

Statement of Common Ground on Conformity with the London Plan

May 2022

1. Parties Involved and background

- The Mayor of London / Greater London Authority
- The London Borough of Merton

- 1.1. Officers from the Greater London Authority (GLA) and the London Borough of Merton have worked together throughout Merton's Local Plan process. This includes:
- On preparations for the London Plan 2021, including London's Strategic housing market assessment 2017, Town Centre Health Checks and other supporting evidence
 - On an ongoing basis on monitoring developments: the delivery of new homes and other strategic policy matters via LB Merton's input into the London Development Database, hosted by the GLA
 - Directly on Merton's Local Plan, including the GLA's response to Stage 2, stage 2a (both Reg18) and Stage 3 (Reg19) ongoing dialogue via email and telephone and meetings, most recently on 25th January 2021, 25th March 2021 and 6th October 2021

2. Context / Need for a Statement of Common Ground

- 2.1. The Mayor of London issued an Opinion of General Conformity on 6 September 2021, which stated that Merton's new Local Plan Publication Stage 3 was not in general conformity with the London Plan 2021 (LP2021), for the following reason relating to tall buildings:

"As currently written the draft Plan doesn't identify on maps, locations which are considered suitable for tall buildings and nor have appropriate/maximum building heights been set out within those areas."

- 2.2. This Statement of Common Ground aims to address those concerns.

3. The Mayor of London Proposed solutions

- 3.1. The Mayor proposed solutions to address these conformity issues:

"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"*

4. Proposed Modifications to address Conformity Issues

- 4.1. To address the conformity issues with the London Plan 2021, both parties agree to recommend the following modifications to the Planning Inspector where these relate to tall buildings:
- a) Policy D12.6 (tall buildings)
 - b) Policy N3.1 (Colliers Wood),
 - c) Policy N5.1 (Morden), to the policy's supporting text and to Site Allocation Mo1 (Morden Regeneration Zone),
 - d) Policy N9.1 (Wimbledon)
 - e) site allocations Mi1 (Benedict's Wharf) Mi16 (Mitcham Gasworks) RP3 (Tesco Burlington Road) and Wi12 Wimbledon Stadium

(a) Recommended main modification to policy D12.6 (tall buildings)

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 in height from the ground level to the top of the uppermost storey.~~

.....

~~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.~~

1. Tall buildings are only acceptable in the following locations:
 - a) As indicated in the Strategic Heights Diagrams for Colliers Wood town centre, Morden Regeneration Zone and Wimbledon town centre
 - b) Wimbledon town centre, as set out within the chapter on Wimbledon and the Future Wimbledon supplementary planning document,
 - c) Morden Regeneration Zone, as set out within the chapter on Morden
 - d) Colliers Wood, as set out within the chapter on Colliers Wood
 - e) As set out within Merton's adopted Estates Local Plan 2018 for Eastfields and High Path estates.
 - f) Where they are identified within the relevant site allocations: CW2, Mi1, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.
2. The council will generally support tall buildings in those locations set out in part 1 of this policy where:
 - g) Their massing, bulk and height are appropriately sized and located and demonstrate they do not undermine local character and heritage assets and their settings through townscape analysis of short, mid and long views.
 - h) ...

The Strategic Heights Diagrams referred to in part-r of draft policy D12.6 are attached in Appendix 1.

Appendix 4 to this document shows a consolidated version of all the proposed modifications to Policy D12.6 *Tall buildings*. The majority of proposed modifications, as illustrated in **red text** are set out in submitted document OD4, OD4a and OD4b. Further modifications for clarity and in line with the ongoing dialogue with the GLA post submission in December 2021 are proposed in **purple text**

(b) Recommended main modifications to Policy N3.1 (Colliers Wood)

COLLIERS WOOD: POLICY N3.1

- g. Supporting tall buildings within Colliers Wood town centre in accordance with the details in the Strategic Heights Diagram for Colliers Wood town centre and the requirements in Policy D12.6 Tall Buildings.

(c) Recommended main modifications to Policy N5.1 (Morden) to the policy's supporting text and to Site Allocation Mo1 (Morden Regeneration Zone),

MORDEN: POLICY N5.1

- e. Supporting tall buildings within the Morden Regeneration Zone in accordance with the details in the Strategic Heights Diagram for the Morden Regeneration Zone and the requirements in Policy D12.6 Tall Buildings and in limited locations within the Wider Morden Town Centre Area, where they are considered appropriate in order to facilitate intensified development. Tall buildings should be located appropriately and relate well to the surrounding context and public realm, particularly at street level. Tall buildings must be informed by comprehensive townscape appraisal and visual assessment.

Appendix 2 to this document shows the proposed modifications to the supporting text to draft policy N5.1 that ensure the removal of all references to the appropriateness of tall buildings outside of the Morden Regeneration Zone (Site Allocation Mo1)

Appendix 3 to this document shows the proposed modifications to Site allocation Mo1 (in Morden)

(d) Recommended main modifications to Policy N9.1 Wimbledon

WIMBLEDON: POLICY N9.1

- e. Supporting tall buildings within Wimbledon town centre in accordance with the details in the Strategic Heights Diagram for Wimbledon town centre, the requirements in Policy D12.6 Tall Buildings and the Future Wimbledon Supplementary Planning Document (SPD).

(e) Recommended main modifications to all sites within Wimbledon town centre

Cross referencing all the sites within Wimbledon town centre to the Strategic Heights Diagram:

The Main Modification below is proposed to all relevant site allocations within Wimbledon town centre (Wi2; Wi5 Wi6; Wi9; Wi11; Wi13; Wi15 and Wi16) to ensure that each cross-refers to the Strategic Heights Diagrams.

Approach to tall buildings - ~~Development of the site could include taller buildings subject to consideration of impact on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters having regard to the Future Wimbledon SPD~~

The Strategic Heights Diagram for Wimbledon Town centre in D12.6 “Tall Buildings” sets out the height limits for this site.

All building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 “Ensuring high quality design for all developments”, D12.5 “Managing heritage assets” and D12.6 “Tall Buildings” and have regard to the Future Wimbledon SPD.

(f) Recommended main modifications to site allocations Mi1(Benedict Wharf); Mi16 (Mitcham Gasworks) RP.3 (Burlington Road) and Wi12 (Wimbledon Stadium)

Mi1 Benedict’s Wharf

Approach to tall buildings: The size of the site allows for a masterplanned approach which could contain taller buildings of up to 10 storeys subject to consideration of design policies.

Mi16 Mitcham Gasworks

Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to 10 storeys subject to consideration of design policies, along with a replacement telecoms mast on top of the tallest building. ~~impacts on existing character, heritage and townscape.~~

RP3 Burlington Road

Approach to tall buildings: The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings up to 15 storeys subject to consideration of design policies.

