



Historic England

## **Examination of the Merton Local Plan**

### **Matter 13: Tall Buildings**

#### **Historic England, Hearing Statement**

**17/05/2022**

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

# Historic England Hearing Statement

## Introduction

- 1.1 This statement addresses the Inspector's questions with regards Matter 13, Tall Buildings.
- 1.2 Many of the issues raised in relation to Matter 13 are addressed in our Regulation 18 (stage 2a) response. To avoid repetition and for ease of reference we have appended the relevant extracts from that response to this Hearing Statement.
- 1.3 This statement is 2472 words excluding Appendix 1.

## **Inspector's Questions Matter 13:**

**Is the Plan's approach to tall buildings grounded in an understanding and evaluation of each area's defining characteristics, in general conformity with the London Plan, and are the Plan's policies relating to tall buildings effective?**

**Issue (i): Is the Plan in general conformity with Policy D9 of the London Plan insofar as the approach to Tall Buildings is concerned?**

**Q1. Does the development plan define what is considered a tall building for specific localities; and is the plan clear and consistent in its terminology relating to 'tall', 'taller' and 'mid-rise' buildings?**

- 2.1 The terms "tall", "taller", and "mid-rise" all appear within the plan, but it is unclear if this is intentional. There is certainly a definition for a tall building provided in policy D12.6, but no definition is provided for "taller" or mid-rise", although the Merton Borough Character Study (MBCS) describes mid-rise as being between 3-5 storeys<sup>1</sup>. There is no evidence to show how the plan's definition of a tall building (being over 21m) has been arrived at which is contrary to the London Plan policy D9's (LPD9) requirement to take a context-based approach to the definition. At this stage in the plan-making process a solution would be to use the London Plan definition of a tall building i.e. those substantially taller than their surroundings and cause a significant change to the skyline, and not less than 18m.
- 2.2 Notwithstanding the issues mentioned above, D12.6 (as modified) has been improved by making it clear that tall buildings will *only be acceptable* in the locations defined which brings it more in line with LPD9 (part B.3).

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<sup>1</sup> Examination reference 12D1: Merton Borough Character Study (2021) pp.133

**Q2. Is it clear where in the Borough that tall buildings may be and has the process for defining such areas included engagement with neighbouring boroughs that may be affected?**

- 2.3 Part 1 of policy D12.6 (as modified March 2022), provides more clarity than was seen in the previous two versions of the plan (it is worth noting that the Regulation 19 version was more ambiguous than the Regulation 18 (stage 2a) version of the plan). D12.6 Part 1 does this by referring back to the relevant place-specific chapters, site allocations, and newly introduced Strategic Height Diagrams. The issue is that these i.e. the diagrams, place-chapters etc. themselves are not clear and thus, by extension and for all practicable purposes, D12.6 remains unclear. For instance, the allocations remain vague with wording such as “the site *could* include *taller* buildings” appearing throughout the plan; the Strategic Height Diagrams show “bubbles” rather than site boundaries; these parts of the plan inconsistently indicate what heights will be acceptable in the corresponding allocation policies and in many cases do not provide height parameters at all; and all of the locations lack adequate evidence to show how heritage has been taken into account or how a design-led approach (as per London Plan policy D3) has been taken to developing the policies.
- 2.4 The allocations also state that they are subject to consideration on character, heritage, and townscape, which undermines the plan-led, design-based approach required by the London Plan<sup>2</sup>. It is of course necessary to defer more detailed matters to application stage, but issues such as location, scale, quantum, massing, and key requirements, such as mitigation measures and particular heritage sensitivities, should be defined at plan-making stage to ensure that subsequent applications can be dealt with quickly and easily, and to deliver a genuinely plan-led approach.
- 2.5 The modified plan introduces Strategic Height diagrams, but it is unclear whether they reflect the map shown on pp. 430 of the plan (modified March 2022).

**Q3. How would proposed MMs seek to achieve conformity with the London Plan and effectiveness in these regards?**

- 2.6 The March 2022 modifications provide some additional clarity as to where tall buildings can go by outlining broad locations across various Strategic Height Diagrams. However, as discussed above integral issues remain. While additional clarity is welcome, and goes some way to improving conformity with LPD9, it remains the case that no evidence has been provided to indicate how

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<sup>2</sup> See London Plan policies GG2 part D; D1; and D3.

these heights were determined or to show that the full impacts of such heights upon heritage have been understood.

