

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

Paragraph 54, (a) to (c)

Inspectors' letter:

54(a) Confirmation of whether the Council's suggested MM, contained in document 0D4a have been the subject of public consultation (see paragraph 7)

7. *Main Modifications (MM) can only be made to development plan documents where they are necessary for soundness and/or legal compliance, and only where they are recommended by Inspectors appointed to examine them. Moreover, such MM would be subject to public consultation at the appropriate point of the examination, in accordance with the arrangements set out in Section 6 of the Procedure Guide. Whilst we note that the Council's suggested MM have been the subject of Sustainability Appraisal, it appears that they have not been publicly consulted on. We would be grateful if the Council could confirm whether our understanding of the position in terms of public consultation is correct.*

Council response

- 1.1. Yes, it is correct that the council's recommended Main Modifications set out in [Document 0D4a](#) (and illustrated within the Regulation 19 Local Plan in [Document 0D4](#)) have not been subject to public consultation. These recommended Main Modifications arose largely from responses to Regulation 19 publication of the Local Plan (Document 0D1).
- 1.2. Please note that the Main Modifications set out in [Document 0D4a](#) (and illustrated within the Regulation 19 Local Plan in [Document 0D4](#)) that were submitted to the Secretary of State on 2nd December 2021 with the Local Plan have themselves been revised as part of the responses to this letter. The revisions are indicated by the date on the right hand column,

54(b) A view on whether the Council wish, at this stage, to request us to recommend MM in accordance with the procedure outlined in s20(7C) of the 2004 Act (see paragraph 8);

8. *We can only recommend MM if asked to do so by the Council (per s20(7C) of the Planning and Compulsory Purchase Act 2004 (the 2004 Act)). We would remind the Council that any formal request for us to recommend MM should be made before consultation on them begins. With this in mind, the Council may wish to make such a request in their response to this letter*

Council response

- 2.1. We would like to recommend the Main Modifications to the Inspectors as set out in set out in Document 0D4a dated March 2022 (as amended and

resubmitted with this response and illustrated within the Regulation 19 Local Plan in Document OD4 (dated March 2022).

2.2. However, there may be further Main Modifications that occur as part of the Local Plan Examination Hearings that will take place after 6th May 2022. Therefore, we recommend that this consultation on all Main Modifications could take place after the Local Plan Examination Hearings so that any further Main Modifications (or amendments to the existing ones) could be incorporated into one single Local Plan and it would not lead to confusion.

54(c) Confirmation of the publication date of the Local Plan (see paragraph 10);

10. *There are transitional arrangements in place relating to how national policy relating to First Homes is to be considered in the examination of Local Plans, as set out in the 'Affordable Homes Update Written Ministerial Statement' (the WMS) of 24 May 2021. Moreover, a new version of the National Planning Policy Framework (the Framework) was published in July 2021. To assist our understanding of the implications of these matters, we would be grateful if the Council could supply us with the publication date for the Regulation 19 version of the Local Plan, as this is not immediately apparent from our initial reading of the document. We return to aspects relating to the Framework, and the WMS in further detail below.*

Council response

3.1. Merton's Local Plan was published in accordance with Regulation 19 on 22nd July 2021, as set out on page 1 of [OD8 Merton's Local Plan consultation](#) statement. The end date was 6th September 2021.

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

54(d). Your view on the implications of any changes to the plan period, and whether Policy H11.2 should be identified as strategic (see paragraphs 11 to 13);

Plan period and strategic policies

11. *The Framework requires strategic policies to look ahead over a minimum 15-year period from adoption (at paragraph 22). The Local Plan contains strategic policies and covers the period 2021/22 to 2035/36 (as indicated in Figure 4.2.1 of the plan). However, the plan is unlikely to be adopted until 2022/2023, as hearing sessions would need to avoid the London pre-election period (see also the paragraphs on hearing arrangements, below).*
12. *The Framework also expects (at paragraph 20(a)) that strategic policies, amongst other things, should make sufficient provision for housing. However, we note that Policy H11.2 of the Local Plan, which sets out the housing requirement, has not been identified as a strategic policy.*
13. *In light of the above, we would welcome your initial views on the implications of these matters, and whether further MMs might be needed to secure compliance with national policy in these terms, and in the interests of the Local Plan's effectiveness and positive preparation. In framing an answer to the above, you may wish to consider whether the submitted evidence base sufficiently covers any necessary extension to the plan period, or whether further work might be needed in these regards.*

Merton Council response

[Merton's submitted Local Plan \(OD1\)](#) set out a 15-year plan period of 2021/22 to 2035/36. The Council understands that due to the Local Plan hearing sessions taking place in 2022/23 and the subsequent adoption date for the new Local Plan due to be 2022/23 at the earliest, the Local Plan will need to reflect this by extending the plan period to start from 2022/23 (rather than 2021/22) and end in 2036/37 (rather than 2035/36). To comply with NPPF paragraph 22 and to ensure an effective and positively prepared plan we propose **Main Modifications MM1.1** to ensure that the Local Plan period starts in 2022/23 (not 2021/22) and runs for at least 15 years to 2036/37 and is consistently reflected throughout all relevant sections of the Plan e.g., Figure 4.2.1 of the Plan.

In proposing these main modifications, the Council have reviewed the evidence base for the strategic policies in the Local Plan, as set out in the table below.

Policy H11.2 is a strategic policy, which in accordance with paragraph 20(a) of the NPPF sets out the housing requirement and how delivery of sufficient additional homes for the 15 year Plan period will be delivered and achieved. The Local Plan housing requirement set out in policy H11.2 is based on the targets adopted for Merton within [Document OD32 London Plan 2021](#) which covers the period 2018/19 to 2028/29. In accordance with the London Plan, Merton's housing requirement for the period 2029/30 to 2036/37 is drawn from the findings of [Document 11D2 Strategic Housing Land Availability Assessment](#) (2017 SHLAA). The

2017 SHLAA covers a 24 year period from 2018-2041 therefore robustly supports the extension of the Local Plan to 2036/37. Local Plan policy H11.2 was identified as a strategic policy in the [New Local Plan Stage 2 consultation \(OD17\)](#) which was held between 31 October 2018 and 28 January 2019. Due to a typographical error this identification was omitted after this consultation stage. To comply with NPPF paragraph 20a and ensure an effective plan, we propose a **Main Modification 11.1** to clarify that Policy H11.2 Housing Provision is a strategic policy. Local Plan policy H11.1 is also a strategic policy which in accordance with paragraph 20(a) of the NPPF includes setting out the strategic affordable housing requirement and how delivery of this target will be achieved for the 15 year plan period. Policy H11.1 was identified as a strategic policy in the [New Local Plan Stage 2 consultation \(OD17\)](#) which was held between 31 October 2018 and 28 January 2019. Due to a typographical error this identification was omitted after this consultation stage. To comply with NPPF paragraph 20a and ensure an effective plan, we propose a **Main Modification 11.1** to clarify that Policy H11.1 Housing Choice is a strategic policy.

In proposing a main modification to change the plan period to 2022/23 - 2036/37, the Council have also reviewed the evidence base submitted for each of the strategic policies in the Local Plan. The table on the pages below considers the evidence documents and sets out our assessment of any implications for these evidence documents as a result of changing the plan period.

It is considered that the submitted evidence base sufficiently covers any necessary extension to the plan period. Extending the plan period would increase the population projections minimally, however the overall policy approach would not be impacted. The [GLA 2020 housing led population projections](#) prepared by GLA demography predicts a de minimis increase in population projections from 2035 to 2037 for Merton.

An action that has been identified through this process is for the Council to review and update the Infrastructure Delivery Plan 2021 (14D4) to accurately reflect the projects listed for the first five years of the changed Local Plan period i.e. 2022/23 - 2027/28. This work is underway and the revised IDP will be published and submitted in due course.