Wi12 Wimbledon Stadium

Approach to tall buildings: Development of the site could include taller buildings of up to 10 storeys subject to consideration of impact on existing character and townscape in accordance with policies D12.3 “Ensuring high quality design for all developments” and D12.6 “tall buildings”.

(g) Recommended Main Modification to removed use of words like taller / tallest where this does not improve the clarity of the plan.

Examples can be seen above for Sites Mi1 etc and elsewhere in the Plan, for example:

Approach to tall buildings: The size of the site allows for a masterplanned approach which could contain taller buildings

5. Housing

- 5.1. The Mayor of London issued an opinion on general conformity on 6th September 2021 which with regards to Merton’s Local Plan Publication Regulation 19 Stage 3 housing policies states:

“The Mayor welcomes the close working between GLA and Merton officers which has led to positively addressing a number of concerns raised in his earlier response. This included Merton’s earlier proposed approach to affordable housing, Build to Rent housing and housing numbers. These elements of the draft Plan have been amended and incorporated into this version of the draft Plan. They are now consistent with the LP2021.”

“The draft Plan has been positively amended in light of the Mayor’s most recent comments related to housing and these are noted and welcomed.”

- 5.2. Whilst the Mayor raised no issues on conformity regarding Merton’s new Local Plan Publication Stage 3 housing policies, the Mayor did propose a number of specific suggestions to improve clarity. At a Duty to Co-Operate meeting held on 6th October 2021 between the GLA and Merton officers, these suggestions, together with the proposed additional modifications set out in this Statement of Common Ground, were discussed and agreed by both parties.

Proposed additional modifications to address the Mayor's suggestions

- 5.3. *Mayor's suggestion:* The draft Plan could be clearer on what actions Merton would take in the event of under delivery.
- 5.4. *Merton's response:* we have recommended additional modification AM11.11 to the Planning Inspectors to improve clarity.

AM 11.11

Paragraph 11.2.9

Merton's housing trajectory is supported by Merton's Housing Delivery Test Action Plan which includes details on the actions we can take **in the event of under delivery** to increase the rate and number of homes built in Merton. **These actions include proactive engagement with developers, registered providers and delivery partners to investigate housing delivery constraints and investigation on whether the use of Compulsory Purchase Orders should be considered as a measure to unlock stalled housing sites.** The delivery of sites will be monitored in Merton's Authority Monitoring Report (AMR) and Merton's Housing Delivery Test Action Plan.

- 5.5. *Mayor's suggestion:* The draft Plan could make it clearer that in order to follow the Fast Track Route, planning applications for new homes must meet the borough's tenure split requirements too.
- 5.6. *Merton's response:* we have recommended additional modification AM11.2 to the Planning Inspectors to improve clarity.

AM11.2

Policy H11.1 (f) Housing Provision

Threshold level to be eligible for the Fast-Track Route as set out in the London Plan **and meet Merton's tenure split requirements and** provided all provision is on-site without public subsidy:

- 5.7. *Mayor's suggestion:* Merton should make it explicitly clear whether or not the small sites target has been rolled forward beyond 2029.
- 5.8. *Merton's response:* we have recommended additional modification AM11.9 to the Planning Inspectors to improve clarity.

AM11.9

Paragraph 11.2.8

In accordance with London Plan paragraph 4.1.11, Merton's target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings and includes the rolling forward of the small sites target beyond 2029.

- 5.9. *Mayor's suggestion:* Additional housing that could be delivered as a result of any committed [transport] infrastructure improvements should also be included in the target beyond 2029.
- 5.10. *Merton's response:* Noted. Further minor changes proposed (reference AM11.7): additional wording to be added to para.11.2.4 and new additional paras to be added immediately after para 11.2.4 to address the Mayor's suggestion by clarifying Merton's position concerning additional housing delivery beyond 2029.

AM11.7

Paragraph 11.2.4

In recognition of the significant increase in housing delivery required by these targets, the London Plan states at paragraph 4.1.10, that these may be achieved gradually and encourages boroughs to set a realistic and where appropriate, stepped housing delivery target over a ten-year period. London Plan paragraph 4.1.11 states that if a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings which cover the period to 2041 and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites. Figure 4.2.1 sets out Merton's Housing Trajectory.

New paragraph - Merton supports high quality development, which meets identified needs. Merton faces constrained supply as it is characterised by a very large number of small sites and green spaces. These characteristics are replicated in several of the surrounding and adjacent boroughs.

New paragraph - The SHLAA 2017 findings indicate that for Merton the target for the period 2029/30 to 2033/34 is 474 homes per annum then for the remaining period 2034/35 to 2035/36 increases to 548 homes per annum.

New paragraph - Merton can confirm that there are no committed transport infrastructure improvements which can be considered to provide additional capacity for new homes beyond 2028/2029 as per Merton's Infrastructure Needs Assessment 2021 and Transport for

London's representations on Merton's Local Plan. Merton will continue to work proactively and collaboratively with the Mayor in contributing to addressing much needed additional homes for London.

5. Signatories

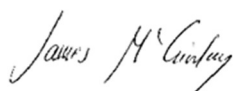
5.1 Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signatories

Signed for London Borough of Merton by:

Name - James McGinlay

Job Title – Assistant Director for Sustainable Communities



Signature -

Date – 8th June 2022

Signed for on behalf of the Greater London Authority by:

Name - Lucinda Turner

Job Title - Assistant Director of Planning

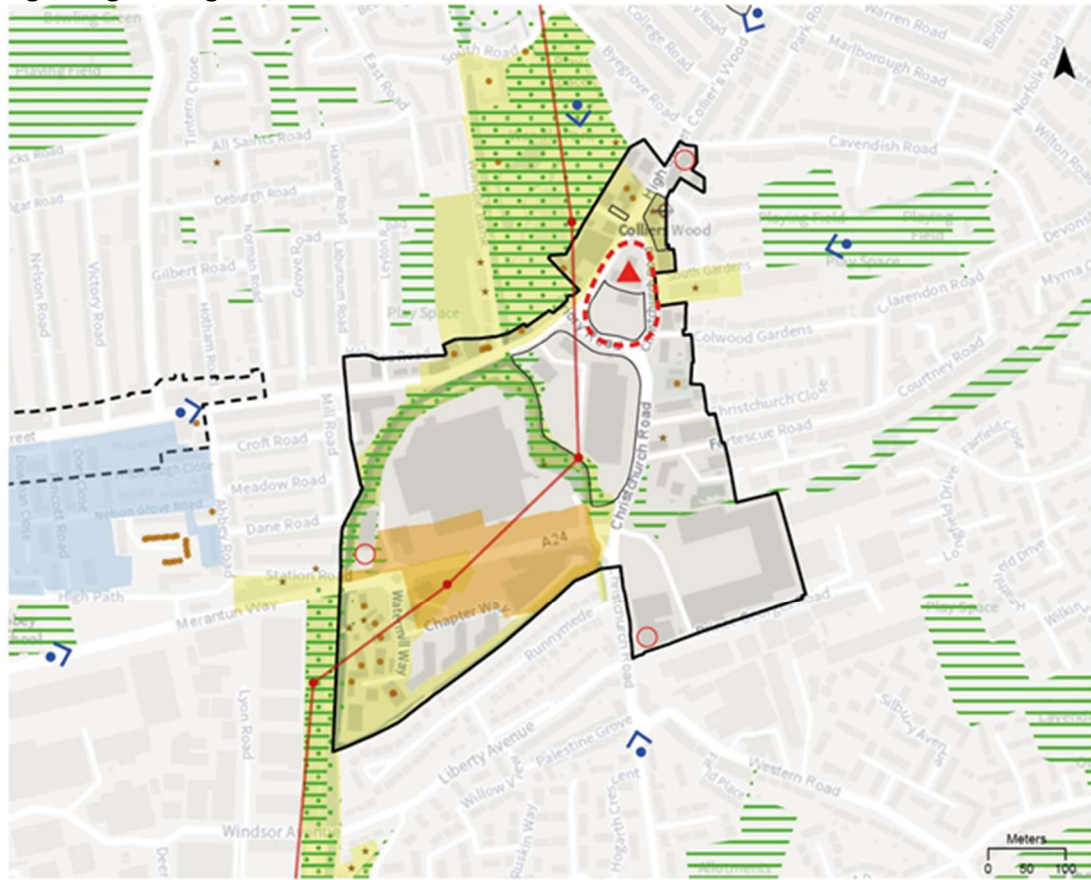
Signature -



Date – 31 May 2022

Appendix 1 - Strategic Heights Diagrams

Strategic Heights Diagram, Colliers Wood town centre.

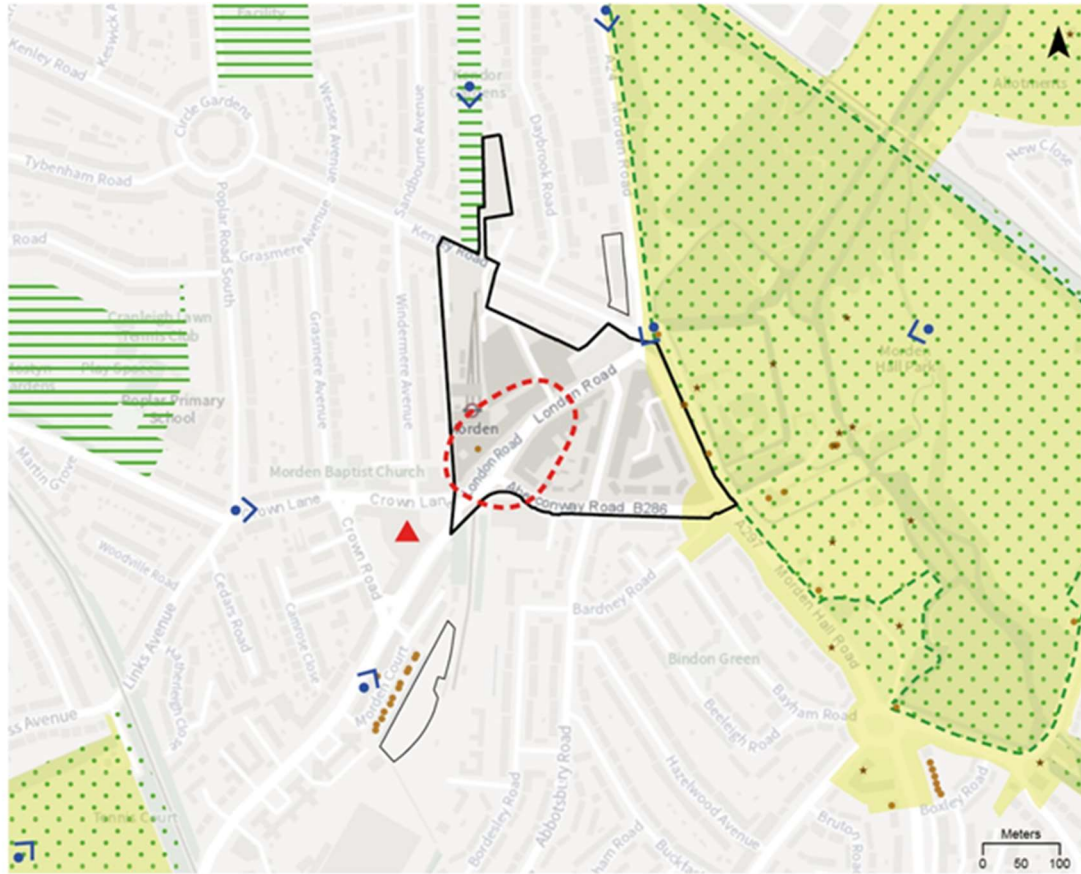


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|--|--------------------------------|
| Colliers Wood town centre heights range: up to 21m [approx. up to 7 storeys] | Estate regeneration: High Path |
| Tall building cluster heights range: up to 49m [approx. up to 15 storeys] | Metropolitan Open Land [MOL] |
| Britannia Point height: 58m [19 storeys] | Open space |
| Gateway buildings | Conservation area |
| Townscape views into town centre | Scheduled ancient monuments |
| Electricity pylons | Registered parks and gardens |
| Site allocations | Listed buildings |
| South Wimbledon town centre | Locally listed buildings |



