

**Merton Council  
GLA tall buildings update**

# GLA RESPONSE TO STAGE 3 LOCAL PLAN CONSULTATION

## Tall buildings

Policy D12.6 of the draft Plan contains the same definition of what constitutes a tall building as that set out in Policy D9 of the LP2021. This is both recognised and welcomed. As a matter of guidance, we would advise Merton to use a definition which is based on a measurement taken from the ground level to the very top of the building. Assuming a floor to ceiling height of 3m, this would result in an overall height of 21m. To be clear the Mayor would support a definition of 21m from ground level to the very top of the building. This clarity will help to avoid confusion in terms of determining planning applications and in providing guidance to prospective applicants.

To be in general conformity with Policy D9 of the LP2021, the draft Plan should identify specific locations where tall buildings are considered to be acceptable and appropriate/maximum heights should be set out for specific locations. Suitable locations and appropriate heights should be set out clearly in maps. The draft Plan loosely identifies those areas where tall buildings may be appropriate, namely in the borough's town centre locations, such as Colliers Wood, Wimbledon and the Wider Morden Town Centre Area and this goes some way towards meeting the criteria of Policy D9. To be entirely consistent with Policy D9, all that is required is to map these locations or alternatively, to refer to specific town centre boundaries within which tall buildings are considered to be appropriate. This is necessary to ensure that the Plan is clear which sites are subject to which policy provisions and requirements.

In accordance with Policy D9 of the LP2021, Merton is also expected to set out maximum/appropriate building heights in tall building locations. Paragraph 3.9.2 of the LP2021 provides guidance on the process and Merton are advised to follow it.

As currently drafted, the approach is a divergence from the LP2021 and this means that the draft Plan is not in general conformity with the LP2021.

In order to bring the draft Plan into general conformity with the LP2021, the draft Plan:

- Should clearly identify on maps, suitable locations for tall buildings,
- Should not support proposals for tall buildings outside of those locations, and
- Should set out appropriate/or a range of appropriate building heights in specific locations

# MERTON RESPONSE

## 1. Amended policy wording

Definition amended as per GLA suggestion. Highlighting tall buildings are appropriate at:

- Colliers Wood town centre
- Wimbledon town centre
- Morden regeneration zone
- Sites that use a masterplanned approach

### Policy D12.6

#### Tall buildings

~~Tall buildings in the borough are defined as a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey as set out in Policy D9 of the London Plan.~~

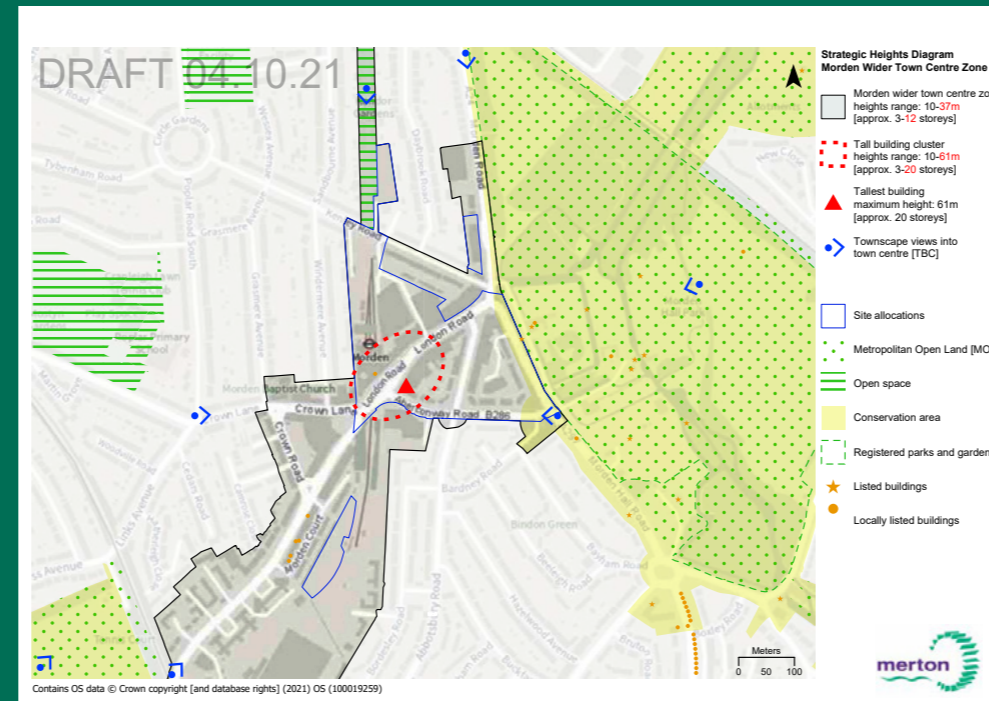
Tall buildings in the borough are defined as a minimum of 21m from the ground level to the very top of the building on the primary street elevation.

In the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and sense of place. They can act as visual markers, such as the redeveloped Britannia Point in Colliers Wood, provide architectural variety, such as Glebe Court in Mitcham, and optimise a sites potential for homes and jobs such as the future of High Path in South Wimbledon. It is crucial that tall buildings are of the highest quality of design and construction.

Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case.

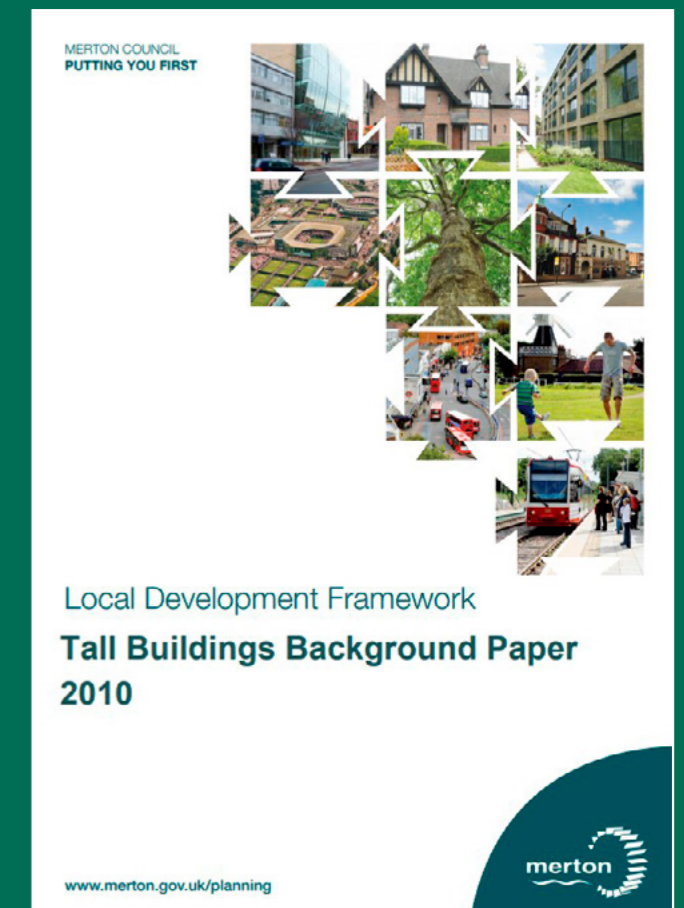
## 2. Town centre heights policy maps

As per GLA suggestion, high level maps indicating a range of heights for town centres in Colliers Wood, Wimbledon and Morden Regeneration zone.