Strategic Policy	Evidence Document (and submission reference) <i>We have indicated if any of these documents are submitted for the first time to the examination library</i>	Given the MM to change the plan period, is the evidence reasonable and up-to-date? (NPPF 31)
CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change	<ol style="list-style-type: none"> 1. 2D1 Merton Climate Strategy and action plan 2020 2. 2D2 Intergovernmental Panel on Climate Change - special report on global warming of 1.5C 2018 3. 2D3 Committee on Climate Change "Net Zero - the UK's contribution to stopping global warming 2019 4. 2D4 Climate change act 2008 - UK government 5. 2D5 Mayor's Zero carbon London - a 1.5C compatible plan 2018 6. 2D6 London Environment Strategy 2018 7. 2D7 Merton Council declares a climate emergency 2019 8. 2D8 Merton Climate Action support - Aether 2020 9. 2D9 London Energy Transformation Initiative LETI Climate emergency design guide 2020 10. 2D10 A report for the Committee on Climate Change - the costs and benefits of tighter standards for new buildings Currie Brown AECOM 2019 11. 2D11 Committee on Climate Change "UK Housing fit for the future? 2019 12. 2D12 Towards Net Zero Carbon - achieving greater carbon reductions on site, the role of carbon pricing 2019 13. 2D13 Zero carbon Hub – fabric energy efficiency for zero carbon homes a flexible performance standard for 2016 14. 2D14 Islington energy evidence base Etude 2017 	<ol style="list-style-type: none"> 1. Yes, sets targets of 2030 and 2050, supplemented by a yearly delivery plan. 2. Yes, runs to 2050. 3. Yes, runs to 2050. 4. Yes, runs to 2050. 5. Yes, runs to 2050. 6. Yes, runs to 2050. 7. Yes, runs to 2050. 8. Yes, runs to 2050. 9. Yes, runs to 2050. 10. Yes, runs to 2050. 11. Yes, runs to 2050. 12. Yes, runs to 2050. 13. Yes, this is guidance which is not affected by a change to the plan period. 14. Yes, runs to 2050. 15. Yes, this is a response to the Building Regulations Consultation. Not affected by a change to the plan period. 16. Yes, this is a response to the Building Regulations Consultation. Not affected by a change to the plan period. 17. Yes, this is a response to the Building Regulations Consultation. Not affected by a change to the plan period. 18. Yes, runs to 2050. 19. Yes, runs to 2050.

	<ol style="list-style-type: none"> 15. 2D15 Mayor of London Future Homes Standard changes to Part L and Part F Building Regulations for new dwellings consultation response 2020 16. 2D16 Committee on Climate Change Letter Future Homes Standards and tightening Part L in 2020 17. 2D17 UK Green Building Council response to MHCLG consultation on the Future Homes Standard 2020 18. 2D18 London Environment Strategy 2018 - appendix 2 evidence base 19. 2D19 Clean growth - transforming heating overview of current evidence BEIS 2018 	
<p>HW10.1 Health (including mental health) and wellbeing</p>	<ol style="list-style-type: none"> 1. 0D24 Merton's Air Quality Action Plan.(AQAP) 2. 16D3 The Mayor's Transport Strategy 3. (10D4) 20 Minutes Neighbourhood, Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England' <i>(added to Exam library March 2022)</i> 4. 12D12 Active Design (Sport England) 5. 16D2 Transport for London Healthy Streets Approach 6. (10D8) Government Clean Air Strategy (2019) <i>(added to Exam library March 2022)</i> 7. (10D4) Creating better environments for people living with dementia (RTPI) <i>(added to Exam library March 2022)</i> 8. (10D6 and 10D7) Design for Dementia, the Building Research Establishment (BRE) volume one and two. <i>(added to Exam library March 2022)</i> 	<ol style="list-style-type: none"> 1. Yes, this is produced and reviewed in accordance with the London Local Air Quality Management Framework. Not affected by a change to the plan period. 2. Yes, this is a Mayoral strategy which supports the London Plan 2021. Not affected by a change to the plan period. 3. Yes, this is guidance produced with regard to the NPPF and best practice guidance. Not affected by a change to the plan period. 4. Yes, this is guidance produced by Sport England with regard to the NPPF. Not affected by a change to the plan period. 5. Yes, this is guidance produced by TfL, including indicators and a toolkit. Not affected by a change to the plan period. 6. Yes, this is a government strategy that sets out plans to deal with air pollution. Not affected by a change to the plan period. 7. Yes, this is guidance produced by RTPI. Not affected by a change to the plan period. 8. Yes, this is design guidance produced, that is not affected by a change to the plan period.

H11.1 Housing Choice	<ol style="list-style-type: none"> 1. 0D32 London Plan 2. 11D7 Merton Housing Viability Study 3. 11D8 Merton Strategic Housing Needs Assessment and Strategic Housing Market Assessment 2019 4. 11D1 London Strategic Housing Market Assessment 2017 	<ol style="list-style-type: none"> 1. Yes, London Plan adopted 2021. 2. Yes, the study provides evidence supporting the affordable housing policy requirements being viable when applied alongside London Plan policies; other Local Plan policies and Merton's Community Infrastructure Levy (CIL). 3. Yes, the study provides evidence on the need for different types of housing, and the housing needs of different groups within the Borough. The projections used in the study were for 2017-2035, based on a high and low growth scenario. The evidence reflects the position at the time the report was published, and into the 15-year population projection period and is considered appropriate at the current time. Extending the plan period would increase the population projections minimally, however the overall policy approach would not be impacted. The GLA 2020 housing led population projections prepared by GLA demography predicts a de minimis increase in population projections from 2035 to 2037 for Merton. 4. Yes, the study provides London wide evidence on the need for different types of housing, and the housing needs of different groups.
H11.2 Housing Provision	<ol style="list-style-type: none"> 1. 0D32 London Plan 2. 11D2 London Strategic Housing Land Availability Assessment 2017 	<ol style="list-style-type: none"> 1. Yes, London Plan adopted 2021 and contains provision for rolling 10-year (to 2029) housing targets forward, beyond 10 years, having regard to the London SHLAA. 2. Yes, the SHLAA covers a 24-year period from 2018 to 2041.
D12.1 Delivering well designed and	<ol style="list-style-type: none"> 1. 0D20 NPPF 2021 2. 0D32 London Plan GG1 3. 12D11 Merton's Borough Character Study SPD (Supplementary Planning Document) 	<ol style="list-style-type: none"> 1. Yes, this is national policy. 2. Yes, London Plan adopted 2021.

resilient neighbourhoods	<ol style="list-style-type: none"> 4. 12D9 Merton Conservation Area Character Appraisals 5. 12D2 Merton's Small Sites Toolkit SPD 6. 12D12 Sports England Active Design Guide 7. 2D1 Merton's Climate Strategy and Action Plan 8. 12D10 National Design Guide 9. 12D11 National Model Design Code 	<ol style="list-style-type: none"> 3. Yes, the study provides recommendations to guide a character-led approach to intensification. Not affected by a change to the plan period. 4. Yes, these studies provide sensitive design guidance for developments within conservation areas. Not affected by a change to the plan period. 5. Yes, the toolkit provides recommendations to guide a development on small sites in the borough. Not affected by a change to the plan period. 6. Yes, this is Sport England design guidance. Not affected by a change to the plan period. 7. Yes, sets targets of 2030 and 2050, supplemented by a yearly delivery plan. 8. Yes, this is national design guidance referenced in the NPPF. 9. Yes, this is national design guidance referenced in the NPPF.
EC13.1 Promoting economic growth and successful high streets	<ol style="list-style-type: none"> 1. 0D20 NPPF 2021 2. 0D32 London Plan 	<ol style="list-style-type: none"> 1. Yes, this is national policy. (NPPF reference proposed for amendment to 2021 by Main Modification). 2. Yes, London Plan adopted 2021.
IN14.1 Infrastructure	<ol style="list-style-type: none"> 1. 0D32 London Plan SI6 2. 14D4 Merton Infrastructure Delivery Plan (IDP) 2021 – refers to projects within the first 5 years of Plan period. 3. 2D1 Merton Climate Strategy and Action Plan 4. 2D5 London Mayor's 1.5 degree Action Plan 5. 2D22 National Government's Clean Growth Strategy 	<ol style="list-style-type: none"> 1. Yes, London Plan adopted 2021. 2. Yes, the IDP has been reasonably and recently prepared. If the plan period were to change, the IDP would need to be revised and updated. This would be necessary to reflect any changes in housing and population projections and to ensure infrastructure projects for the first 5 years of the plan are identified to support development in the borough. Action identified for LBM officers: Review first 5 years