- 2.7 The criteria set within D12.6 parts B and C are generally appropriate and reflect the London Plan in many respects. However more would be needed to bring the policy in line with LPD9 part C.d by requiring proposals resulting in harm to demonstrate that alternatives have been explored. This could be overcome by expanding D12.6 Part 3 to include additional wording requiring this information to be submitted. This could be done through a further modification.

**Issue (ii): Is the Plan's approach to tall buildings based on local context and grounded in an understanding and evaluation of each area's defining characteristics?**

**Q1: Are locations and appropriate building heights for tall buildings clearly identified on maps; and are proposed MMs which would bring about the inclusion of strategic heights diagrams justified and underpinned by relevant evidence, such as the Borough's ongoing Character Study, the findings of any relevant conservation area appraisals, or the implications of the heritage assets identified as being "at risk" (e.g Upper Morden Conservation Area)?**

- 2.8 The plan as modified introduces the Strategic Height Diagrams, but there is inadequate evidence to underpin these and the allocations. The Merton Borough Character Study (MBCS) is borough-wide and provides a helpful baseline in terms of characterisation and in identifying where particular sensitivities lie. However, it contains limited site-specific assessment and draws limited findings. The approach to tall buildings taken within the MBCS is also high-level and is conceptual rather than specific to Merton. We would not necessarily expect a character study to provide a detailed level of assessment. Sometimes it is an issue of how Council's decide to label these things, but generally a character study exactly that, a statement of baseline character that forms a starting point for further assessment, much in the way a Statement of Significance would be. They would be used to identify broad areas of search as to where tall buildings may be appropriate, followed by more detailed assessment to determine scale, height parameters, development requirements etc. the scope of which would be proportionate to any sensitivities there may be.
- 2.9 The Borough's Conservation Area Appraisals (CAAs) are part of the evidence base, but we have not seen evidence to demonstrate that these have been reviewed or analysed to support the suitability of the allocations, locations for tall buildings, or to inform and site-specific criteria/requirements.
- 2.10 The policies to support tall building development in Morden are the only policies to benefit from additional assessment. The evidence published in respect of

Morden consists of the Morden Town Centre Heritage Review (2020), and Townscape and Visual Assessment of the Hawkins\Brown Strategic Development Framework. While helpful these documents are limited in scope and detail and are not adequate to support the plan proposals. We provided specific comments in our Regulation 18 response as to why we were concerned about the methodology used and the findings which were drawn from these studies.

**Q2. Is there any specific evidence to justify tall buildings sites allocated in the Plan, and are policies clear as to the scale of building likely to be acceptable on such sites?**

- 2.11 As discussed in the questions above, the evidence to justify the tall building sites allocated in the plan is inadequate, and key details such as the likely scale of development acceptable are lacking. This will result in ambiguity for applicants, decision-makers, and the public. A review of the evidence base would be helpful in drawing out particular issues, sensitivities, risks, opportunities, and vulnerabilities that could be used to add more detail to the site-specific policies. This would help set a positive strategy for the historic environment.
- 2.12 The policies lack detail as to what scale of development is likely to be acceptable on allocated sites and do not consistently provide height parameters. It is important also that heights are expressed in metres and not storey heights, as this causes further ambiguity. More detail is needed for clarity and for tall buildings to be genuinely plan-led.

**Q4. Have the associated assumptions for tall buildings as part of Site Allocation CW2 been informed by consideration of the potential effects on the historic environment, including Merton Park, Wandle Valley, Wandle Park and the experience of the Wandle Trail?**

- 2.13 These open spaces and parks could be considered non-designated heritage assets, and they do appear on the London Garden Trust's Inventory of historic green spaces<sup>3</sup>. While they do not benefit from national designation, they do form clusters of important landscapes and places that contribute positively to the wider character, appearance, and experience of the borough. The policy for site allocation CW2 would be improved by including an additional requirement for development to have regard to these non-designated heritage assets. Merton's Heritage Strategy 2021-2025 does not form part of the plan's evidence base yet is a very helpful. The allocation policy could make reference to this document, which provides a good deal of information on these open spaces, so that it hooks together with the plan. The Heritage Strategy would provide a

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<sup>3</sup> The London Gardens Trust: Inventory for Merton  
<https://londongardenstrust.org/conservation/inventory/sites-in-borough/?Borough=Merton>

useful source of information for applicants. These points could be addressed through modifications help provide a positive strategy for the historic environment.