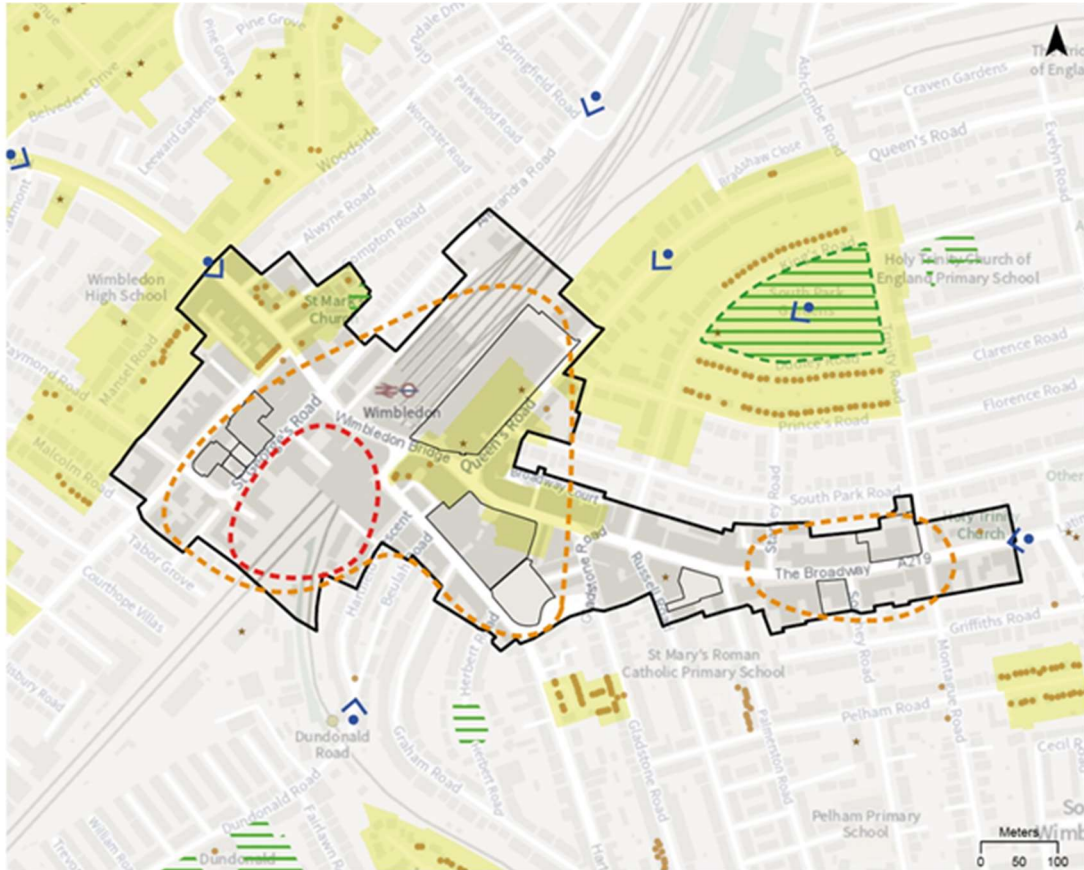
Strategic Heights Diagram, Morden Regeneration Zone.














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|--|--|
|  Morden Regeneration Zone
heights range: up to 39m
[approx. up to 12 storeys] |  Conservation area |
|  Tall building cluster
heights range: up to 71m
[approx. up to 22 storeys] |  Registered parks and gardens |
|  Morden Civic Centre
approx height: 58m [16 storeys] |  Listed buildings |
|  Townscape views into
town centre |  Locally listed buildings |
|  Site allocations | |
|  Metropolitan Open Land [MOL] | |
|  Open space | |



Strategic Heights Diagram, Wimbledon town centre.



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- | | | | |
|---|---|---|------------------------------|
|  | Wimbledon town centre heights range: up to 24m [approx. up to 6 storeys] |  | Conservation area |
|  | Tall building cluster heights range: up to 48m [approx. up to 12 storeys] |  | Registered parks and gardens |
|  | Tall building cluster heights range: up to 40m [approx. up to 10 storeys] |  | Listed buildings |
|  | Townscape views into town centre |  | Locally listed buildings |
|  | Site allocations | | |
|  | Metropolitan Open Land [MOL] | | |
|  | Open space | | |



Appendix 2 – supporting text for Morden N5.1 (proposed in Submitted Document 0D4: Merton’s Local Plan incorporating proposed modifications)

Tall buildings and sensitive edges

~~5.1.32-5.1.26.~~ The introduction of higher density development and tall buildings within ~~in the Wider Morden Town Centre Area and in particular within the~~ Morden Regeneration Zone, will optimise residential development and help to meet the need for additional and mixed housing in the area and will promote a more balanced and cohesive community. The additional population within the town centre will make existing businesses and services more viable and help sustain more facilities in the future, including the potential to develop a night time economy.

~~5.1.33-5.1.27.~~ Tall buildings that meet the requirements in policy ~~D5~~12.6, are considered appropriate as part of the regeneration to deliver optimised residential development and intensified use of the highly accessible land within the Morden Regeneration Zone ~~and in limited locations, were demonstrated to relate well to the surrounding context, on sites within the Wider Morden Town Centre Area that are in close proximity to the Morden Regeneration Zone. Opportunities exist to use tall buildings to enhance the image of Morden.~~ In appropriate locations, tall buildings can assist with reimagining the town centre and the creation of new character areas and features, creating gateways to the town centre and landmarks in key locations that add character and legibility.

~~5.1.34-5.1.28.~~ The Strategic Heights Diagram for the Morden Regeneration Zone specifies height limits in accordance with the London Plan. The proposed height for each building within the Morden Regeneration Zone will need to be justified in accordance with the criteria in policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'. The scale of existing buildings ~~within the suburban Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area,~~ is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties.

~~5.1.35-5.1.29.~~ The Morden Town Centre Visual Impact Assessment (2020) and the Morden Town Centre Heritage Review (2020) use an indicative 3D model of the SDF to

CH.05 | P.194

respectively assess potential height, massing and bulk impacts, and potential impacts on the settings of Heritage Assets, from a selection of viewpoints. Where appropriate, these documents also propose mitigation measures for future detailed development proposals.

5.1.30. In accordance with policies D5.12.6 'Tall buildings' and D5.12.5 Managing heritage assets', development proposals will be required to provide comprehensive townscape appraisals and visual assessments to ensure that any tall buildings are located appropriately and relate well to the surrounding context and public realm, particularly at street level, and conserve and where appropriate enhance the local Heritage Assets. A plan-led approach will ensure that any tall buildings within the Morden Regeneration Zone are sensitively designed and appropriately located, ~~and on sites within the Wider Morden Town Centre Area that are outside but in close proximity to the Morden Regeneration Zone, we will actively co-ordinate the details of proposed tall buildings on a case by case basis with reference to the numerous criteria in policies D5.1 – D5.6.~~

Appendix 3: the proposed modifications to Site allocation Mo1 (in Morden) as set out from page 211 onwards of Submitted Document OD4 Merton’s Local Plan and Policies Map incorporating proposed amendments

Indicative site capacity (new homes): circa 2000 new homes.

Morden Regeneration Zone site vision:

The regeneration vision seeks to take the opportunity to enable large-scale development in the Morden Regeneration Zone town centre, which will secure economic, environmental, and social benefits in accordance with the London Plan. The following are opportunities that could be brought forward on the site through comprehensive regeneration:

1. The delivery of an appropriate mix of retail, office, commercial, community and leisure use, including night-time uses, improved transport infrastructure and public realm, and a significant quantity of new residential development (circa 2,000 units).
2. Comprehensive regeneration of the site, to optimise the delivery of new homes, improve the street scene and public realm, make it easier to get around, and support businesses and other appropriate town centre uses.
3. Transforming the appearance, ~~and~~ user experience and air quality of Morden Town Centre by relocating the bus stands outside the Morden underground station away from their current location ~~and creating to help create~~ healthier streets and a welcoming public space outside the Morden underground station entrance.
4. A range of appropriate public spaces and streets within the Morden Regeneration Zone that enhance accessibility ~~through the Wider Morden Town Centre Area to the surrounding area~~, with pedestrians and cyclists as the priority.
5. Incorporating green infrastructure ~~and where appropriate, contributing to that contributes to improved drainage, air quality and~~ the creation of green links through the Wider Morden Town Centre Area Morden Regeneration Zone, and its surrounding connecting to the open spaces in the surrounding Morden Neighbourhood.
6. The use of tall buildings where appropriate and in accordance with the Strategic Heights Diagram for the Morden Regeneration Zone in order to optimise development that relates well to the surrounding context and public realm, particularly at street level.
7. The provision of an appropriate mix of retail, office, community and leisure uses, including night time uses, which provide an appropriate level of active frontage and do not have an undue impact on neighbouring amenity.
8. The delivery of low carbon district heating within the Morden Regeneration Zone and opportunities to link to the wider area.

