Planning permissions were granted in 2003 for “extensions to factory” (ref. M/M7183, M/M9205, M/M8455A).

Listed building consent was granted in May 2018 for works to the listed wall to create a new opening from Station Road to Merantun Way (at the eastern end of the site), and to facilitate improvements including new surfacing and widening of the roadway between Station Road and Merantun Way Cycle Paths.

A planning application for 40 Station Road (opposite) for the demolition of an existing retail warehouse and the construction of nine residential units including two, four-bed houses and a part two, part three storey block of flats was granted planning permission in 2015 (ref. 15/P1156). The redevelopment works are currently underway and are likely to be completed in Spring 2019.

LBM has resolved to grant outline planning permission for the High Path Estate for the comprehensive phased regeneration of the estate which will involve the demolition of all existing buildings and the erection of new buildings ranging from one to a maximum of ten storeys providing up to 1,570 residential units and the provision of up to 9,900 sqm of commercial and community floorspace. (ref 17/P1721). In addition, full planning permission was granted in 2017 for ‘High Path Phase 1’ for 134 residential units in buildings of 3 to nine storeys (ref. 16/P378).

LBM has also recently, in November 2018, resolved to grant planning permission (ref: 18/P1921) for a five storey building to be home to a new secondary school (a Harris Academy) on land between High Path and Merantun Way.

### **Principle of Loss of Employment Use**

The site is not located in an allocated employment area (either in an office location or in an industrial location). Whilst there is a designated industrial area to the south across from Merantun Way, this is distinctly separate from the site. The site is more closely related with the residential areas to the north and east, particularly as it is accessed from Station Road where terraced housing sit on the northern side of the street. The existing employment uses on the site share the use of Station Road with these residential properties, and this creates a conflicting relationship as the existing uses cause transport and highways impacts. The site is therefore not suited for continued employment use – it presents a ‘bad neighbour’ use, with highways, parking and noise nuisance.

The site is also constrained in terms of its shape and configuration, with the listed Priory Wall along its northern edge. The buildings are dated, and there is inadequate provision for on-site parking, loading facilities or servicing arrangements. Station Road is a narrow street which is not considered suitable for large commercial vehicles that would ordinarily serve employment spaces. This re-affirms the position that the site is not suitable for continued employment use.

Policy EC7.1 of the draft Local Plan resists the loss of employment floorspace including 'scattered' employment sites. Policy E7D of the draft London Plan also supports the retention of non-designated industrial sites except where there is no reasonable prospect of the site being used for that purpose.

As noted previously in this letter the great majority of uses on the site are for car washing and car repairs. Whilst it is undeniable that these uses provide employment it is questionable how much they fulfil the aims of the policies. For example, a car wash is a Sui Generis use that has little economic benefit beyond its own use. We note that there is an alternative car wash immediately adjacent to the site and that there are at least a dozen other car repair garages within a mile of the site. For these reasons the benefits (set out below) of allocating the site for a wholly residential use outweigh the retention of the existing use.

## **Residential Use**

The need for housing in the Borough and London as a whole is expressed strongly in the adopted and emerging national, regional and local policy framework. The adopted London Plan sets out a minimum housing target for Merton of 4,107 new homes between 2015 and 2025 (or 411 per year). The draft London Plan significantly increases that target to 13,280 new homes between 2019/20 and 2028/29 (or 1,328 per year).

The strongly residential nature of the surrounding area (the terraced houses opposite and beyond along Abbey Road, and the regeneration and intensification of residential use on the High Path Estate) confirm that this site would be ideally suited for residential use. Its proximity to public transport links demonstrated by the high public transport accessibility in the area, and to local amenities also supports a residential use on the site. Local amenities include (inter alia):

- Merton Abbey Primary School on High Path, within 6 minutes' walk;
- The proposed new Secondary School on High Path, within 2 minutes' walk;
- Retail and employment opportunities on Merton High Street and Morden Road, which will be intensified significantly through the regeneration of High Path, as acknowledged by the draft Local Plans proposal to create a new Local Centre in South Wimbledon (within 8 minutes' walk);
- Retail and employment opportunities around Colliers Wood District Centre (less than 4 minutes' walk);
- Sainsbury's supermarket within 4 minutes' walk;

- The River Wandle, and other open spaces in the area, including Nelson Gardens, Abbey Recreation Ground and the new Neighbourhood Park at High Path (all within 10 minutes' walk); and
- Abbey Mills providing restaurant, bars and employment opportunities, within 5 minutes' walk.

The site is sustainably located for housing delivery, and it should therefore be optimised to its fullest potential.

### **Other Matters**

The redevelopment of the site also offers the opportunity to deliver other policy objections including (inter alia):

- Making efficient use of an accessible brownfield site that is in a sustainable location, as discussed in the preceding section. The NPPF promotes the effective use of under-utilised brownfield sites, and the delivery of much needed homes on this site would help the borough to meet its significantly increased housing targets;
- Delivery of affordable housing, subject to viability;
- An improved character for Merantun Way which is a main road, in line with the aspirations of draft Policy N3.5. This would also accord with London Plan and NPPF policies which require good design; and
- Enhancements to the streetscene and public realm along Station Road and Merantun Way, in accordance with the objectives of draft Policy N3.5. This would accord with London Plan and NPPF policies on delivering public realm improvements, including as part of the desire to encourage walking and cycling.

Redevelopment proposals would require consideration of other matters such as heritage, archaeology, air quality, drainage and transport impacts, and these could be adequately addressed through the planning application process.

### **Conclusion**

In conclusion, the site is ideally suited for a residential redevelopment because continued employment use would not be sustainable. The employment use presents a 'bad neighbour' use creating highways, parking and noise impacts; it conflicts with the residential character of Station Road and the area to the north and east. The site presents an excellent opportunity for the delivery of much-needed housing in a sustainable location with excellent access to public transport and local amenities. We therefore hope that the Council will allocate the site for a residential redevelopment in the Local Plan 2020.

We would welcome further discussion with the Council about this excellent opportunity, and we would be grateful for confirmation that this letter of representation has been received. Should you have any questions



regarding its contents please do not hesitate to contact Joe Haines or Samruti Patel at these offices.

Yours faithfully,

Savills