	<ol style="list-style-type: none"> 6. (2D48) Views of the National Infrastructure Commission. <i>(added to Exam library March 2022)</i> 7. (2D49) GLA (Greater London Authority) zero carbon pathway modelling <i>(added to Exam library March 2022)</i> 8. 15D1 Merton Green Infrastructure Study 2020 9. 14D5 Merton Playing Pitch Strategy 2019 10. 14D3 Merton Indoor Sports Facility Study 2020 	<p>projects in IDP alongside updated 5 year housing and population numbers.</p> <ol style="list-style-type: none"> 3. Yes, sets targets of 2030 and 2050, supplemented by a yearly delivery plan. 4. Yes, runs to 2050. 5. Yes, runs to 2050. 6. Yes, runs to 2050. 7. Yes, runs to 2050. 8. Yes, see below in O15.1. 9. Yes, see below in O15.1. 10. Yes, see below in O15.1.
W14.4 Waste Management	<ol style="list-style-type: none"> 1. 0D22 National Planning Policy for Waste 2. 0D32 London Plan Policy SI8 3. 14D1 South London Waste Plan 2022 submission version 4. 14D2 South London Waste Plan 2012 	<ol style="list-style-type: none"> 1. Yes, the reference to national policy does not refer to a specific draft and the original 2014 draft NPPW has not been updated. 2. Yes, London Plan adopted 2021. 3. Yes, the reference to the South London Waste Plan does not refer to a specific draft and Part b of policy W14.4 refers to the continued commitment to work in collaboration with the neighbouring partner boroughs and it clarifies that: <i>“The South London Waste Plan sets out the long-term vision, spatial strategy, policies and sites for the sustainable management of waste, and a monitoring framework to assess the success of the policies.”</i> <p>However, the current draft of the South London Waste Plan (Ref. 14D2) was adopted in 2012 and para 14.3.30 of the Stage 3 draft Local Plan (Ref. 0D1) states: <i>“The new South London Waste Plan will address waste management needs during the 15-year period from 2021 till 2036”</i>. Following the Examination in Public hearings in September 2021, the partner boroughs are now likely to adopt the new South London Waste Plan (Ref 14D1) in</p>

		<p>2022. The partner boroughs have recalculated the related waste arisings for the plan period 2022 till 2037. As expected, the results show a very modest increase in arisings and the related proposed modifications will be published for public consultation in 2022, prior to adoption.</p> <p>To improve accuracy, Additional Modification AM14.9 it now proposed to change the dates in para 14.3.30 of the Stage 3 draft Local Plan (Ref. 0D1), as follows: “<i>The new South London Waste Plan will address waste management needs during the 15-year period from 2024² till 2036⁷”.</i></p> <p>4. Refer to 3 above.</p>
<p>O15.1 Open Space, Green Infrastructure and Nature Conservation</p>	<ol style="list-style-type: none"> 1. 0D32 London Plan Chapter 8 2. 0D32 London Plan Policy S5 3. 15D1 Merton Green Infrastructure Study 2020 4. 14D5 Merton Playing Pitch Strategy 2019 (PPS) 5. 14D3 Merton Indoor Sports Facility Study 2020 (ISFS) 	<ol style="list-style-type: none"> 1. Yes, London Plan adopted 2021. 2. Yes, London Plan adopted 2021. 3. Yes, the Green Infrastructure (GI) study provides an up-to-date analysis of the borough’s green infrastructure, open spaces, and biodiversity. It assesses the quantity, quality, accessibility and value of open spaces in Merton. Population projections were used in the open space quantity assessment, to set out the borough’s open space provision (hectares per 1000 people). The projections used were for 2017-2035, based on both a high and a low growth scenario from the Merton SHMA and GLA projections. The evidence reflects the position at the time the report was published, and into the 15-year population projection period and is considered appropriate at the current time. Extending the plan period would increase the population projections minimally, however the overall policy approach would not be impacted. The GLA 2020 housing led population projections prepared by GLA demography

		<p>predicts a de minimis increase in population projections from 2035 to 2037 for Merton.</p> <p>Any open space changes are monitored by the council through the development control process and updates to the Green Infrastructure Study will be undertaken every 5 years alongside Local Plan reviews.</p> <p>4. Yes. The PPS provides an up-to-date analysis of supply and demand for playing pitches in the borough, leading to a set of recommendations and an action plan for future facilities. Population projections were used in the study, forming part of the model for future sports needs throughout the borough. The projections used were for 2017-2035, based on a high and low growth scenario from the Merton SHMA and GLA projections.</p> <p>The evidence reflects the position at the time the report was published, and into the 15-year population projection period and is considered appropriate at the current time. Extending the plan period would increase the population projections minimally, however the overall policy approach would not be impacted. The GLA 2020 housing led population projections prepared by GLA demography predicts a de minimis increase in population projections from 2035 to 2037 for Merton.</p> <p>Any site changes to playing pitches are monitored by the council and the PPS Steering Group and updates to the PPS will be undertaken every 5 years alongside Local Plan reviews.</p> <p>5. Yes. The ISFS provides an up-to-date analysis of supply and demand for indoor sports in the borough, leading to a set of recommendations and priorities for future facilities. Population projections were used in the study, forming</p>
--	--	---

		<p>part of the model for future indoor sports needs throughout the borough. The evidence reflects the position at the time the report was published, and into the 15-year future period and is considered appropriate at the current time. Extending the plan period would increase the population projections minimally, however the overall policy approach would not be impacted. The GLA 2020 housing led population projections prepared by GLA demography predicts a de minimis increase in population projections from 2035 to 2037 for Merton. Any site changes are monitored by the council and updates to the ISFS will be undertaken every 5 years alongside Local Plan reviews.</p>
F15.7 Flood Risk Management and Sustainable Drainage	<ol style="list-style-type: none"> 1. 0D20 NPPF 2021, 2. (15D12) Flood and Water Management Act 2010, (15D13) Flood Risk Regulations 2009 and (15D14) the European Water Framework Directive 2000 transposed into law through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003. <i>(all added to Exam library March 2022)</i> 3. (15D15) National Flood and Coastal Erosion Risk Management Strategy for England (2020). <i>(added to Exam library March 2022)</i> 4. Strategic Flood Risk Assessment 2020 Level 1 and 2 and associated maps (Documents 15D2 to 15D7) 	<ol style="list-style-type: none"> 1. Yes, national policy. 2. Yes, these are Acts, Regulations and Directives. 3. Yes, strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100. 4. Yes, the SFRA is a 'live' document.
T16.1 Sustainable Travel	<ol style="list-style-type: none"> 1. 16D3 The Mayor's Transport Strategy 2. (16D4) Decarbonising Transport – A better, greener Britain <i>(added to Exam library March 2022)</i> 	<ol style="list-style-type: none"> 1. Yes, the Mayor's Transport Strategy was adopted in 2018 and provides overarching transport strategy and policies for London for the period until 2041.