A vibrant and functional new town centre, during and after the construction period, with built-in flexibility to respond to changing town centre use patterns, will have to be an essential feature of any proposal.

In accordance with the Strategic Heights Diagram for the Morden Regeneration Zone ~~a plan-led approach~~, taller buildings would be acceptable in this town centre site, to ensuring the best use of this land that benefits from excellent public transport accessibility. Tall buildings must however relate well to the surrounding context and public realm, particularly at street level and must be informed by a comprehensive townscape appraisal and visual assessment.

The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter.

The site location

Approach to tall buildings

The Strategic Heights Diagram for the Morden Regeneration Zone sets out the height limits for this. However, all building heights will be ~~This site will include tall buildings in appropriate locations~~ subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' as part of a plan-led approach, which could take the form of a masterplan, supplementary planning document or an outline planning application.

Appendix 4 – recommended full text of Policy D12.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 top of the uppermost storey.

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.~~

1. Tall buildings are only acceptable in the following locations:

- a. As indicated in the Strategic Heights Diagrams for Colliers Wood town centre, Morden Regeneration Zone and Wimbledon town centre.
- b. Wimbledon town centre, as set out within the chapter on Wimbledon
- c. Morden Regeneration Zone, as set out within the chapter on Morden.
- d. Colliers Wood, as set out within the chapter on Colliers Wood.
- e. As set out within Merton’s adopted Estates Local Plan 2018 for Eastfields and High Path estates.
- f. Where they are identified in the following site allocations, CW2, Mi1, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.

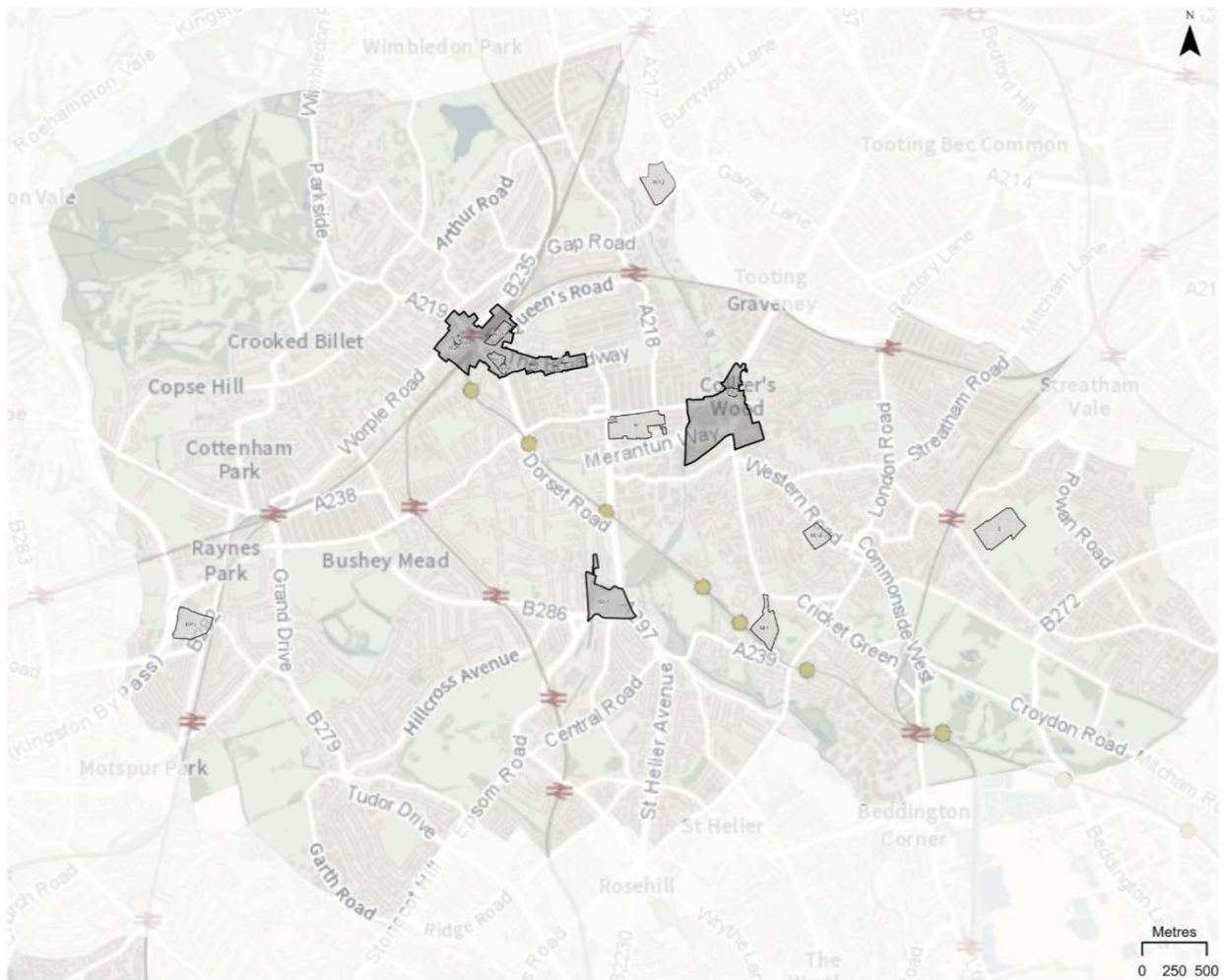
1. WeThe council will generally support tall buildings in those locations set out in part 1 of this policy where:

- g. Their massing, bulk and height are appropriately sized and located and demonstrate they do not undermine local character and heritage assets and their settings through townscape analysis of short, mid and long views.
- h. They enhance the setting and/or relationship with neighbouring heritage assets.
- i. They are of exceptional design and architectural quality.
- j. They ~~are informed by~~ have had regard to the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.
- k. They respond to the council's Design Review Panel, where applicable, which provides independent design scrutiny from a panel of industry experts.
- l. They ensure the ground and lower levels are designed for a human scale and maximise the amount of active frontage and natural surveillance.
- m. They do not impact the opportunities of neighbouring or adjoining sites, including across borough boundaries.
- n. They are designed to mitigate against any micro climatic effects such as sun, reflection and wind, and internal spaces are designed to mitigate overheating.
- o. They create minimal negative harm to the quality of neighbouring public spaces and open spaces.
- p. They include high quality and useable public open space, appropriate in size and location to the building and its site characteristics.
- q. ~~They're an~~ An appropriate material pallet that is well detailed and safe is proposed.
- r. They provide a mix of tenure and home sizes in accordance with ~~this Local Plan's policies on~~ Housing.