**Q5. Have the associated assumptions on densities and heights of buildings relating to Wimbledon sites Wi9, Wi10, Wi13 and Wi15 been informed by a consideration of potential impacts to the significance of designated heritage assets?**

- 2.14 Please see answers to Issue 2 above. In summary, there is baseline evidence, but an analysis of this is missing and therefore there are minimal findings or recommendations relating to the historic environment that would be used to inform policies. Such analysis would identify the potential impacts upon the historic environment and demonstrate an understanding of the likely effects of the policies.

**Q8. Proposed MMs to the Plan would see the Mi1 Benedict Wharf, Mi16 Mitcham Gasworks, and RP3 Burlington Road as sites suitable for Tall Buildings, with indicative sizes of up to 10, 9 and 9 storeys respectively – what is the justification for the proposed MMs, and what evidence has informed an assessment of the sites' suitability for tall buildings and the recommended maxima in terms of storey heights?**

- 2.15 As discussed in our answers to Issue 2 above, we do not consider that the policies provide enough detail. The evidence is inadequate to demonstrate an understanding of the impacts or to identify any specific criteria, determine appropriate heights, or identify mitigation measures that may be needed.

**Issue (iii): Are the Plan's policies relating to tall buildings effective?**

**Q3. Will Policy D12.6 be effective in managing tall buildings in a way which is sympathetic to the character and urban grain of the Borough?**

- 2.16 Policy D12.6 is broadly appropriate (with the exception of some minor improvements suggested in paragraph 2.6). However, as mentioned above, it is the site-specific elements it defers to that render it ineffective in practice.

**Q4. Is Policy D12.6 clearly written and unambiguous so that it is evident how a decision maker should react to development proposals?**

- 2.17 As above, the site-specific elements the policies defer to are ambiguous and do not provide clear direction as to how decision-makers should respond.

**Q5. Do the criteria contained within the policy provide sufficient detail for managing proposals for tall buildings within the areas identified so as to be reasonable, justified and effective?**

- 2.18 The criteria in the plan for specific site allocations are high-level and lack specific detail. The production of adequate evidence would have provided findings that could be transposed into the relevant policies therefore providing the necessary level of detail to guide the delivery of good quality, sustainable development.

**Q8. Are the site allocation policies sufficiently clear as to whether tall and “taller” buildings will be acceptable?**

- 2.19 Please see paragraphs 2.3 and 2.4 above.

**Conclusion**

- 3.1 Historic England has raised concerns regarding the plan’s approach to tall buildings and the evidence to underpin it since Regulation 18 stage. In summary, we consider that focusing tall buildings within the three town centres is an appropriate strategy for the borough, and that the standalone development policies in the plan are largely appropriate. It is the evidence and detail to support the finer grain aspects of the plan which are problematic and could undermine the strategic vision and spatial objectives of the plan.
- 3.2 The lack of almost any evidence to support the site allocations means that the plan is not justified, effective, compliant with the London Plan, and it would not set a positive strategy for the conservation of the historic environment. It is therefore unsound. That said we do not feel that the evidence needed to provide the additional detail required for the site allocation policies would require significant amounts of work. The plan’s soundness would also be improved through modifications.
- 3.3 A lot of the baseline information is present, it is a case of reviewing this information and providing an analysis of it, then using those findings to inform the policies. The main sensitivities that would require more direction and detail at plan-making stage principally lie around the borough’s Registered Parks and Gardens, their setting, and the individual assets within these. These types of assets are particularly vulnerable to the impacts of tall buildings due to the important contribution that setting often makes to their significance and how they are experienced. In the absence of testing and assessment to inform policy criteria, the impacts that the plan may have upon the historic environment cannot be said to be adequately understood. Archaeology should be better represented throughout the plan, but that can be overcome with wording through modifications if that is considered appropriate by the Inspectors, in any case archaeology is not an element of these Stage 1 Hearings.
- 3.4 A proportionate approach, at this late stage, would be to focus on the site-specific elements of the plan rather than the overall approach to tall buildings, especially where individual heritage assets are vulnerable to several

allocations. Improved detail for site specific policies would be one way to capture and deal with the higher-level issues. Although not ideal, it is a way to resolve the issues at this late stage in the plan-making process.