		2. Yes, the Government's Decarbonising Transport Strategy was published in 2021 and provides an overarching national framework for transport policy up to 2050.
Sustainability Appraisal 2021	Census 2011 data and other sources such as ONS (Office of National Statistics), Public Health England, Natural England, Defra, Transport for London.	1. Yes, we can only use the data that is available at the time when carrying out the Sustainability Appraisal. Moreover, Census 2021 data release is spring/summer 2022 at separate periods over the next 18 months to 2 years, with the first data set due in late spring/summer (2022).
Equalities Impact Assessment 2021	Census 2011 data and other sources such as ONS, NOMIS and Public Health England.	1. Yes, we can only use the data that is available at the time of assessment.
Habitats Regulations Assessment 2021	<ol style="list-style-type: none"> 1. Natural England data (Wimbledon & Richmond). 2. EU (European Union) and UK (United Kingdom) (United Kingdom) directives, legislation (Acts) etc. 	<ol style="list-style-type: none"> 1. Yes, the data is live and would possibly change within the plans period. This is normal. 2. Yes, the EU legislation regarding Habitats Directives/legislation on this matter now transposed into UK law/legislation.

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

54(e). The submission of signed SoCG and other documentary evidence in relation to the Duty to Cooperate (see paragraphs 14 and 15);

14. Details of the steps taken to meet the duty in s33A of the 2004 Act are set out in the Council's 'OD13 Duty to Co-operate Statement'. It is clear from Section 4 of OD13 that a number of statements of common ground (SoCG) are still in draft form and being worked on. These documents are integral to the assessment of legal compliance and therefore we urge that these statements are finalised, signed and submitted as a priority and placed on the examination website. We set out below further considerations that would be particularly relevant to any SoCG entered into at this stage with the Greater London Authority (GLA).

Council response

5.1. In addition to the material submitted with [OD13 Merton's local plan duty to co-operate and statements of common ground](#), since December 2021 the council has finalised statements of common ground (SoCG) with the organisations set out below in **Table 54e** and we would like to submit these to the examination library.

15. Moreover, we note the summary of engagement with other local planning authorities in relation to the ability or otherwise of their areas to accommodate some of Merton's housing needs, (at paragraphs 3.7ff of OD13). However, documentary evidence, such as minutes of meetings and letters, relating to these discussions does not appear to have been supplied. Again, we would appreciate copies of the relevant correspondence with other local planning authorities to be made available, albeit redacted in accordance with the Council's procedures relating to data protection, as soon as is practicably possible.

Council response

6.1. [Document OD13 paragraph 3.7 \(page 12\)](#) lists 19 local planning authorities that we wrote to in late 2019 regarding housing matters. We would like to submit this correspondence as Document OD13f *2019 correspondence with local planning authorities on housing matters*.

Table 54 (e.) Statements of Common Ground for submission

Examination library reference	Organisation
OD13a	Greater London Authority SoCG
OD13b	London Borough of Wandsworth SoCG
OD13c	London Borough of Croydon SoCG
OD13d	London Borough of Sutton SoCG
OD13e	Royal Borough of Kingston upon Thames SoCG
OD13f	2019 correspondence with local planning authorities on housing matters
OD13g	Transport for London Statement of Common Ground

Statement of Common Ground on Conformity with the London Plan

February 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 to:
- 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) and RP3 (Tesco Burlington Road)

(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 site allocations Mi1(Benedict Wharf); Mi16 (Mitcham Gasworks) and RP.3 (Burlington Road)

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 9 storeys subject to consideration of design policies impacts on existing character, heritage and townscape.

RP3 Burlington Road

Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to 9 storeys subject to consideration of design policies impacts on existing character, heritage and townscape.

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 our 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

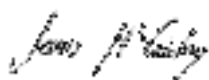
5.1 Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signatories

Signed for London Borough of Merton by:

Name - James McGinlay

Job Title – Assistant Director for Sustainable Communities



Signature -

Date – 25 February 2022

Signed for on behalf of the Greater London Authority by:

Name - Lucinda Turner

Job Title - Assistant Director of Planning

Signature -



Date – 24 February 2022

Appendix 1 - Strategic Heights Diagrams

Strategic Heights Diagram, Colliers Wood town centre.

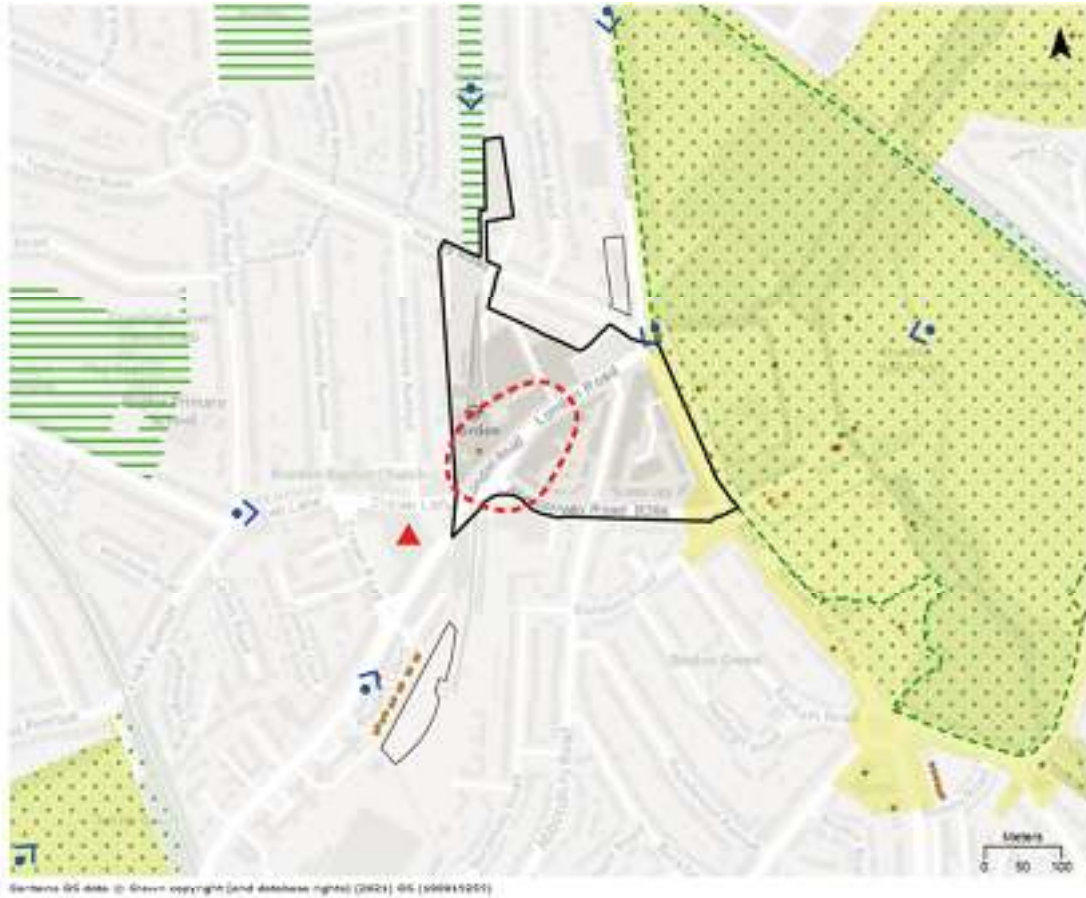


Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)

- | | |
|--|--------------------------------|
| 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.



- | | | | |
|---|--|---|------------------------------|
|  | Morden Regeneration Zone
heights range: up to 38m
[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 (MCL) | | |
|  | Open space | | |



Strategic Heights Diagram, Wimbledon town centre.