- s. They incorporate mitigation measures to help prevent suicide and accidental falls for example anti-climb methods, fences, barriers and rails, these will be well designed and should be integrated into the overall design of the building.
 - t. Appropriate provision for waste and bicycle storage is provided and is integrated into the overall design of the building.
 - u. Their shared spaces, such as lobbies, communal gardens and corridors are designed to enhance social cohesion and mental and physical wellbeing.
 - ~~v. They're within Wimbledon town centre, as set out in the Future Wimbledon supplementary planning document.~~
 - ~~w. They are within Morden, as set out and site allocation Mo4.~~
 - ~~x. They are within Colliers Wood, as set out within the site allocation CW2.~~
2. Development proposals for tall buildings should be supported by:
- w. A detailed townscape analysis that includes short, mid and long views and analysis of its impact on their setting. In particular their impact on heritage assets such as parks or buildings and open spaces.
 - x. A digital 3D model in agreement with the council that can be used to evaluate its visual impact across the borough and beyond.

Map of appropriate locations for tall buildings (illustrating Policy D12.6 part 1

(a-f)

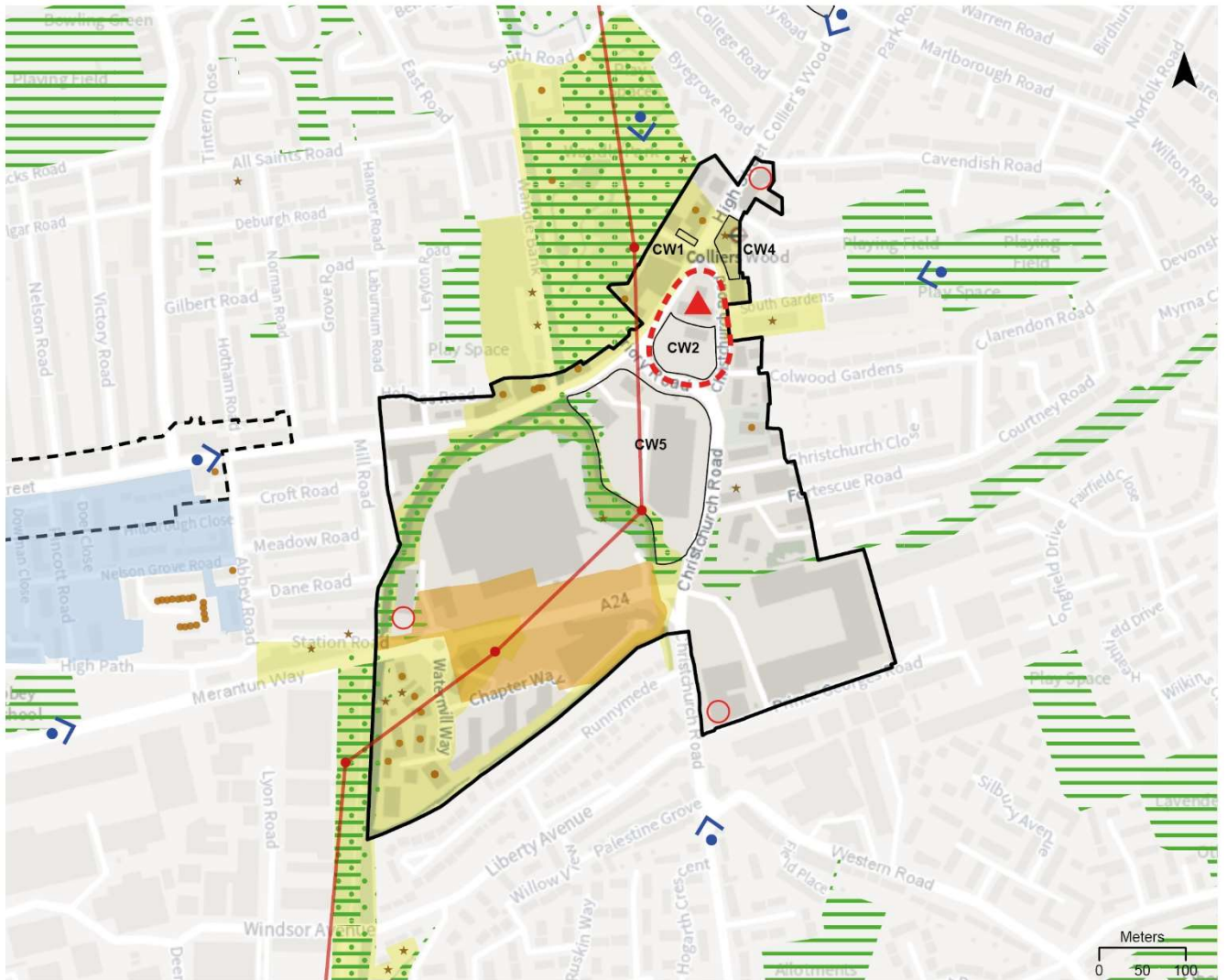


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- Town Centre boundaries
[Colliers Wood, Morden Regeneration Zone & Wimbledon]
- Relevant site allocations and estates local plan boundaries



Strategic Heights Diagram, Colliers Wood Town Centre.