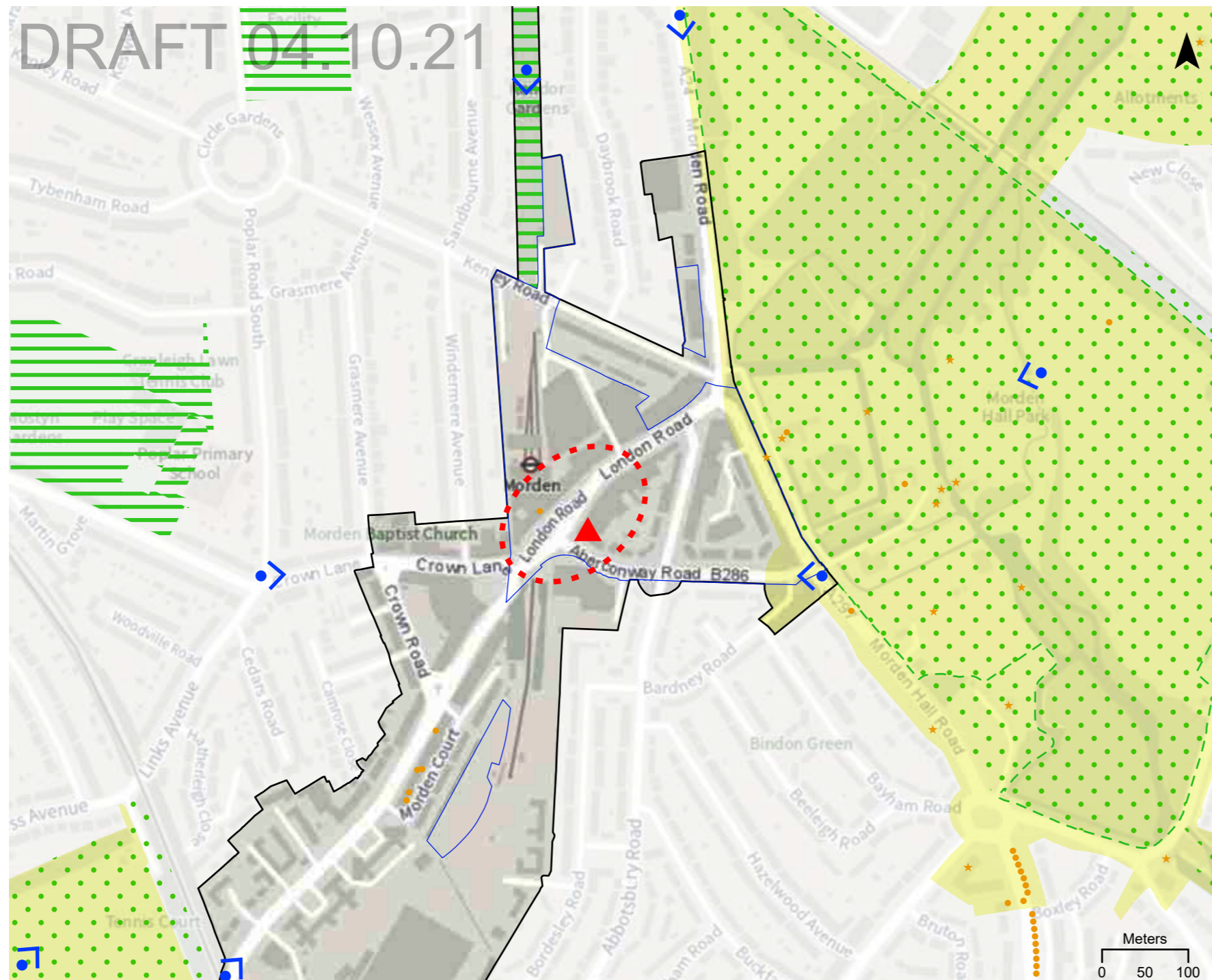
## 3. Updated evidence study

Provides evidence that informs mapping and best practice approach for sites that use a masterplanned approach.



# STRATEGIC HEIGHTS MAP: MORDEN REGEN ZONE

DRAFT 04.10.21



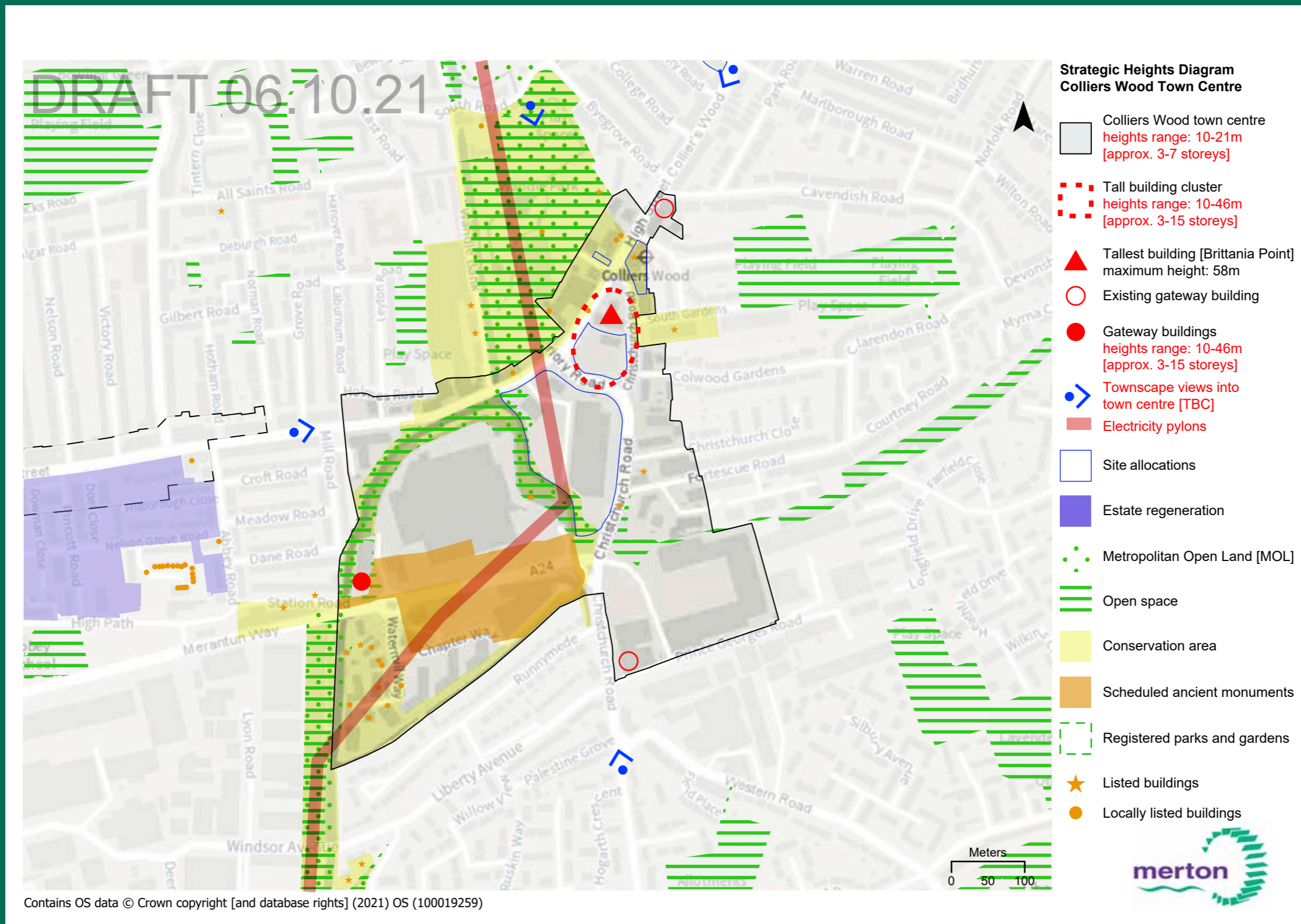
## Strategic Heights Diagram Morden Wider Town Centre Zone

- Morden wider town centre zone  
heights range: 10-37m  
[approx. 3-12 storeys]
- Tall building cluster  
heights range: 10-61m  
[approx. 3-20 storeys]
- Tallest building  
maximum height: 61m  
[approx. 20 storeys]
- Townscape views into town centre [TBC]
- Site allocations
- Metropolitan Open Land [MOL]
- Open space
- Conservation area
- Registered parks and gardens
- Listed buildings
- Locally listed buildings

