

From:
To: [Future Merton](#)
Cc:
Subject: Objection to removing Britannia Point as tallest building in Colliers Wood
Date: 21 March 2024 09:36:17
Attachments: [CWRA Objection Submission to London Borough of Merton Draft Local Plan.pdf](#)

Dear Merton Planning Inspector/ London Borough of Merton

Merton Friends of the Earth are writing to object proposed amendments to the site brief for CW2, the car park adjacent to Britannia Point – specifically, Major Modifications MM39 and MM 42.

Merton Friends of the Earth are a Friends of the Earth local community group, made up of volunteers campaigning for a greener and fairer in Merton.

We believe that allowing the modification to go ahead would cause serious harm to the local environment, air quality, public health, biodiversity, and the natural heritage; and it would impede local efforts to tackle climate change.

We wish to take this opportunity to express our full support for the detailed objections and their summary prepared by the Colliers Wood Residents Association, , including proposal for new modification, which we have attached to this email.

Best regards,

Co-ordinators

Merton Friends of the Earth

mertonfoe.org

Thank you for your support

We are a group of volunteers campaigning for positive change in Merton and beyond.

Take part and find out more about our transformational projects on mertonfoe.org.

Want to join our events? Sign up to our newsletter [HERE](#).

Support us with a donation on [PayPal](#).

London Borough of Merton Draft Local Plan: Modifications recommended following the Examination in Public
SUBMISSION BY THE COLLIERS WOOD RESIDENTS' ASSOCIATION

Background

The Association is confining its comments to the proposed amendments to the site brief for CW2, the car park adjacent to Britannia Point – specifically, Major Modifications MM39 and MM 42. The Association is also proposing an additional modification.

The Colliers Wood Residents Association is the body that represents the views of local residents. The Association is grateful for this opportunity to comment on the proposed modifications to the draft Local Plan arising from the Planning Inspectors Examination in Public.

Summary

The views of the Association are easy to summarise:

- Future developments on site CW2 should be attractive, appropriate and sustainable.
- It is plain for everyone to see that Britannia Point is completely out of place in relation to its surroundings. Taller buildings in the town centre would only serve to exacerbate the abrupt transition from low-rise to high-rise caused by Britannia Point.
- Any building taller than Britannia Point would over-intensify land use in the town centre, blight views across a wide area and deprive nearby businesses, hundreds of homes, Wandle Park and our local primary school of natural daylight.
- The obvious way to avoid these detriments is to stick with the approach in the current Local Plan, which envisages new buildings stepping down in height from the pinnacle of Britannia Point.
- The Association therefore believes vehemently that the height restriction applying to new buildings on site CW2 should be reinstated. Over 500 residents have signed a petition agreeing with this stance.
- It will be difficult for residents to believe in the value of the Local Plan if it fails to protect the local community from inappropriately tall buildings that would blight the area for decades.

Further arguments to support these views are given below.

Major Modification MM39

This modification removes the stipulation in the current Local Plan that “the existing Britannia Point building should remaining the pinnacle in terms of height”.

The importance of site CW2 to Colliers Wood

Because it falls within an Opportunity Area and has been designated as suitable for tall buildings, CW2 is the most important site in Collier’s Wood. The development of the site will affect the amenity of the Town Centre and the quality of life of those who live and work in and around it for decades to come. For this reason it is vital that the new Local Plan encourages development that enhances the character, amenity and environment of the town centre and protects against the blight that would accompany over-intensive development of the site. An explicit limit on the height of any new buildings is an obvious and unambiguous way to safeguard quality of life in the town centre and surrounding neighbourhood.

Intensification and over-development

CWRA recognises the potential of the site for regeneration and the provision of new housing. However, as the scheme put forward in the current planning application demonstrates, unless the Local Plan provides sufficient protection, site CW2 will be subject to speculative attempts at overdevelopment, to the detriment of residents, businesses, green spaces and our local primary school. We believe that Britannia Point should remain the pinnacle building in the town centre.

CWRA notes that the GLA no longer operates a density matrix giving formal guidelines on the maximum housing density permissible on sites across the Capital. Nevertheless, it is self-evident that any residential building that exceeded Britannia Point in height would stretch flexibility on densities well beyond anything that could be considered reasonable. For instance, at 620 units per hectare, the density arising from Criterion Capital’s current planning application (which includes a 26-storey tower) would be nearly two and a half times the maximum density envisaged in the previous London Plan.

We believe that an effective Local Plan should send a clear signal about the need to avoid over-intensive development and excessive housing densities. A maximum acceptable height lower than that of Britannia Point for any new tall building would help to achieve this.

Visual intrusion and loss of natural light

Colliers Wood is not a dense urban area. Britannia Point excepted, the townscape is predominantly low rise. evelopment of the site should aim as far as possible to

preserve the existing daylight and sunlight values of the town centre and surrounding area. A tower higher than Britannia Point would do completely the opposite.

Contributing to Merton's housing targets

CWRA acknowledges the need for additional housing across the Capital and in Merton in particular. We are aware that the Council needs to meet challenging housing targets over the next 10 years. The Local Plan demonstrates that there are myriad opportunities to develop new housing across the borough, including dozens of brown field sites. Site CW2 can contribute to the achievement of housing targets, but this should not be achieved through the building of an excessively high tower or towers that will have a negative impact on the neighbourhood for many decades.

Major Modification MM44

This modification inserts the following text concerning site CW2

“The Merton Character Study 2021 indicates that buildings of around 52m (approximately 15 storeys) may be appropriate on this site. However, appropriate design-led height parameters for this site should be informed by a 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 contained in the National Design Guide and the National Model Design Code. ***In the absence of a Design Guide or Design Code the National Design Guide and the National Model Design Code will be used to guide decisions on future applications.***”

CWRA welcomes the idea of a design guide for site CW2 and agrees that this should be based on effective community engagement and reflect local aspirations for the development of the area. However, the final sentence robs the earlier part of its value by suggesting that planning applications could be determined without such a code being in place. The National Design Guide and the National Model Design Code are national documents and can provide little by way of useful guidance on the type of development that is suitable on this specific site.

This modification is also inconsistent with paragraph 3 of the design and accessibility guidance for site CW2, which states, clearly and helpfully, that

“Local design guides and codes should be prepared for these sites, either by applicants or the council.”

The current drafting of MM44 therefore lacks consistency and clarity. This should be

rectified by removing the final sentence.

Proposed additional MM

CWRA notes that the site specifications for many of the other Merton sites considered suitable for tall buildings contains the requirement that:

“All building heights will be subject to their impact on existing character, townscape and heritage in accordance with the chapter on Places and Spaces for a Growing Borough.”

It is not clear why this wording has been omitted from the site specification for CW2, and CWRA believes that it should be included.