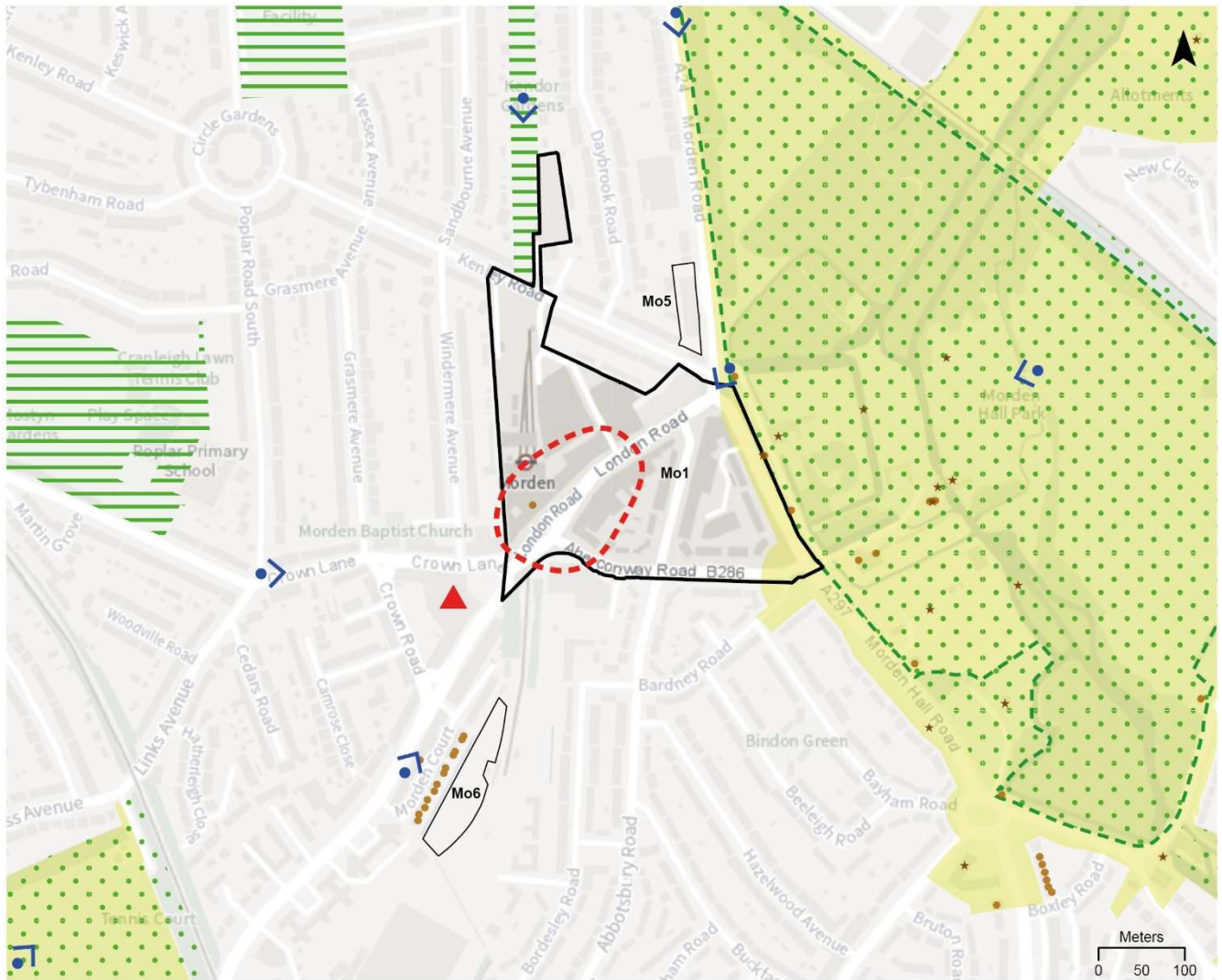


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| <ul style="list-style-type: none"> Colliers Wood town centre heights range: up to 21m [approx. up to 7 storeys] Indicative location of tall building cluster heights range: up to 49m [approx. up to 15 storeys] Britannia Point height: 58m [19 storeys] Gateway buildings Townscape views into town centre Electricity pylons Site allocations South Wimbledon town centre | <ul style="list-style-type: none"> Estate regeneration: High Path Metropolitan Open Land [MOL] Open space Conservation area Scheduled ancient monuments Registered parks and gardens Listed buildings Locally listed buildings |
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Strategic Heights Diagram, Morden Regeneration Zone.

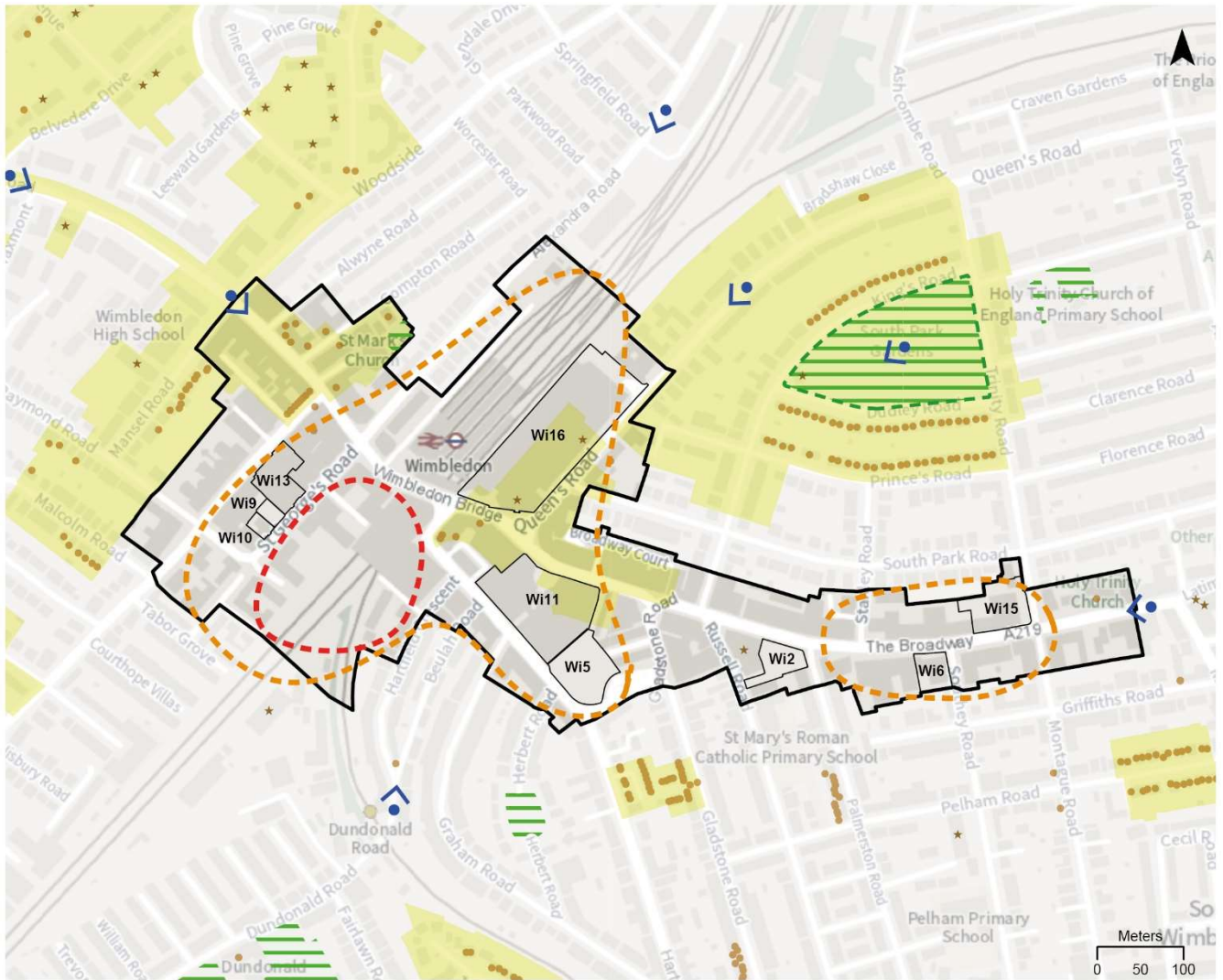


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|  | Morden Regeneration Zone
heights range: up to 39m
[approx. up to 12 storeys] |  | Open space |
|  | Indicative location of tall
building cluster
heights range: up to 71m
[approx. up to 22 storeys] |  | Conservation area |
|  | Morden Civic Centre
approx height: 58m [16 storeys] |  | Registered parks and gardens |
|  | Townscape views into
town centre |  | Listed buildings |
|  | Site allocations |  | Locally listed buildings |
|  | Metropolitan Open Land [MOL] | | |



Strategic Heights Diagram, Wimbledon Town Centre.