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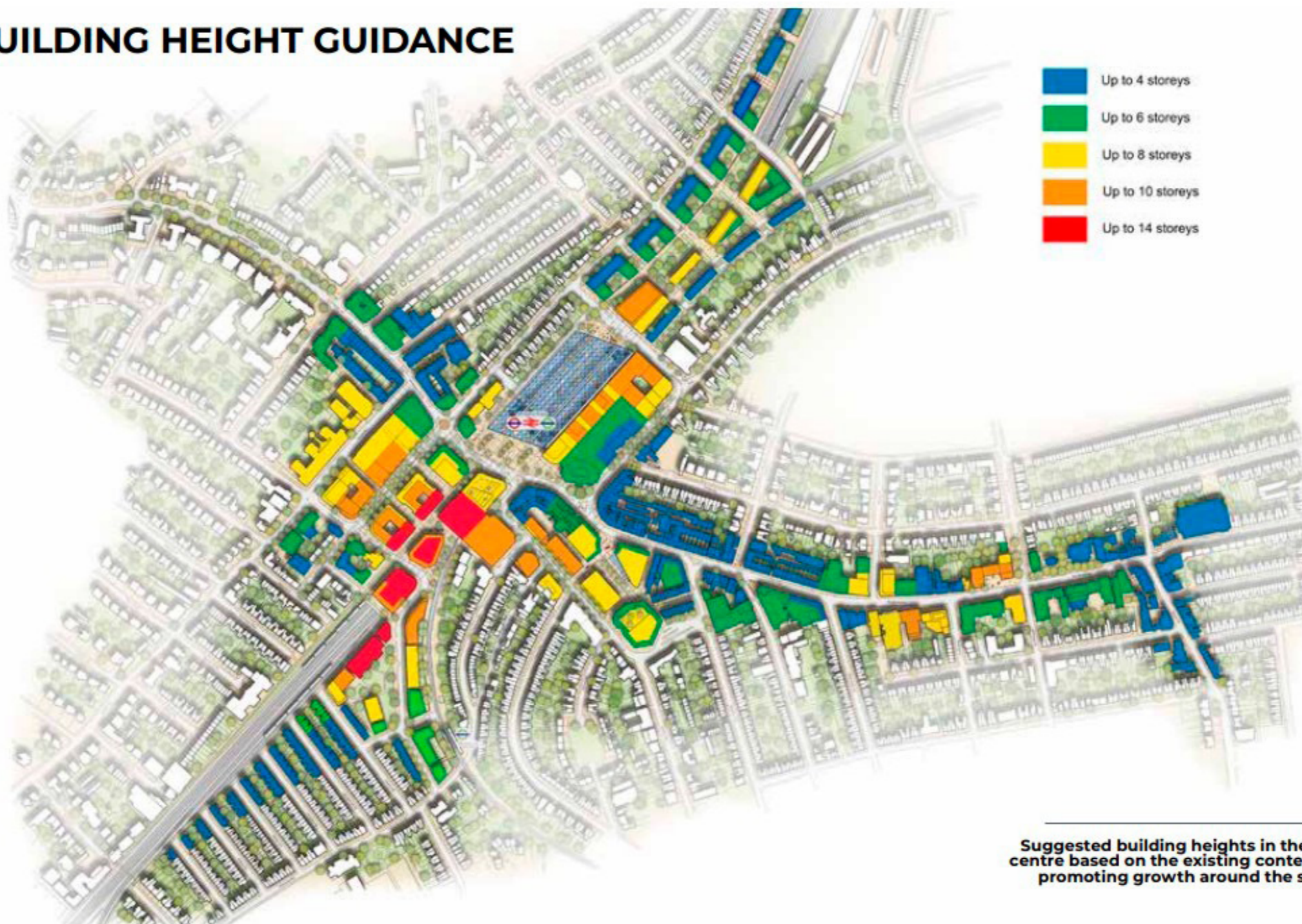


# STRATEGIC HEIGHTS MAP: COLLIERS WOOD



# STRATEGIC HEIGHTS MAP: WIMBLEDON

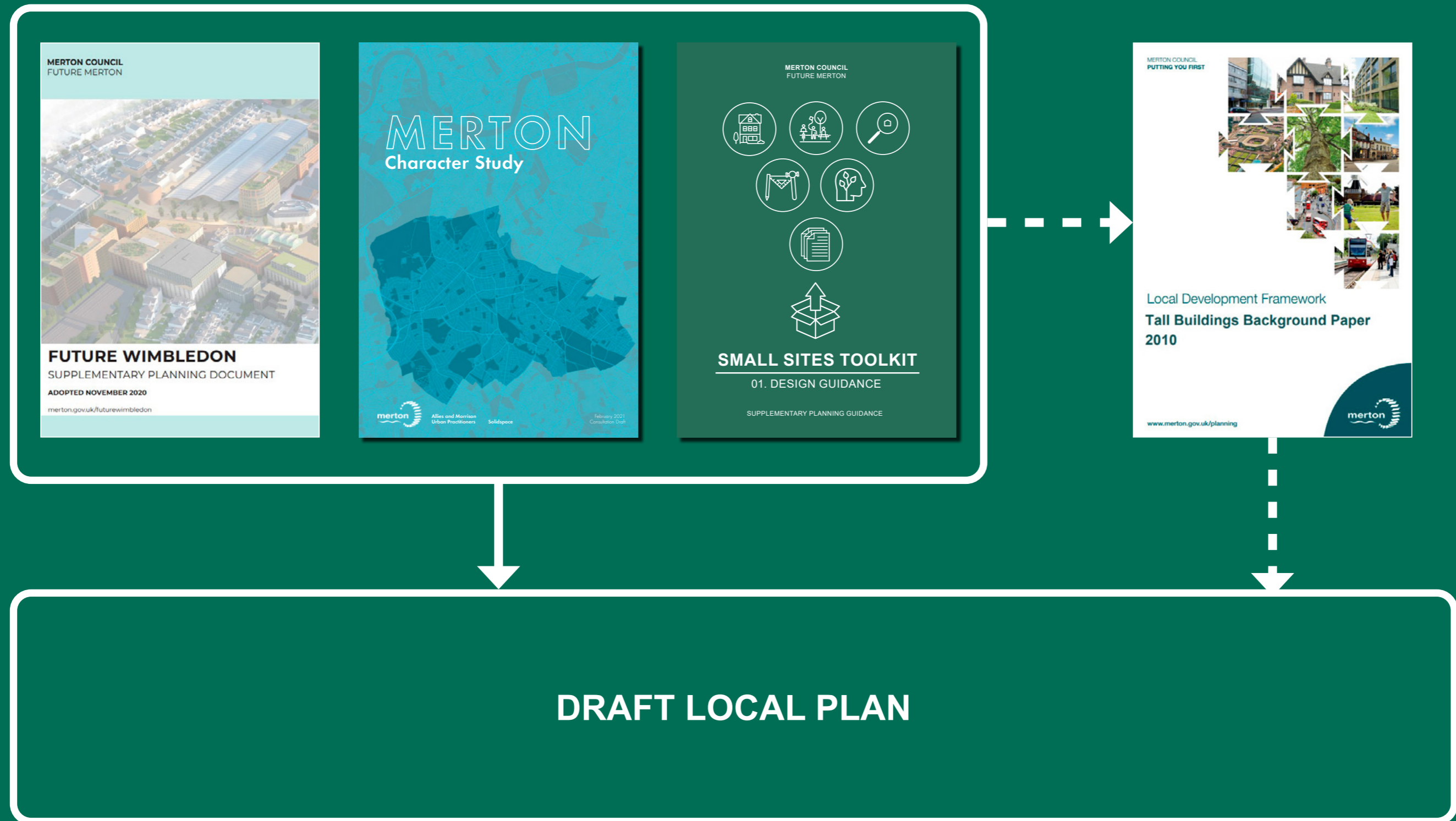
## BUILDING HEIGHT GUIDANCE



Suggested building heights in the town centre based on the existing context and promoting growth around the station

# CURRENT EVIDENCE, GUIDANCE & POLICY

Merton's Tall Buildings Background paper is from 2010 and is not informed by the latest evidence, guidance and policy.



# AN UPDATED TALL BUILDINGS PAPER: DENSITY TOOLKIT

The density toolkit will illustrate good examples of optimising sites, however will focus on taller buildings.

## 1. Borough wide analysis

Building from existing SPD's this section will give an overall analysis of the borough to inform future development.

## 2. Best practice approach

Basic and simple best practice design approaches when designing at higher density using diagrams and precedents.