Content of data © Crown copyright (and database rights) (2022) OS (10002529)

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



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 D612.6, 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

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 ~~H~~Heritage ~~a~~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:

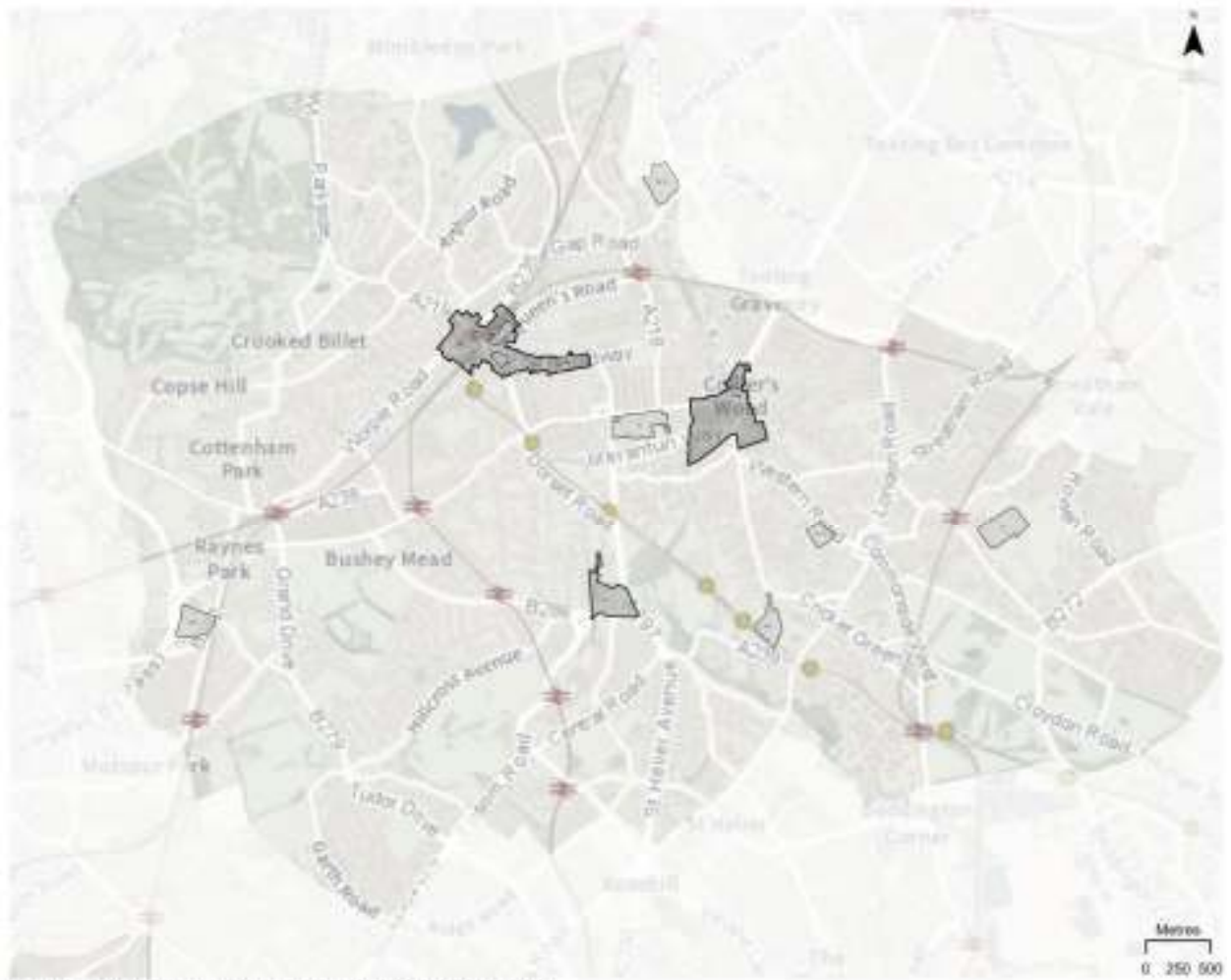
- a. As indicated in the Strategic Heights Diagrams for Colliers Wood town centre, Morden Regeneration Zone and Wimbledon town centre.
- b. Wimbledon town centre, as set out within the chapter on Wimbledon
- c. Morden Regeneration Zone, as set out within the chapter on Morden.
- d. Colliers Wood, as 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. ~~We~~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. 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))



Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)

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



Strategic Heights Diagram, Colliers Wood Town Centre.



- | | |
|---|--|
| <ul style="list-style-type: none">  Colliers Wood town centre heights range: up to 21m [approx. up to 7 storeys]  <u>Indicative location of tall building cluster</u> 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 |
|---|--|



Strategic Heights Diagram, Morden Regeneration Zone.

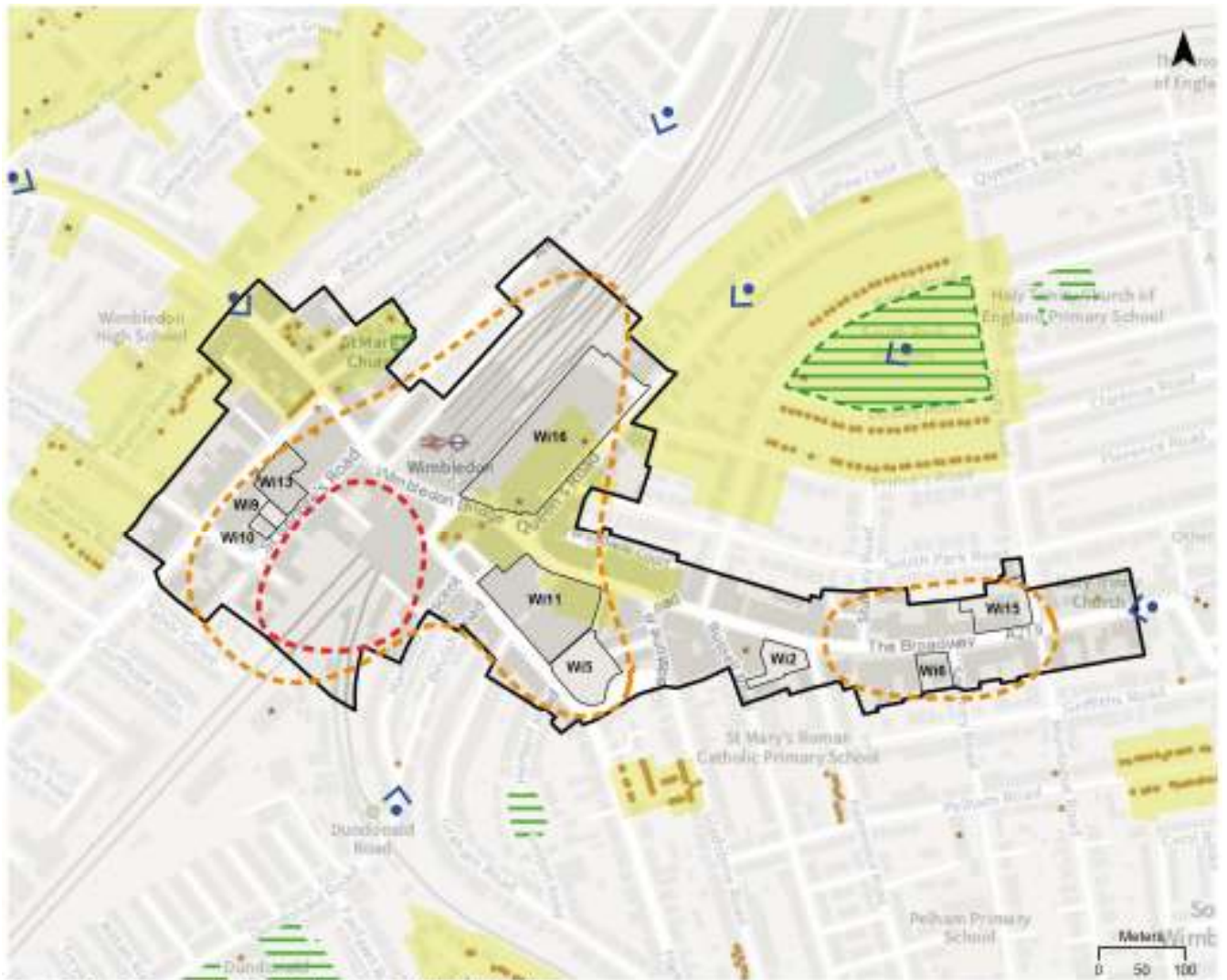


Contains OS data © Crown copyright [and database rights] (2021) OS (100019299)


- | | | | |
|---|---|---|------------------------------|
|  | 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.



Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)

-  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]
-  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	<p>Financial contribution equivalent to 20% affordable housing provision.</p>	<p>70% Low-cost rent</p> <p>30% Intermediate</p>	<p>Financial contribution</p>

Statement of Common Ground Between

London Borough of Merton and
London Borough of Wandsworth

25 January 2022

1. Executive Summary

- 1.1. A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Merton's and Wandsworth's draft Local Plans are '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.
- 1.2. This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them. It also forms part of the evidence demonstrating compliance with the 'duty to cooperate'. In the London context, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.
- 1.3. This SCG does not preclude individual boroughs producing their own Statements of Common Ground covering a different geography and/or issues in support of their own plans. Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating. It forms part of the evidence to demonstrate compliance with the 'duty to cooperate'. The document is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.

2. Parties Involved

- 2.1. This SCG will address strategic spatial policies to be addressed directly by collaboration with the relevant Local Planning Authorities. The London Boroughs listed below have been included as they are immediately adjacent to the London Borough of Wandsworth (LBW). The Council is engaged with them on strategic matters on an on-going basis.
- 2.2. This SCG has been prepared by Merton Council in agreement with the London Borough of Wandsworth.

3. Signatories


London Borough of Merton agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed:  James McGinlay

Position: Assistant Director Sustainable Communities

Date: 27th January 2022

London Borough of Wandsworth agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed: 

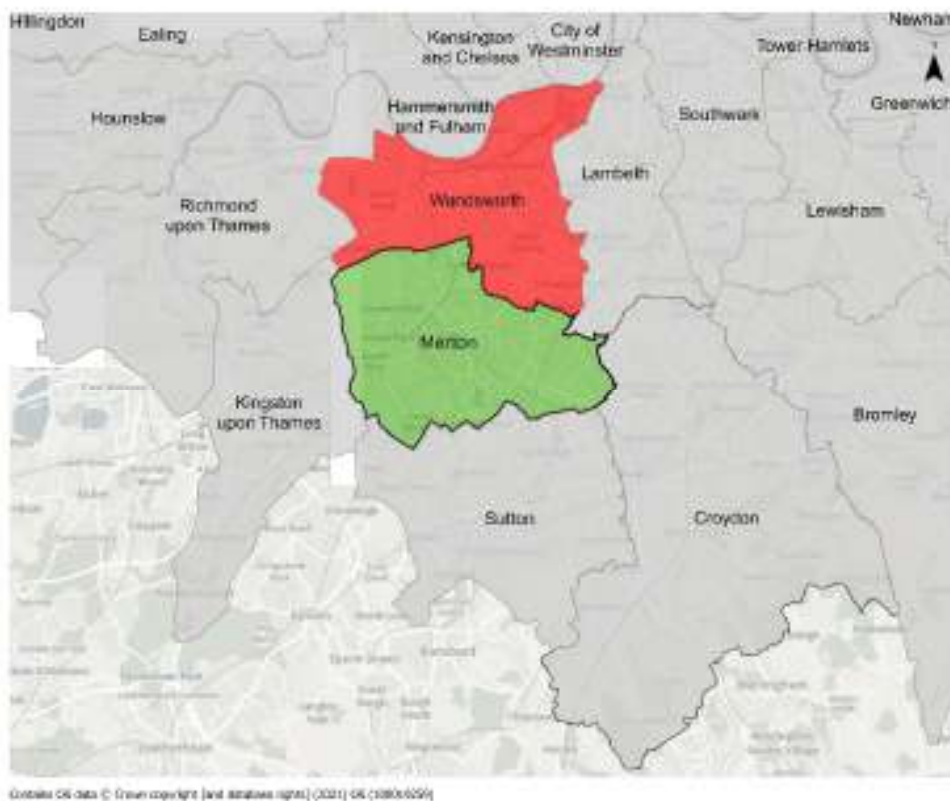
Position: Assistant Director, Environment and Community Services (Planning & Transport Strategy)

Date: 23 December 2021

4. Strategic Geography

- 4.1. This section sets out the factual position regarding cross boundary matters.
- 4.2. Sitting in south-west London:
 - 4.2.1. Merton is where inner meets outer London, bordered by the London boroughs of Wandsworth, Lambeth, Croydon, Sutton and the Royal Borough of Kingston upon Thames.
 - 4.2.2. Wandsworth is an inner London borough bordered by the London Boroughs of Lambeth, Merton and Richmond upon Thames and the Royal Borough of Kingston Upon Thames and, across the River Thames, the London Borough of Hammersmith and Fulham, Westminster City Council and the Royal Borough of Kensington and Chelsea.
- 4.3. The area shown in Map 1 has been identified as the strategic planning area for the purposes of the SCG.

Map 1: The geographic relationship between Wandsworth and Merton



The London Plan

- 4.4. Within the wider London context, collaboration on many strategic issues that go beyond borough boundaries are addressed through the London Plan.
- 4.5. The London Plan is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. The current plan was adopted in March 2021. Every London borough local plan must be in general conformity with the published London Plan. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans, once made. In a London context, collaboration on many strategic issues – such as the distribution of housing, identification of major growth areas, strategic infrastructure etc – are largely addressed through the London Plan, and the formal and informal arrangements that exist between boroughs to enable this to happen.

Strategic Agencies and Authorities in London

- 4.6. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The Strategy uses the 'Healthy Streets Approach', making health and personal experience the priority in planning the city. The Healthy Streets Approach is applied to the whole transport system to help create:
 - a. Healthy streets and healthy people
 - b. A good public transport experience
 - c. New homes and jobs
- 4.7. The boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy.
- 4.8. TfL runs the day-to-day operation of the city's public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's rail infrastructure (to become Great British Railways from 2023).
- 4.9. The All London Green Grid (ALGG) partnership is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations. ALGG aims to promote and protect green and blue infrastructure (including rivers) in London. There are three areas in Wandsworth (the Arcadian Thames, Wandle Valley (shared with Merton) and Central London) and each area framework includes sections of the River Thames and/or River Wandle. Development on the riverside should have regard to the aims of the ALGG and the opportunities identified in the area frameworks.
- 4.10. Thames Water is the statutory water and sewerage undertaker for Merton and Wandsworth and is hence a specific consultation body in accordance with the Town & Country Planning (Local Development) Regulations 2012. Thames Water is helping to deliver the Thames Tideway Tunnel project which will be a new fifteen mile-long 'super sewer' running under the River Thames. Due for completion in 2024, the sewer will replace London's 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River

Thames every year. Wandsworth has six large construction sites for the Thames Tideway Tunnel, including its main shaft site located in the riverside area of Kirtling Street, Nine Elms. The sites will be transformed into new public open spaces, including new promontories in the Thames at Putney embankment and Nine Elms (Heathwall Pumping Station), and opening up new areas of riverside walk in Nine Elms. In Merton, Sutton and East Surrey Water is also a statutory water and sewerage undertaker.