### **Appendix 1: Extract of Historic England Regulation 18 (Stage 2a) response relevant to Matter 13.**

#### Summary:

- Focusing tall buildings and denser development around town centre transport hubs centres is a sustainable approach which we support. However, when it comes to intensification the place-based elements of the plan do not contain enough detail to guide development- this is in relation to sites with particular heritage sensitivities and tall buildings.
- The plan is not clear where tall buildings will be appropriate. Broad locations are identified which is helpful, but a finer grain approach to locations will need to follow.
- The evidence to support building heights and the place-based elements of the plan is, at present, inadequate. There is currently no evidence to support individual allocations or to show how sites have been selected. No densities have been provided, nor has evidence been published to show how a design-led approach has been taken. It is appreciated that this work maybe forthcoming given that the plan is in its early stages.
- Generally, the sites set for allocation are appropriate and there are no sites that raise in principle concerns. Any potential issues regarding height, capacity etc. can be overcome by adding more detail to the policy.
- Much of the plan links to other SPDs. Further clarification on how this is intended to work in practice would be helpful. The SPDs contain detail on maximum height parameters and form, these are strategic issues that would benefit from being hooked back into the plan. It is likely that some elements of the SPDs would need to be translated into the plan to ensure it carries appropriate weight.
- In terms of allocations, the schedules are a helpful format. However, the contents are very general and more detailed guidance would be required where there are heritage sensitivities. Impacts upon heritage assets are limited and they only consider distance, not significance. Where sites are located within Archaeological Priority Areas (APAs) there needs to be a development requirement to submit a Desk Based Assessment (DBA) upon application. Depending on the result of the DBA further investigative work may be required in order to aid decision making.
- Given how transformational regeneration in the three identified growth areas is expected to be, the plan must be based on robust evidence so that it can deliver good growth, as set out in the emerging London Plan. At present we have concerns about the soundness of the plan in its current form regarding how it is justified, in conformity with the London Plan, and how effective it would be. We hope that these can be overcome as the plan progresses.

#### Colliers Wood:



There does not appear to be any published evidence for the Colliers Wood place policies or allocations despite being an area intended for major growth.

- **Key Objectives**– we are pleased to see an objective on heritage.
- **Policy N3.1** – we strongly support part f)
- There are some concerns regarding the Colliers Wood sites with regards to archaeology. Some sites about the tier 1 APA around the priory, and also those around Canons Place, where there is potential for significant unrecorded archaeological remains.

#### Mitcham

- **Key Objectives**– we are pleased to see an objective on heritage.
- **Site Mi16: Mitcham Gasworks**  
There is some concern that this allocation suggests that site could accommodate a tall building. This conflicts with the evidence and the overarching approach to tall buildings, which is that they are only appropriate in the areas of Wimbledon Town Centre, Morden, and Colliers Woods. No evidence has been provided to show how heights have been tested to support a potential tall building on this site.

#### Morden:

We acknowledge that there is limited distinct historic character in Morden town centre itself, and that it is a key regeneration area for the borough. The sensitivities lie in the areas surrounding the town centre which may be vulnerable to issues such as tall buildings. We would encourage you to test the location of tall building proposals at the plan-making stage to avoid unexpected and undesirable harmful impacts to heritage assets (including their settings) caused by inappropriate development. From Historic England's perspective, this should also ensure that the setting of some of the most significant heritage assets within the borough, such as the Grade I listed St Lawrence church, or the Grade II listed Morden Hall, and the Grade II Registered Park and Garden Morden Hall Park are given appropriate consideration at plan-making stage.

Following on from the above we have the following comments:

- It is not clear what status the Morden Strategic Development Framework has in relation to the local plan. It is a useful supporting document, but it is not clear how some of the heights that it suggests have been determined. This framework could be a useful starting point to develop a future Development Plan Document (DPD). DPD status would allow the framework to undergo scrutiny via examination and allow it to contain the extra detail needed that would go beyond the scope of an SPD to provide.
- Morden Hall Park RPAG sits between the Morden and Colliers Wood growth areas. Both areas are identified in the plan as being suitable for tall buildings. It is important that the cumulative of impacts upon these designated heritage assets are understood. This will involve modelling views from within the RPAG in the direction of both Morden and Colliers Woods. The policies for both areas should make specific reference to the risks posed by and the subsequent need to avoid cumulative harm.