## 3. Area guidance

Specific guidance on:

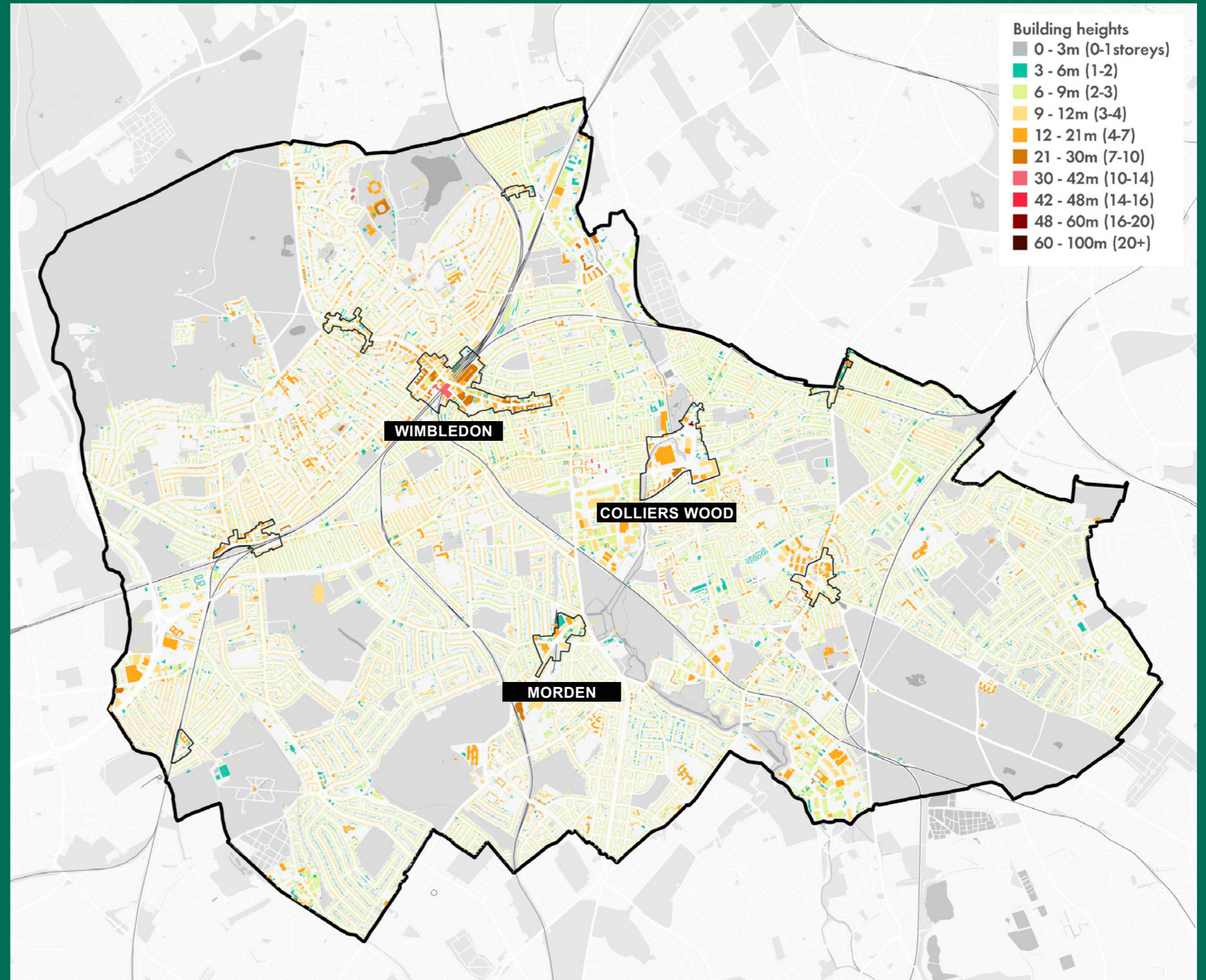
- Wimbledon
- Morden
- Colliers Wood
- Sites suitable for a masterplanned approach





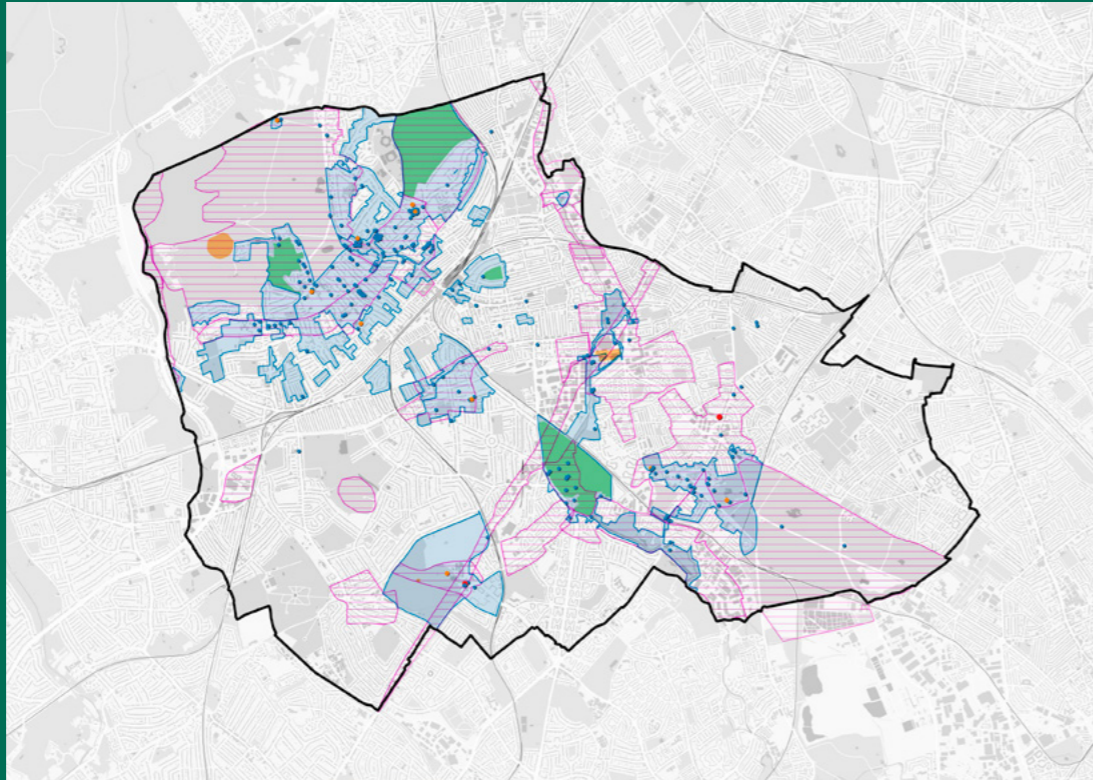
# BUILDING HEIGHTS IN MERTON

Predominately a 2-3 storey borough with taller buildings in Town Centre locations and larger housing schemes