LB Merton

- 4.11. Merton is an outer London borough of around 37 km² situated to the south of Wandsworth. It also borders Croydon, Sutton, Kingston-upon-Thames and shares a small border with Lambeth. Key cross boundary issues between Merton and Wandsworth include the role and function of the Wandle Valley and the value of employment and industrial land uses in this area, travel routes between the two boroughs and beyond, the provision of acute healthcare by St George's Hospital located in Wandsworth that serves south London and other healthcare needs by NHS South West London Clinical Commissioning Group across six boroughs (including Merton and Wandsworth) and the management of Wimbledon Park, which is separated by the borough boundary. The All England Lawn Tennis Club is just within Merton, adjacent to Wimbledon Park, and the AFC Wimbledon Stadium lies just within Merton, to the south of Garrett Business Park Strategic Industrial Location in Wandsworth.

LB Wandsworth

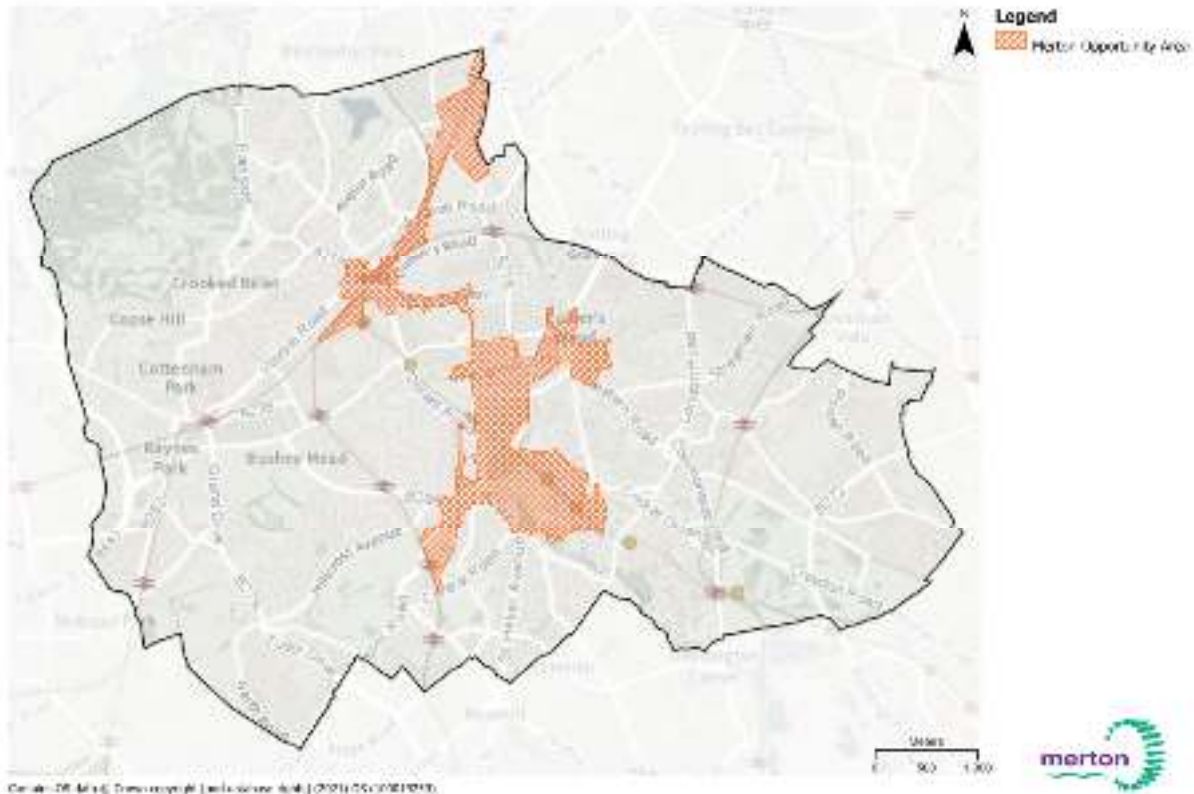
- 4.12. LB Wandsworth is an inner London borough of around 35km² area with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. LB Wandsworth shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond to the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale.
- 4.13. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

Shared Planning Matters

Opportunity Areas

- 4.14. The London Plan identifies areas that will see the most significant change. These are known as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs.
- 4.15. The London Plan 2021 identifies the Wimbledon – South Wimbledon – Colliers Wood Opportunity Area. Merton's draft Local Plan 2022 Chapter 1 proposes the Wimbledon – South Wimbledon – Colliers Wood Opportunity Area boundary as set out below. This borders Wandsworth to the north (Durnsford Road Strategic Industrial Location in Merton)

with the river Wandle acting as the borough boundary. Both boroughs agree there are no cross boundary issues identified.



- 4.16. There are two Opportunity Areas within Wandsworth. The Vauxhall, Nine Elms and Battersea Opportunity Area (VNEB OA) crosses the border between Wandsworth and Lambeth. The London Plan states that the VNEB OA has the potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. In these areas, offices and other CAZ strategic functions may be given equal weight relative to new residential development. Most of the VNEB OA lies within the borough of Wandsworth and will be further connected to both Lambeth and Central London by the new underground stations on the Northern Line. The original masterplan set out two new centres to serve this new neighbourhood and beyond: a major new centre at Battersea Power Station and smaller centre in Lambeth at Vauxhall.
- 4.17. The Plan identifies the redevelopment of Clapham Junction Station as a key driver for growth and change. Improvement of the passenger experience by reconfiguration and modernisation of the station is needed. The Clapham Junction Opportunity Area has been identified to capitalise on both the longer term objectives which would be brought about through the planned Crossrail 2 route through Clapham Junction railway station, and shorter term objectives including the improvements to the station interchange and nearby mixed use development and regeneration opportunities which would allow for a co-ordinated approach for future development. This gives rise to the opportunity to improve the use of land around the station, contributing to the role of Clapham Junction as a major town centre. Crossrail 2 is currently on hold, though its development clearly has cross boundary issues for Wandsworth along its route. In the shorter term the Plan identifies the requirement to produce a masterplan to facilitate the delivery of improvements to the

station and new development in advance the potential future implementation of Crossrail 2. The OA, however, is entirely within Wandsworth and similar cross boundary issues are not anticipated.

Strategic Areas for Regeneration

- 4.18. As outlined by London Plan policy SD10, there are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. The London Plan identifies these neighbourhoods as Strategic Areas for Regeneration (SARS).
- 4.19. The London Plan 2021 identifies Strategic Areas for Regeneration in Merton around the Phipps Bridge, Pollards Hill and Mitcham town centre, some distance from the borough boundaries. Cross boundary issues are not identified.

Housing Market Area

- 4.20. Whilst Greater London is considered to be the strategic housing market area for the purposes of the London Plan and its SHLAA, the more detailed assessment at a local level identifies five sub-regional areas (North, East, West, South and Central). Merton is identified within the South area along with immediate neighbours, Kingston, Wandsworth, Richmond and nearby boroughs of Sutton and Croydon.

Town and Local Centres

- 4.21. The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them.
- 4.21.1. The Merton Local Plan identifies one Major Centre (Wimbledon), three District Centres (Colliers Wood, Mitcham and Morden) and local centres and neighbourhood parades. Colliers Wood is proposed as a new District Centre in Merton's Local Plan. There are not considered to be any cross boundary issues arising from this proposal.
- 4.21.2. The Wandsworth Local Plan identifies five town centres – Wandsworth Town, Putney, Balham, Clapham Junction and Tooting – and beneath this it also identifies local centres and important local parades within the borough (The London Plan identifies Battersea Power Station as a future CAZ retail cluster).
- 4.22. Between boroughs, town centres and parades can be shared by virtue of them crossing the borough boundary. There no instances of this in Merton, but there are two instances of this in Wandsworth, as follows:
- Lavender Hill / Queenstown Road local centre (Lambeth)
 - Clapham South local centre (Lambeth)

Neighbourhood Planning

- 4.23. There is one designated neighbourhood planning area in Wandsworth. The designated Tooting Bec and Broadway Neighbourhood Area lies on the boundary with **Merton**, and includes two Lambeth owned cemeteries (Streatham Cemetery and Lambeth Cemetery).
- 4.24. An application for a neighbourhood forum area in Wimbledon (**Merton**) was refused in July 2021 but is likely to emerge again. This area would have had a boundary with Wandsworth and, at Lambeth Cemetery, a boundary with the Tooting Bec and Broadway Neighbourhood Forum.