- We recommend that the plan refers to the nearby Upper Morden Conservation Area which is on the national Heritage at Risk Register. It is important the new development considers the setting of the conservation area and optimises opportunities to enhance it.
- **3.3.11** – states that site capacities have been tested but that this has not been published. It is crucial that this is published to support the plan. This is needed to demonstrate that site capacities are suitable and have derived from a design-led approach as required by the emerging London Plan.
- **3.3.34** – There are opportunities to intensify development within Morden by identifying *sites* where taller buildings may be appropriate, such sites must be evidenced. It is unlikely that the entire town centre regeneration zone will be appropriate, which is what the text suggests.
- **3.3.37** – talks about a plan-led design, is this going to be in the form of a separate DPD?
- **Policy N3.3 f)** – This part of the policy is generally appropriate but is undermined by the lack of detail as to where tall buildings can go. There is no evidence to support the implication that the entire area is appropriate for tall buildings. The policy requires tall buildings to appropriately located with the zone but does not provide any guidance as to where these will be.
- **Policy N3.3 part i)** – it is not clear what is intended by part i). There is concern that this could be interpreted as providing policy support for tall buildings outside the areas identified as appropriate. This undermines the plan-led approach and conflicts with the emerging London Plan. It is recommended that this policy is rewritten in order to be clearer. Notwithstanding this, the criteria listed should also apply to development within the regeneration zone in terms of requiring high quality design and complementing the surrounding built form.
- **Policy N3.3 part j)** – we support this policy criterion which seeks to conserve and enhance the character and green infrastructure of the wider Morden Town Centre Area. We advise that this is expanded to refer to the historic environment.

**Evidence:** The evidence published in respect of Morden consists of the Morden Town Centre Heritage Review (2020), and Townscape and Visual Assessment of the Hawkins\Brown Strategic Development Framework. While helpful these documents are limited in scope and detail and are not adequate to support the plan proposals:

- The study does not state the heights of the building massing's modelled.
- It is not clear what sites have been modelled, nor is it clear how any of the sites modelled correspond with the allocations. The allocated sites should be modelled.
- More views of the proposed allocations are required.
- Modelling should include different height options.
- The evidence should contain an explanation of why views used were chosen and why they are significant.
- Views from further afield are required to understand cumulative harm. The views assessed so far are very localised views, and do not consider the impact on assets further away e.g. radial axis views from Hampton Court Palace.
- Views from within the RPAG and Conservation Areas outwards are required, not only views of them

- More explanation of significance and sensitivities of heritage assets that could be affected is required. Especially in relation to landscapes, this is necessary to inform design and to mitigate potential impacts - particularly important given how transformational the proposals want to be
- It would be useful if any future studies contained an impact matrix to show how height parameters were reached.
- There is limited information on expected site densities in the plan. This needs to be design led plan stage to show the quantum's allocated sites can suitably and sustainably accommodate rather than leaving this to application stage.

#### Raynes Park:

This part of the plan is generally appropriate, although there does not appear to be any published evidence for the allocations. We would only expect this for sites where there are likely to be heritage sensitivities.

#### South Wimbledon and Wimbledon:

There does not appear to be any published evidence for the Wimbledon place policies or allocations despite being an area intended for major growth. This may be in preparation, but it would be helpful to discuss this further. It is crucial that plans are properly justified to be found sound. The policies themselves are appropriate in terms of wording, although the lack of evidence undermines the spatial approach that they promote. Notwithstanding this we have the following comments to make on specific sites:

- **Site Wi2 Land adjoining Wimbledon Theatre**  
This site is especially sensitive due to the adjacent listed theatre and is, in our view, inappropriate tall building development. We request that this is explicitly mentioned in the allocation schedule.
- **Site Wi3 – All England Lawn Tennis Club (AELTC) SW19 5AE**  
Wimbledon Park is the surviving part of an extensive 18<sup>th</sup> century landscape park, extended and re-landscaped by Lancelot 'Capability' Brown from 1765 for the first Earl Spencer for his manor house at Wimbledon, itself developed from an earlier equally notable 16<sup>th</sup> century estate. While much of the historic extents of the park were lost to development after the Spencer's sold off land in the 19<sup>th</sup> century, numerous 18<sup>th</sup> century features, including Brown's 9-hectare Lake, veteran parkland trees, areas of woodland (pre-dating Brown) and historic vistas, survive within areas of former parkland converted for recreational uses. This includes the 27 hectares of Lake and land immediately to the east and north east owned and managed by the Merton Council, which was laid out as a public park from the early 20<sup>th</sup> century with a simple grid plan layout of paths around tennis courts and small lawn enclosures for putting green and bowls set amongst areas of ornamental planting and focussed on a central Tea Pavilion, northern Bowls Pavilion and southern White Pavilion.

Wimbledon Park is included in Historic England's *Register of Parks and Gardens of Special Historic Interest* at Grade II\* (LEN: 1000852), which places it within the top 30% of all Registered Parks and Gardens and reflects a level of exceptional historic interest

that needs to be recognised and used to inform management decisions. Furthermore, Wimbledon Park forms a substantial part of the Wimbledon North Conservation Area, which is designated by both Merton and Wandsworth Councils.