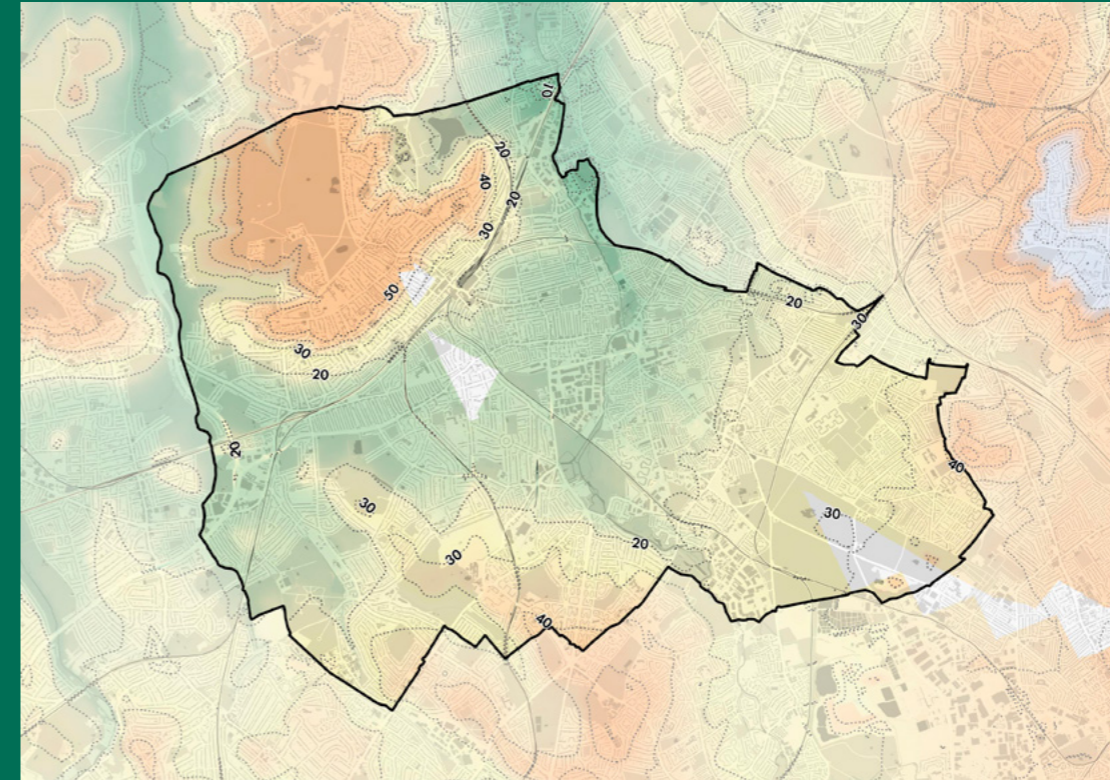


# 1. BOROUGH WIDE ANALYSIS

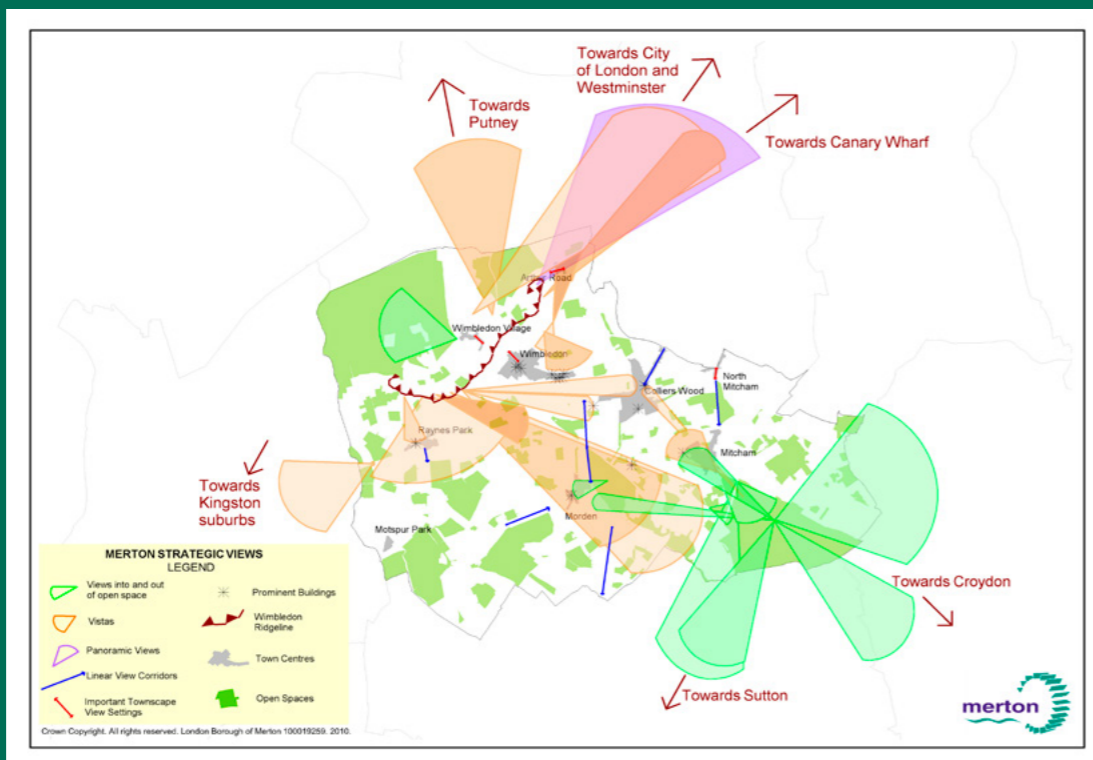
Relevant mappings from across the borough