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| <ul style="list-style-type: none">  Wimbledon town centre heights range: up to 24m [approx. up to 6 storeys]  Indicative location of tall building cluster heights range: up to 48m [approx. up to 12 storeys]  Indicative location of tall building cluster heights range: up to 40m [approx. up to 10 storeys]  Townscape views into town centre  Site allocations  Metropolitan Open Land [MOL] | <ul style="list-style-type: none">  Open space  Conservation area  Registered parks and gardens  Listed buildings  Locally listed buildings |
|--|---|



Justification-Supporting Text

- 1.1.1. Tall buildings can form part of a masterplan approach to help manage future growth and regeneration opportunities by contributing to new homes and economic growth.
- 1.1.2. Merton's definition of 'a minimum of 21m from the ground level to the top of the building's last habitable floor' provides further clarity and is equivalent to the London Plan definition of 'tall buildings should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey'.
- 1.1.3. Tall and high density buildings can offer a range of benefits. For example, they can reduce the carbon footprint per dwelling by using district energy systems; they can help people live closer to local centres, reducing sprawl and retaining vital open land. When situated close to transport links, such buildings can reduce the reliance on cars and encourage healthier ways of getting around.
- 1.1.4. Tall buildings can also improve wayfinding and add to the visual intricacy of neighbourhoods. However, perhaps more than any other housing typology, tall buildings must balance the needs of individual homes with broader townscape considerations.
- 1.1.5. Exemplary tall buildings located in the right place can make positive contributions to Merton's townscape. However, if poorly designed and located inappropriately they can have a negative functional, environmental and visual impact and as such tall buildings will undergo a high level of design scrutiny.
- 1.1.6. Merton's Borough Character Study gives holistic guidance on best practice design approach highlighting the importance of a sites suitability and sensitivity.
- 1.1.7. Not all tall buildings need to be iconic landmarks. If tall buildings form a cluster or in close proximity to others, they should not compete and their

composition must be considered.

- 1.1.8. Applicants should be prepared to provide 3D digital models to analyse how their tall buildings are placed within the context of the borough and beyond, assessing cumulative impacts of both existing and permitted, but not yet completed, schemes.
- 1.1.9. Consideration must be given to ensure the development is inclusive for all sections of the community, in accordance with policies on Health and Wellbeing.

Appendix 5 – proposed modifications to Policy H11.1 (f) Housing Provision

f. We will expect the following level of affordable housing (gross) to be provided on individual sites as follows:

Threshold (gross)	Affordable housing level	Affordable housing tenure split	Required provision.
10 or more homes	<p>Threshold level to be eligible for the Fast-Track Route as set out in the London Plan <u>and meet Merton's tenure split requirements</u> and provided all provision is on-site without public subsidy:</p> <p>50% for public sector land or on industrial land where redevelopment would result in a loss of industrial capacity.</p> <p>For all other sites up to 50% with a minimum provision of 35%.</p>	<p>70% Low-cost rent</p> <p>30% Intermediate</p>	<p>On-Site</p> <p>Only in exceptional circumstances will the provision of affordable housing off-site or financial contribution in lieu of provision on-site be considered by the council, and this must be justified and such schemes will be required to provide a detailed viability assessment.</p>
2 – 9 homes	Financial contribution equivalent to 20% affordable housing provision.	<p>70% Low-cost rent</p> <p>30% Intermediate</p>	Financial contribution

Tara Butler

Deputy Head of Future Merton
Merton Council
Merton Civic Centre
London Road
Morden
SW4 5DX

Department: Planning

Our reference: LDF24/LDD08/LP06/HA01
31 May 2022

By email: Tara.Butler@merton.gov.uk
future.merton@merton.gov.uk

Dear Tara

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Mayor's Opinion on the General Conformity of Merton's New Local Plan
with the London Plan 2021**

Further to your request on 25 April 2022 for the Mayor's opinion on the general conformity of the draft Merton New Local Plan with the London Plan 2021 (LP2021) and in accordance with Section 24 (5) of the Planning and Compulsory Purchase Act 2004, this letter sets out the Mayor's opinion at this stage of the process. The Mayor will provide an opinion on the general conformity of the plan, should there be a further consultation on proposed modifications to the draft Merton New Local Plan in the future.

In his response, dated 6 September 2021, to Merton's Regulation 19 consultation (Ref: LDF24/LDD08/LP04/HA01¹), the Mayor was clear, at that time, that as currently written the draft Plan did not identify on maps, locations which were considered suitable for tall buildings and nor were appropriate tall building heights set out within those areas. This meant that Merton's approach was not consistent with Policy D9 of the LP2021 and for that reason the Mayor considered the draft Plan to not be in general conformity with the LP2021.

Since that time, GLA and Merton Officers have worked together to resolve the general conformity issues in relation to Merton's proposed approach to tall buildings. The outcome of this collaboration has resulted in proposed modifications to the draft Plan, which the Mayor considers, resolve the general conformity matters raised in his earlier Regulation 19 response. These proposed modifications were agreed between the Mayor and LB Merton on 24 and 25 February 2022 via a Statement of Common Ground (SCG)

¹

<https://www.merton.gov.uk/system/files/Greater%20London%20Authority%20Merton%20Local%20Plan%20Stage%203%20response%20Sept21.pdf>

and this has now been published as part of Merton's examination library². The SCG has now been updated again (May 2022) to include further clarifications on Merton's proposed approach to tall buildings; proposed modifications which the Mayor welcomes.

To be clear, the Mayor now considers that the proposed modifications, set out in the Statement of Common Ground (May 2022), bring Merton's draft Local Plan into general conformity with the London Plan 2021.

If you would like to discuss this in more detail, please contact Hassan Ahmed at hassan.ahmed@london.gov.uk .

Yours sincerely



Lucinda Turner

Assistant Director of Planning

Cc: Leonie Cooper, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC

² <https://www.merton.gov.uk/system/files/0D13a%20Greater%20London%20Authority%20Merton%20SoCG%20March22.pdf>