
Dear Sir / Madam,

Please find enclosed representations submitted on behalf of Criterion Capital. We would be grateful for confirmation of receipt of these representations.

Please do not hesitate to contact me with any queries you may have in relation to the enclosed.

Yours sincerely,



Our ref: NW/Q100694
Your ref:
Email:
Date: 22nd March 2021



Planning Policy Team
London Borough of Merton
Merton Civic Centre
London Road
Morden
SM4 5DX

By Email

Dear Sir/Madam

Merton Character Study SPD (2021) – Consultation Representations submitted on behalf of Criterion Capital

Quod is instructed by Criterion Capital ('Criterion') to submit representations to the Merton Character Study SPD. These representations are submitted within the consultation period of Tuesday 9th February to 23rd March 2021.

Quod has recently submitted representations on behalf of Criterion to the LB Merton New Local Plan 2020-2035 (February 2020) Regulation 18 document, which closed on 1st February 2021. Quod comments on each document will need to be read together as Criterion's land interest at the land south of Britannia Point, known as Watercress Island, is covered by both documents.

Criterion Capital's Development Objectives

Criterion recognises the following ambitions of LB Merton, and wishes to work with the authority to deliver the following recognised objectives for the Borough, as set out within the draft Local Plan (2020):

- Increased housing delivery, including genuinely affordable homes;
- Ensuing land optimisation and promotion of the most efficient use of land and buildings;
- Encouraging high quality, mixed-use developments with higher densities;
- Promoting the economy by supporting business and job creation, and supporting future job markets;
- Ensuring growth is sustainable and supported by infrastructure to meet the needs of the growing number of residents, works and visitors.

Criterion own the land south of Britannia Point, known as 'Watercress Island' ('the Site'). The site comprises roughly a square shaped parcel of land (0.43ha), which is currently vacant land. It is therefore considered as a suitable and available brownfield site which can help meet the Council's objectives.

Quod | 8-14 Meard Street London W1F 0EQ | 020 3597 1000 | quod.com

Quod Limited. Registered England at above No. 7170188





The site is subject to draft site allocation “CW2 – Car Park South of Britannia Point, 125 High Street Colliers Wood, SW19 2JG”. Criterion at Watercress Island can help achieve the Council’s recognised objectives by delivering the following:

- More housing to meet LB Merton’s aim of 13,263 additional homes for the period 2020/21 – 2034/35.
- A mix of uses, including substantial new homes (including affordable), employment and community uses;
- Significant increase in the number of jobs provided in the area.

Watercress Island is free of land ownership issues and has immediate residential development capacity. This site can help Merton meet its housing growth ambitions, and indeed, is fundamental to it. It will play a role in being a catalyst for housing growth within the immediate area, and borough.

This is particularly important as Merton Council is only just meeting its minimum housing delivery test as measured by the Government in January 2021 (103%). It also needs to be in conformity with the newly adopted London Plan (2021) which seeks to ensure that the potential of London’s growth corridors; Opportunity Areas and town centres are maximised. Adopted Policy D3 clearly states that ‘higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high-density buildings, expansion of the areas should be positively considered by Boroughs where appropriate’.

Table 2.1 of the London Plan defines Wimbledon/Colliers Wood/South Wimbledon as an Opportunity Area with scope for 5,000 homes and 6,000 jobs.

To date, Criterion have worked in collaboration with the LB Merton, the Greater London Authority (GLA), and Transport for London (TfL) throughout the recent preparation and submission of a planning application which seeks the redevelopment of the site for residential and non-residential uses which meets the above development objectives of the draft Local Plan: Stage 2a (2020).

Merton Character Study SPD (2021) – Consultation

Considering the existing policy direction within National Policy, and the adopted London Plan, we wish to make comment on the following policies within the draft Merton Character Study SPD (2021) document.

Chapter D: Colliers Wood

Within the LB Merton New Local Plan 2020-2035 (February 2020) Regulation 18 document, Watercress Island is recognised as ‘Site Allocation CW2 – Car Park South of Britannia Point, 125 High Street Colliers Wood, SW19 2JG’. The allocation supports the delivery of new homes as part of a mixed-use development. Residential on upper floors with any of the following on the ground floor



(financial and professional services, food and drink, office, assembly, health/day centre) or other sui generis use that is a suitable mix right for a town centre.

Criterion support the Council's recognition within the draft New Local Plan (2020) that the approach to tall buildings at Site CW2 recognises that mixed-use redevelopment within the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape and based on the principles of a family of buildings of varying height, forming a coherent cluster that enhances the wider Colliers Wood area. This approach complies with Policy Strategic Policy LP D5.1 (Tall Buildings) which explicitly states that proposals for tall buildings will be permitted only within Colliers Wood town centre where they are sized and appropriately located in accordance with the following criteria "(iii). within Colliers Wood", as set out within the site allocation CW2.

In regards to the draft Character Study SPD (2021), Criterion supports the 'Baseplan & Proposals/Opportunities' map on Page 49 of the document – as shown below (Figure 1.1). Criterion agree with the positioning of the 'Strategic Landmark' marker which identifies Watercress Island as a suitable location for a landmark development within Colliers Wood. This is consistent with the site allocation and aspirations contained within the LB Merton Reg 18 draft New Local Plan (2020), and the inclusion within this Character Study SPG is welcomed.

Figure 1.1 – Colliers Wood Baseplan & Proposals/Opportunities Map





Conclusion

Thank you for providing us with the opportunity to comment on the emerging draft Merton Character Study SPD (2021). On behalf of Criterion, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional, or national level.

We would be grateful for confirmation of receipt of these representations. Please do not hesitate to contact us via the details at the head of this letter should you require any further information.

Yours sincerely,

Senior Planner