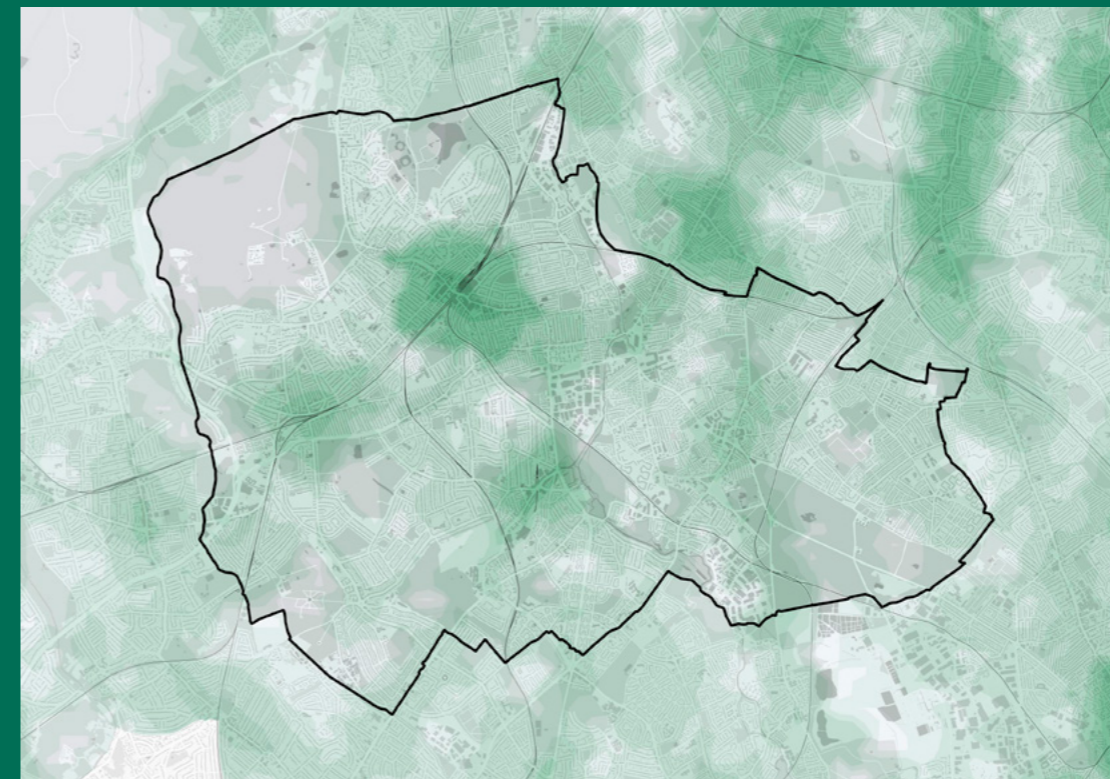
history and heritage



topography



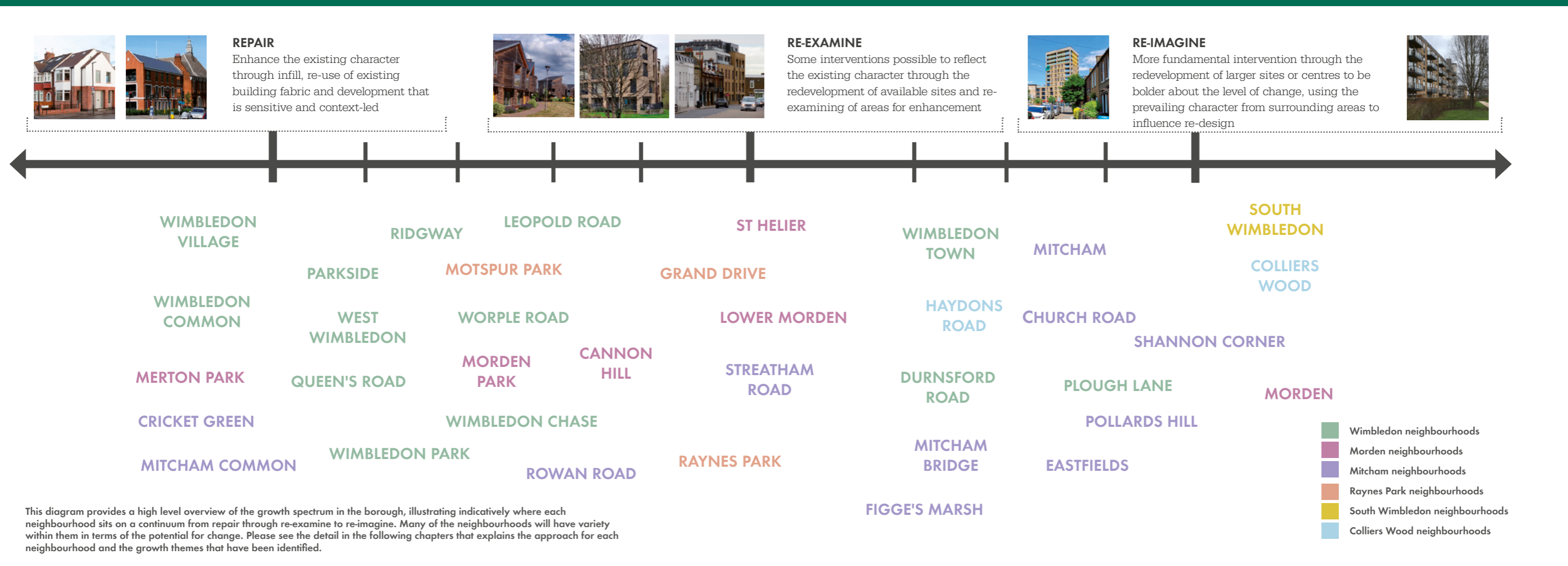
local and significant views



PTAL

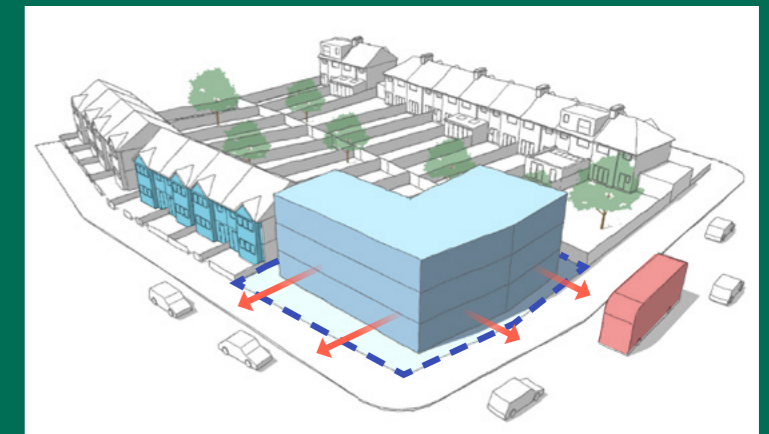
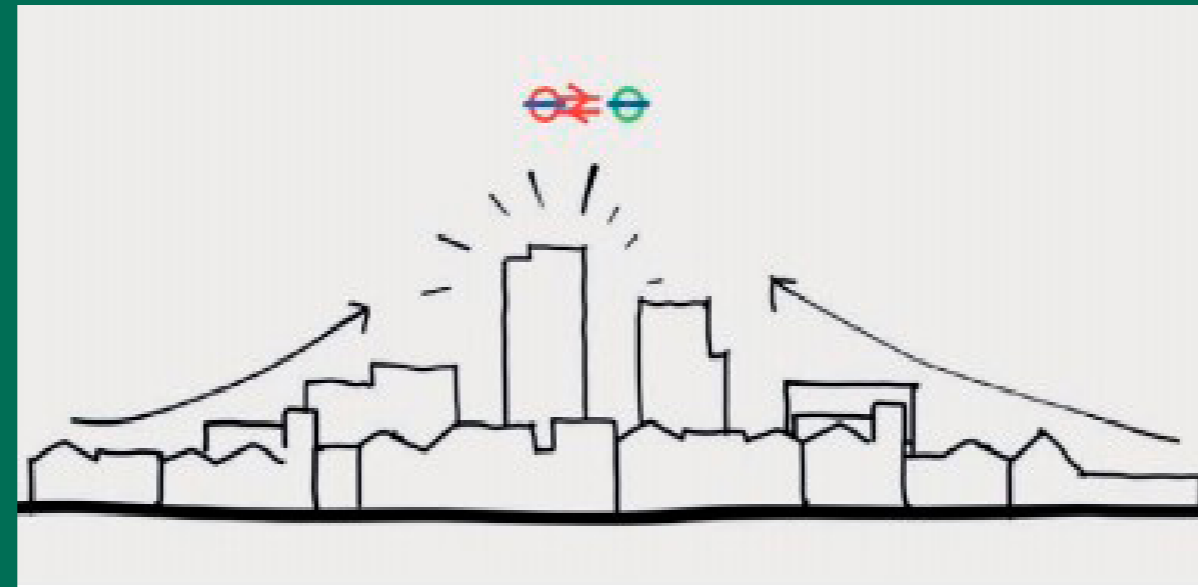
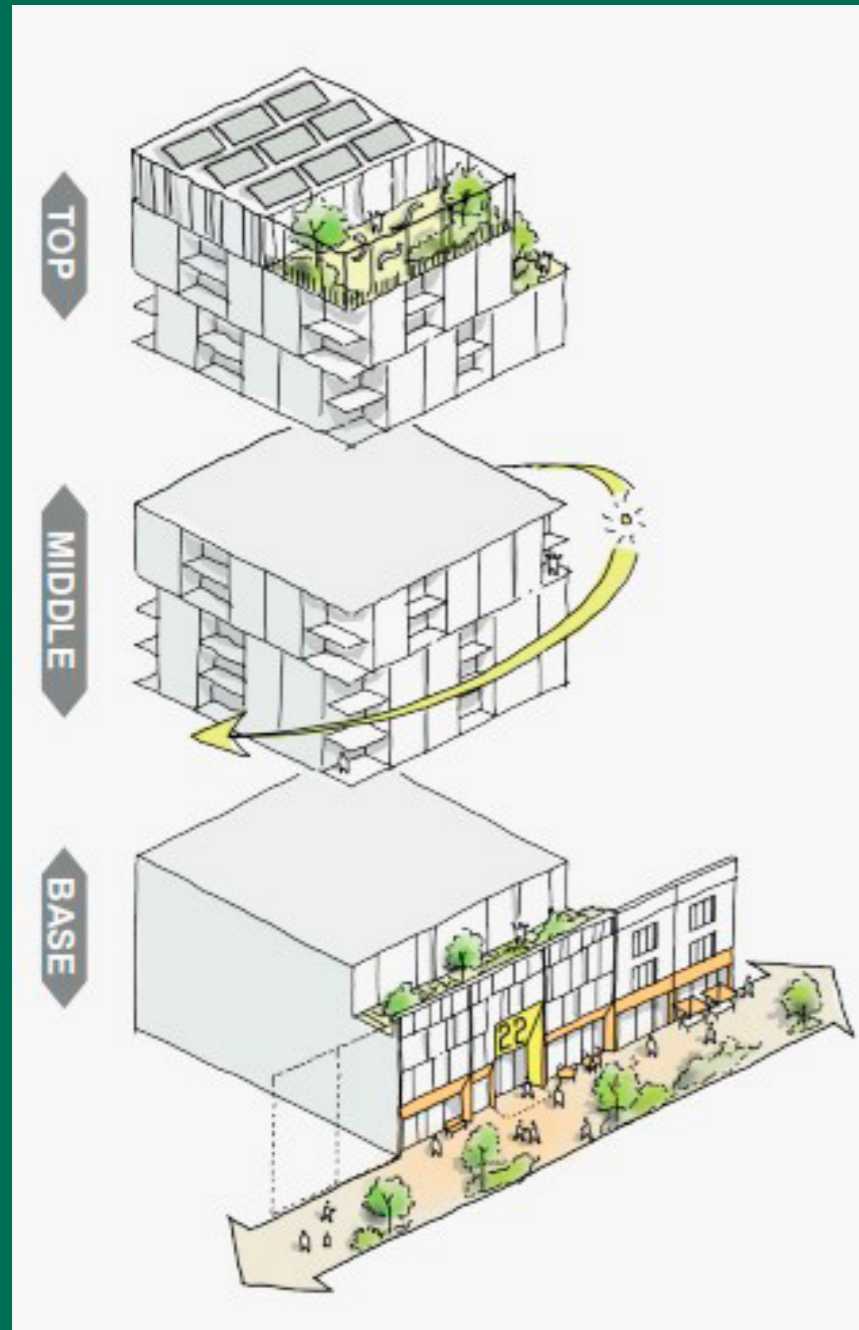
# 1. BOROUGH WIDE ANALYSIS

Adding further detail to other Merton studies



# 2. BEST PRACTICE APPROACH

Simple design advice on how to approach designing tall buildings



# 3. AREA GUIDANCE

Providing a range of heights on appropriate town centre sites as highlighted in Local Plan

Brent Tall Building Strategy - October 2019

## Area A - Wembley Hill Road - Cecil Avenue [Wembley East]

8.9 Heights in this area are currently predominantly a mix of low-rise and mid-rise. About half of the buildings are mid-rise, 5-7 storey in the north west and in the south east 8-9 storeys rising up to the 12-storey Elizabeth House. About a third is low-rise including the 1-3 storey buildings in the north east. The remainder is the cleared development site of the former Ark Elvin academy. The Grade II listed St Josephs Church is adjacent to the south edge of Elizabeth House. Adjacent to the northwest corner a development of 17 and 18 storeys has been permitted, adjacent to the 26 storey Chesterfield House