Wimbledon Park was added to Historic England's *Heritage at Risk Register for London* in 2015, due in part to impacts to designed views - an issue exacerbated by the accumulation of visual clutter resulting from various ad hoc and incremental changes eroding the character and extent of the historic designed landscape.

The allocation of this site could bring major opportunities for enhancement to help tackle the HAR status of the RPAG. The policy should identify where heritage benefits can be secured. A Conservation Management Plan for the site, or similar supporting documents, should be produced/published to inform the allocation to ensure that it can be sustainably redeveloped. Given the scale of the site it would be helpful if the plan committed to the production of a development brief for the site that could be in the form of an SPD.

The text related to this allocation contains some inaccuracies (reference to the RPG as grade II when it is grade II\*) and provides no acknowledgement of the site being on the HAR register. We request that this be amended.

- **Site Wi8 – South Wimbledon Station, SW19 3DB**

The plan provides little detail as to extent of development expected on this site, however, any new development will be required to preserve the special architectural or historic interest of the listed buildings, and to conserve the wider historic environment.

South Wimbledon Station dates from 1926 and forms part of the architect Charles Holden's first work for the Underground Electric Railway Company of London (UERL) which involved designing stations along the line's southward extension beyond Clapham South to Morden. These stations were clad in Portland stone and of a 'stripped Classical' style based on combinations of simple 3D shapes, predicting his 1930s modernist work. The station is located on a corner prominent station and was intended to be seen in the round. These types of stations were not usually designed for over station development, given that land in these areas was in generous supply at the time. Instead they had a purposely designed setting that extends beyond the station building so it can be viewed from multiple approaches. New development should ensure that the prominence of the station within its setting is maintained as part of any re-development.

It is important that new development does not to disrupt the distinctive architecture, and design detail, that has been deliberately part of a collective and recognisable style with other stations in the Clapham South to Morden group.

We advise that the allocation schedule be expanded upon to provide more detail on the general areas of significance, such as architectural value and setting.

## Places and Spaces

### Strategic Policy LP: D5.1

#### Tall Buildings:

- The areas identified as appropriate for tall buildings are large. It is unlikely that any/every site within the area would be suitable for a tall building and more guidance as to where they can be located within these broad areas, will be required at plan-making level.
- It is not clear from the labelling in the plan whether this is a policy. We advise that it should be a standalone policy.
- We are pleased to see that the plan is clear as to where tall buildings will be acceptable in terms of the 3 broad areas. The issue however, is that the site allocations for Morden Town Centre and Colliers Wood are not detailed enough. With regards to Wimbledon Town Centre there is concern about how appropriate it is to defer to an SPD. SPDs are not part of the development plan and are intended to only provide guidance on the plan itself. Clarification and further links between how the two documents would work together and how the evidence corresponds, would be needed. We advise that some form of plan-level direction is needed. At present there is no bridge between the plan and the Wimbledon SPD.
- The criteria are generally appropriate. We request that part vii. Is amended however to read:  
*Demonstrate they **conserve, and where appropriate, enhance** ~~do not undermine~~ local character and heritage assets **and their setting**.*
- We welcome a clear definition of what constitutes a tall building.
- 5.1.12 – talks about siting tall buildings in accordance with detailed townscape strategies, but it is not clear what these are and who is responsible for producing them, or how they are intended to be meaningful in the decision-making process.
- The policy states that Merton is generally unsuitable for tall buildings due to its prevailing character. Ideally site allocation schedules, outside the 3 main areas broadly appropriate for tall buildings, would be strengthened by an explicit design guidance criterion that they are not suitable for tall buildings. If testing suggests that they might be then they could be added as individual sites identified as appropriate in this policy to ensure a plan-led approach is taken.

**Evidence:** In 2010 Historic England was in general very encouraged by the approach taken within the Tall Buildings Background Paper to identify appropriate, inappropriate and sensitive locations for tall building development. The paper concluded that the majority of the borough is inappropriate for tall buildings, with the three centres of Morden, Colliers Wood and Wimbledon as being the only locations where tall buildings may be appropriate. We continue to agree with this position, and the conclusions of the background paper that even within these centres, there are areas that will be sensitive to tall buildings. We believe that the background paper should be used to more explicitly inform the sub-area/sites within these areas. We advise that the 2010 study should be updated to ensure the plan is properly justified.

