

From:
To: [Future Merton](#)
Cc:
Subject: LOCAL PLAN MAIN MODIFICATIONS CONSULTATION - REPRESENTATIONS FROM CRITERION CAPITAL
Date: 22 March 2024 17:02:43
Attachments: [image001.png](#)
[Local Plan MM Reps - March 2024.pdf](#)

Dear Sir/Madam,

Attached are representations submitted on behalf of Criterion Capital Ltd in relation to the above.

Kind regards,

Planner
Centro Planning Consultancy
104 St John Street, London EC1M 4EH

www.centroplan.co.uk

CENTRO

Centro Planning Consultancy is a trading division of LDR Planning Ltd (Reg No. 11819020)

Representations on behalf of Criterion Capital Ltd to the Proposed Local Plan Main Modifications

22 March 2024

Introduction

1. These representation are provided on behalf of Criterion Capital Ltd, in relation to LB Merton's Local Plan Proposed Main Modifications published in February 2024. Criterion Capital ('CC') owns the site in Colliers Wood which is the subject of draft Site Allocation CW2 - Car Park South of Britannia Point, 125 High Street Colliers Wood, SW19 2JG.
2. These representations follow those made by CC at Stages 1 & 2 of the Local Plan Examination in respect of draft Site Allocation CW2 and the draft Tall Buildings policy.
3. The relevant planning application for the site remains under consideration by the LPA.

Ref: MM33 & MM39

4. CC supports the proposed modifications to both paragraph 3.1.18, and to point 3 of the 'Design and accessibility guidance' in draft Site Allocation CW2, to remove the specification that Britannia Point should remain the pinnacle building in the town centre in terms of height.
5. CC concurs with the Inspectors on the removal of this text on the premise of ensuring soundness, in conformity with the NPPF, specifically with regard to the Proposed Plan being positively prepared, effective and justified. This is explained in detail at paragraphs 25 & 26 of the

Inspectors' Post-Hearings letter dated 30th March 2023¹, as well as at paragraph 4 of the Post-Hearings Clarifications dated 26th April 2023².

Ref: MM44

6. CC supports the proposed additional text relating to the approach to tall buildings on site CW2.
7. The text recognises that the 'appropriate' building height indicated by the Merton Character Study 2021 is supplanted by the requirement for a site-specific design-led approach, via a design guide/code.
8. This is owing to the shortcomings of the Merton Character Study 2021 which are identified by the Inspectors within paragraphs 14-16 (and to some extent at paragraphs 20-26) of the their Post-Hearings Letter dated 30th March 2023.

Ref: MM239 & MM249

9. The continued identification of draft Site Allocation CW2 as an appropriate location for tall buildings, as set out in both writing (at Part 1e of draft Policy 12.6) and via the associated map at p440, is supported by CC.

¹ INSP22
² INSP23