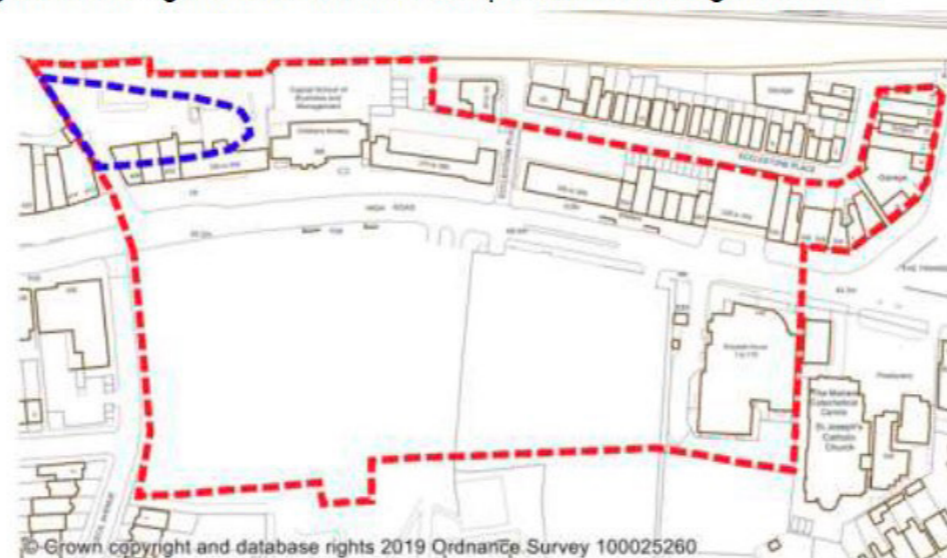
	<i>Character:</i>
Average height	Mixed (2-7 storeys)
Height range	1-12 storeys
Uses	Residential, commercial
Built form	Mixed, High Street
Style / age	Mixed
Conservation	Listed buildings
PTAL	5-6a
Appropriate heights	6-18 storeys (approx. 18-54m)



Wembley AAP - suitability for tall buildings (existing average heights added)

### Strategy:

8.10 The area has development potential for taller buildings than identified in the Wembley AAP within a Tall Building Zone. The majority of new buildings will be anticipated to be mid-rise. Existing permissions/development creates a context for taller buildings towards the north west core. Elsewhere proposals if higher than mid-rise should have regard to the significance of the St Joseph Church heritage asset and matters such as daylight to



Wembley (A) Hill Road Tall Building Zone (Red) and Core (Blue)

# 3. AREA GUIDANCE

On larger sites, a masterplanned approach may be suitable and will be appraised case by case

**A framework for character-led tall buildings**  
Applicants who are considering tall building proposals on their sites should consider the following issues and questions during the pre-app process and in anticipation of submitting their outline or detailed proposals to the Council.

**A - Site selection**  
As part of the initial development appraisal, it is important to review relevant policies and guidance for the site which may set out parameters and constraints for its future development. For example:

- Has the site been allocated by the Council? If so, does the allocation include any guidance regarding building heights or density?
- Has the site been highlighted in the Local Plan, Local Development Framework, Area Action Plan, Supplementary Planning Document or any other policy document which is considered material evidence for evaluating planning applications? If so, what guidance has been provided in relation to building height or density?

**B - Sensitivity issues**  
Some locations are particularly sensitive and, therefore, less suitable to tall building development for a number of reasons, typically regarding the setting of heritage assets or the potential for overbearing visual prominence. Due to these sensitivities, proposals which seek to exceed the prevailing height of surrounding buildings would require a strong urban design rationale for doing so. Applicants may wish to consider mid-rise forms of development (i.e. 2-3 storeys) on sites within low-scale suburban neighbourhoods where tall buildings would be inappropriate.

**C - Suitability**  
Using the overall suitability map as a guide, applicants can assess whether their site is in a more suitable location for tall buildings. Proposals for tall buildings on such sites will be considered providing they are responsive to their surroundings and demonstrate exceptional design quality. Proposals must consider their immediate and local character, townscape and socioeconomic context as well as the natural environment.

**D - The natural environment**  
When considering the natural environment, proposals for tall buildings should aim to:

- Assess whether a site is liable to flooding and ensure that the flood risk may be properly managed and mitigated if it is not prohibitively high.
- Seek to protect and enhance the open quality and amenity of Metropolitan Open Land and other Public Open Spaces including parks, rivers and canals.
- Consider the existing ecosystems and surrounding site and demonstrate how the proximity of tall buildings to biodiverse woodlands or water bodies supporting notable animal species would not negatively impact on their upon their habitats and migration patterns.
- Limit excavation and work with the site topography and limit to exploit prospects and panoramas without impeding local views.

**E - Considering context**  
It is essential for applicants to demonstrate an understanding of the existing social and physical character of an area beyond the red line boundary of the site. Applicants should:

- Undertake a high-level analysis of the surrounding area, taking into account the urban form and character of existing buildings and their prevailing heights.
- Identify the appropriate character theme which has been assigned to the site (on the reinforce-repair-reimagine spectrum) and consider whether this supports the principle of tall building development.
- Identify the borough area and neighbourhood in which the site is located and to demonstrate how their proposals can contribute to the Council's specific objectives or priorities for that area.
- Demonstrate how the proposal aligns with the relevant planning policies and local character to achieve optimised capacity.
- The larger the site, the greater potential impact that its development will have on local character. Tall buildings on large sites should demonstrate their positive contribution to Good Growth.

**F - Urban design principles**  
Having established suitable locations for tall buildings, applicants must ensure that proposals:

- Consider alternative options for equally dense but lower / medium-rise forms of development as part of the design process.
- Present a clear townscape merit and justification for their height which ought to be proportional to their role and function in the immediate and broader context.
- Integrate taller elements within larger blocks with varied massing which can mediate between the scale of proposed developments and existing buildings.
- Seek to retain or improve the cross-sectional profile and character of existing streets.
- Reinforce the spatial hierarchy of the local and wider context by aiding legibility and wayfinding.

Proposals for clusters of tall buildings (i.e. three or more within close proximity) should:

- Be designed with varied heights to provide visual intricacy across the existing skyline.
- Position the apex of building heights closer to the centre and lower building heights towards periphery of the cluster.

**G - Visual impacts**  
Proposals for tall buildings should evidence how they respond sensitively to the local character through visual impact testing of nearby, mid-range and long-distance views. This can be achieved through:

- Zones of Theoretical Visibility Testing (ZTV)
- Accurate Visual Representations (AVR)
- Verified views analysis

These techniques can be used to ensure that tall building proposals have taken local heritage assets and historical settings into account and that no harm is done to the local character of the built environment. Such testing is particularly important within Conservation Areas, near listed buildings and in places where there is heritage at risk. In such areas, the choice of construction method and careful selection of materials, colours and outward appearance is key to ensuring that tall buildings enrich and reinforce rather than work against their historic settings.

**H - Architectural design principles for tall buildings**  
The following key principles should be considered in the design of tall buildings and their management.

**L - Crown**  
This includes the roof and uppermost storeys, provide opportunities for new inflection points in the skyline. The extent to which a tall building's crown is idiosyncratic or sympathetic to the local character should depend on the role of the building in relation to its position and wider context. It is preferable that the upper floors should be articulated and distinct in material and form to the middle. Roof-top telecoms and mechanical equipment (such as plants, BMUs and lift overruns) ought to be integrated and concealed by parapets. While publicly accessible viewing platforms are encouraged, any outdoor amenity spaces must ensure safety for persons at height and street level.

