

**From:**  
**To:** [Future Merton](#)  
**Subject:** Representation submitted on behalf CBRE IM Verity Trust to the Main Modifications to LB Merton Draft Local Plan  
**Date:** 18 March 2024 15:41:24  
**Attachments:** [Representation to LBM Main Modifications on behalf of CBRE IM Verity Trust18 March 2024.docx](#)

---

On behalf of CBRE Investment Management, CBRE IM, who represent the Verity Trust, freeholders of the Sainsbury's foodstore (with separately leased offices above) at 34- 44 London Road, Morden, please see the attached representation to the proposed main modifications to London Borough of Merton Draft Local Plan.

Can you please acknowledge receipt of this email.

Yours faithfully

Representation made on behalf of CBRE Investment Management's (CBRE IM) client, the Verity Trust, who own the freehold of the Sainsbury's foodstore (with separately leased offices above) at 34- 44 London Road, Morden to the Main Modifications to the London Borough of Merton Local Plan.

Sought amendments highlighted in **red bold italics or ~~crossed-out-red bold text~~** as below:

New paragraph 5.1.11 The SDF will inform the procurement of a development partner(s) **which might be necessary to ~~who will~~** help deliver the regeneration within the Morden Regeneration Zone.

***"Development proposals for large sites 0.25 hectares and above) that come forward which can contribute to the delivery of comprehensive regeneration, as stated in Policy N5.1 a, should have regard to the vision , objectives and principles set out in the SDF, as well as recognising the need to bring forward as a priority sustainable, large previously developed sites, which can significantly contribute to the provision new housing in order to meet the Borough's housing needs during the plan period."***

Page 187 – paragraph 5.1.8 “ There are also a multiple other land ownership interests within the Morden Regeneration Zone **and landowners are strongly encouraged to work together. Land assembly of smaller sites within Morden Regeneration** will be required to ensure that the **comprehensive regeneration of Site allocation Mo1 can be achieved by the end of the local plan period** and avoid fragmented development and sub optimal densities in this highly accessible location. **References to comprehensive regeneration in this policy refer to the nature and scale of the regeneration and not a delivery method and in accordance with London Plan policies H1 and H2, references to large sites in this policy refer to sites of 0.25 hectares and above”**

Page 190 – Tall buildings sensitive edges

Paragraph 5.1.33 Tall Buildings that meet the requirements **in policy D12.6** are considered appropriate as part of the regeneration **to deliver optimised residential development on** the highly accessible land within the Morden Regeneration Zone. **In appropriate locations – such as those shown in the Strategic Heights Diagram, Morden Regeneration Zone, tall buildings can assist with the reimagining the Town Centre and the creation of new character areas and features,** creating gateway to the Town Centre and landmarks in key locations that add character and legibility.

**5.1.34 – The Strategic Heights Diagram for the Morden Regeneration Zone indicatively illustrates a composition of appropriate building heights that locate the tallest buildings on and around Morden underground station. To avoid inappropriate abrupt transitions of building heights, the redevelopment of sites immediately adjacent to the tall boundary and indicative clusters identified in the Strategic Height Diagram should be supported by either National or a local Design Code or Design Code as set out in Policy D12.6 “Tall buildings.” 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”**

Page 196 – paragraph 5.1.62

**There are large sites that could come forward with development proposals during the lifetime of this Local Plan that on their own can help to achieve the comprehensive regeneration of Site Mo1. Unlike smaller sites, large sites (of 0.25 hectares or more) are of a size that can optimise capacity for Town Centre Type uses, new homes and support improvements to the public realm and local infrastructure in line with the requirements of this policy.**

Page 209 – Design and accessibility guidance :

4. In accordance with the ***Strategic Heights Diagram for the Morden Regeneration Zone and Policy D12.6 “Tall Buildings”*** tall buildings would be acceptable in this town centre site to ensure the best use of 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 National or Design or Design Code to demonstrate the appropriate stepping up of heights above or below those stated to avoid abrupt transitions in building heights.***

Page 201 – Approach to tall buildings

***The Merton Character Study 2021 and other supporting design evidence has informed the range of appropriate heights set out in Policy D12.6 “tall Buildings” and the Strategic Heights Diagram for the Morden Regeneration Zone. However, appropriate design-led height parameters for this site should be informed by either a National or a locally prepared Design Guide or Design Code which could be prepared either by applicants or the Council. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account the guidance in the National Design Guide and the National Model Design Code. In the absence of Design Guide or Design Code the National Design Guide and the National Model Design Code will be used to guide decisions on future applications.***