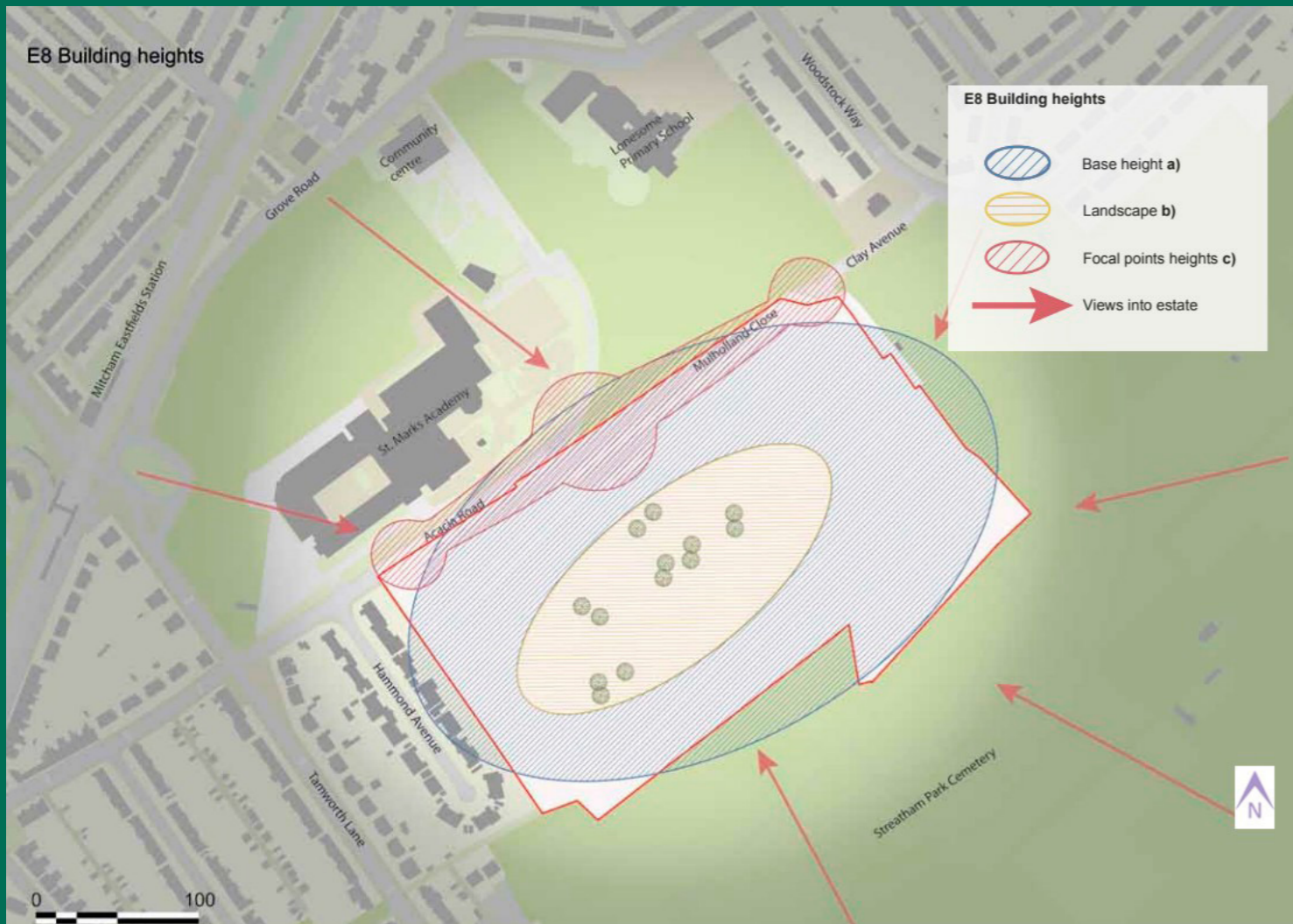
**K - Middle**  
The design of the main building volume should consider the impact on wind flow, privacy, light and overshadowing. The three-dimensional form should balance the internal programmatic requirements with outward elegance and appearance to and from surrounding buildings, streets and spaces. A direct relationship between the typical floor plate(s) and facade composition is desirable - as is the harmonious modulation of elements such as balconies, recesses, and fenestration. The selection of visible materials and lighting ought to reinforce or enhance the townscape, particularly at night-time.

**J - Base**  
The base of a tall building should be animated by active frontages and provide a welcoming arrival experience. Public spaces around the base should be generous, well-designed and contribute positively to the local context. Front of house areas such as entrance lobbies, circulation and shared spaces should be safe and well lit. Communal spaces should be easy to access, inclusive and visible from the surrounding streets. Back of house areas should be well organised and sufficiently large to accommodate essential functions such as bike storage, bin storage, car parking and refuse collection.

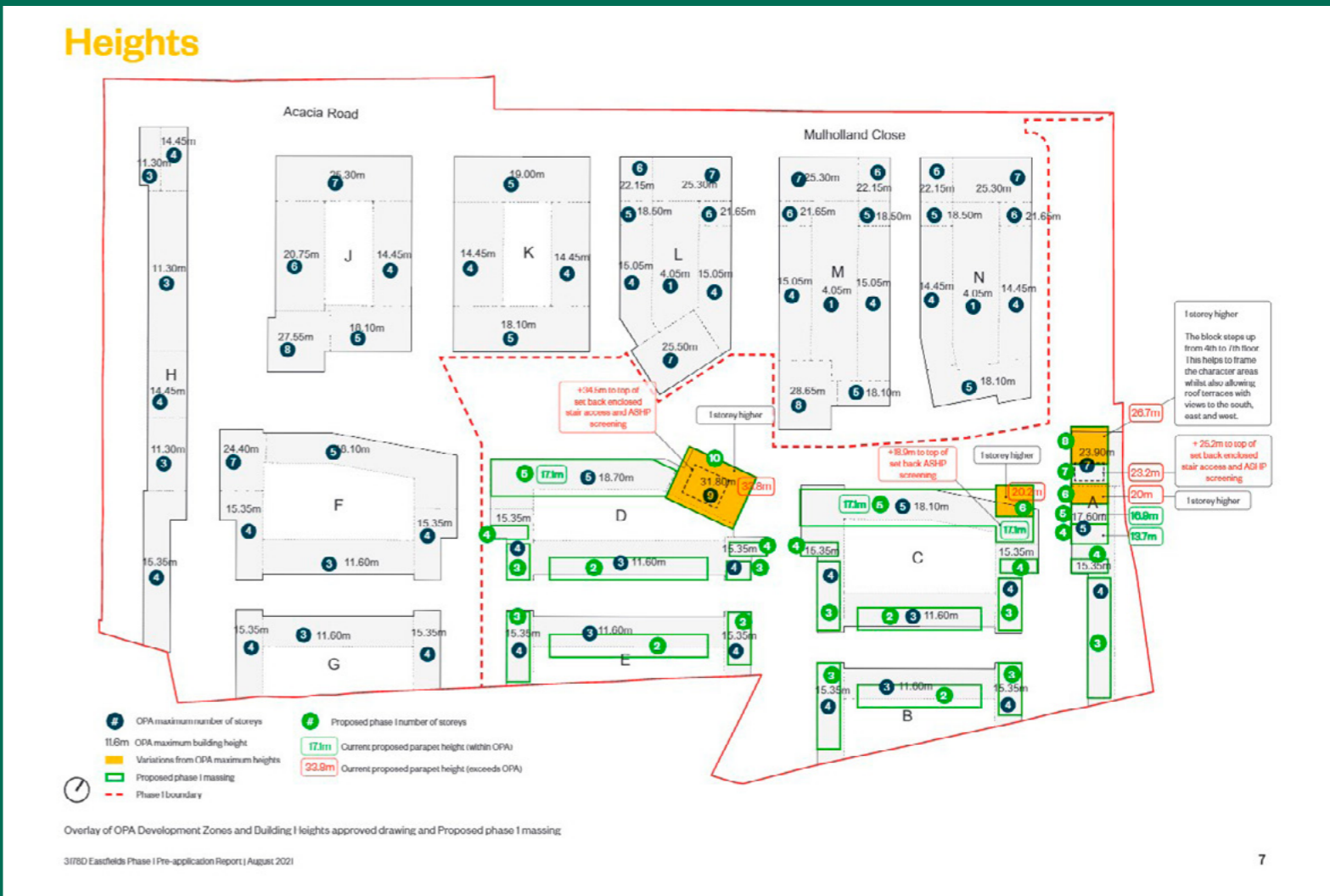
**I - Safety and management**  
Tall buildings benefit from a clear delineation of public and private space. Defensible spaces and active, street-facing frontages at ground floor can provide a sense of enclosure and safety. The security and management regime of communal areas should ensure that the operational use of the building follows best practice. Well-defined evacuation strategies will minimise the impact of fire, flooding and other situational hazards.

CHARACTER EVOLUTION





estates local plan 2017



pre-app 2021