Transport

- 4.25. Main roads that cross the border between Merton and Wandsworth and surrounding boroughs:

London Distributor Road:

- A216 (Mitcham Lane) (Lambeth – Wandsworth – Merton)

TfL Road Network:

- A24 (Lambeth – Wandsworth – Merton)
- A3 (Lambeth – Wandsworth – Merton – Kingston)
- A217 (London Road) (Merton – Wandsworth – Hammersmith and Fulham)
- A218 (Durnsford Road) (Merton – Wandsworth)
- A219 (Wimbledon Park Side / Putney High Street) (Merton – Wandsworth – Hammersmith and Fulham)

Overground rail lines that cross the border between Wandsworth and surrounding boroughs:

- Wimbledon loop (Central London – Streatham (Lambeth) – Tooting (Wandsworth) – Haydon's Road, Wimbledon, South Merton, Morden South (Merton) - Sutton
- Earlsfield – Wimbledon Raynes Park (South Western) (Merton)

Underground rail lines that cross border:

- Northern Line (Lambeth, Wandsworth and Merton)
- District Line (Hammersmith and Fulham, Wandsworth and Merton)

Flooding / Critical Drainage Areas

(a) Flood Risk

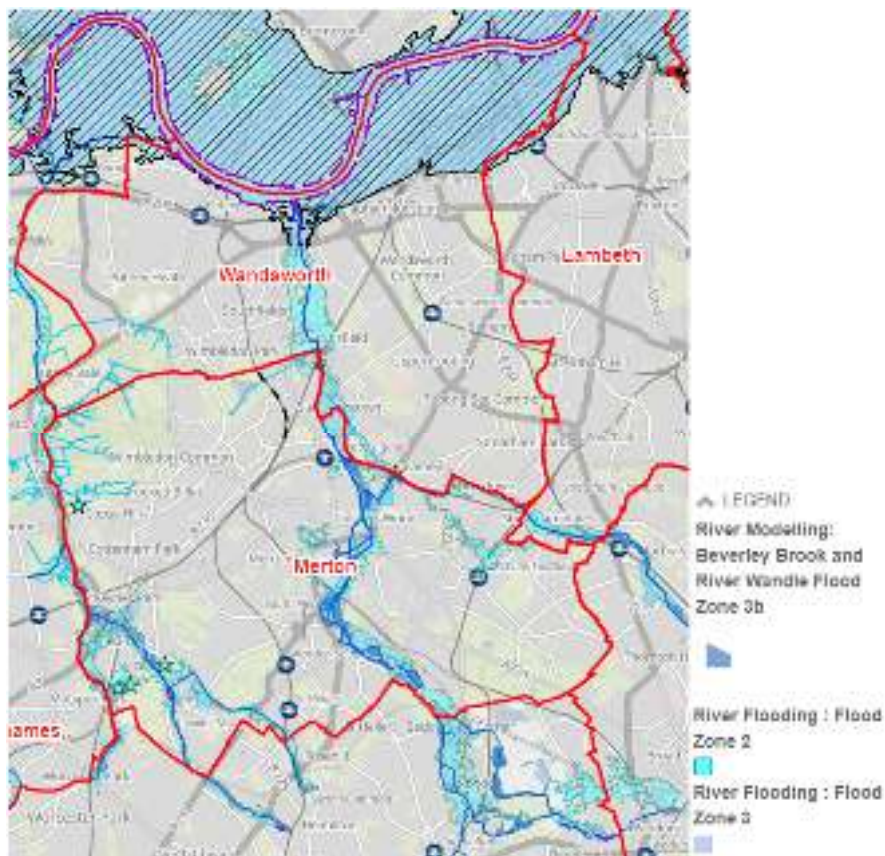
- 4.26. The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance for Flood Risk and Coastal Change (PPG) set out the active role Local Planning Authorities (LPAs) should take to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process. The NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and LPAs should use the findings to inform strategic land use planning.
- 4.27. Merton and Wandsworth Councils have produced an updated joint Level 1 (November 2020) and Level 2 (February 2021) Strategic Flood Risk Assessment (SFRA).

4.28. The Level 1 Merton and Wandsworth SFRA has collated and analysed the most up to date available flood risk data for all sources of flooding to provide an overview of flood risk across the study area. This has been used by both councils to inform the preparation of their Local Plans, including the application of the Sequential Test to site allocations.

The key updates to this revised Level 1 SFRA (2020) include:

- River Wandle Climate Change Modelling (August 2017)
- Online Flood Risk Mapping (to Support the Level 1 SFRA)
- Areas at risk of perched groundwater
- Further commentary on areas to safeguard for flood risk management, the cumulative impact of development, and opportunities to reduce the causes and impacts of flooding.

4.29. There are three fluvial flood zones as defined by the Environment Agency (EA); Flood Zone 1, 2 and 3. These areas have been defined following a national scale modelling project for the EA and are regularly updated using recorded flood extents and local detailed modelling. The flood zones are based on the likelihood of an area flooding, with Flood Zone 1 areas least likely to flood and Flood Zone 3 areas more likely to flood. The map below shows the flood extents that cross adjoining boundaries.



4.30. The Thames Barrier is managed and maintained by the Environment Agency and protects 125 square kilometres of central London from flooding caused by tidal surges. The Thames tidal defences also include tidal walls and embankments along the banks of the River

Thames. Should they fail or become breached, the area most at risk of flooding would be in the north of the borough, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Wandsworth's Strategic Flooding Risk Assessment (2020) Level 1 and 2.

- 4.31. In 2019 the Environment Agency started its first full review and update of the Thames Estuary 2100 Plan (2012). The Plan sets out the measures that require implementing to maintain adequate flood risk protection from the River Thames by the year 2100. Wandsworth is identified within Action Zone 1 (West London). The Plan outlines a number of recommendations to mitigate flood risk within the Central Zone, including to maintain, enhance or replace, the river defence walls and active structures through central London over the 25 years of the plan from 2012 to 2035, and then 2035 to 2050. Within the West Zone, the Plan outlines several recommendations including to agree a programme for putting in place within 25 years, alternative measures for managing fluvial flood risk in the west London tidal area. The Plan advises that by 2065, the existing flood defences of the river wall will need to be raised by 0.5m and a further 0.5 by 2100.

(b) Critical Drainage Areas

- 4.32. A Critical Drainage Area is a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property of local infrastructure.
- 4.33. 11 CDAs were identified across the borough as part of the Surface Water Management Plan.

CDA ID	CDA Name	CDA ID	CDA Name
Group7_014	Putney Heath	Group7_020	South Balham
Group7_015	King Georges Park	Group7_021	Clapham Junction South
Group7_016	Trinity Road	Group7_022	Clapham Junction
Group7_017	St Georges Hospital	Group7_023	Lavender Hill
Group7_018	Summerstown	Group7_024	Tooting Bec

Provision of energy (including heat)

- 4.34. The London Plan states that boroughs should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals within London (see Policy SI3, Energy Infrastructure). It states that development plans should identify the need, and suitable sites for, any necessary infrastructure requirements such as energy centres, energy storage and upgrades to existing infrastructure. Development plans should also identify existing, and propose locations for, heating and cooling networks.

- 4.35. The Mayor has established the London Heat Map as a tool to help this process, and has identified Heat Network Priority Areas, which can be used to where the heat density is sufficient for heat networks to provide a competitive solution for heat provision. Wandsworth is included within a Heat Network Priority Area with central **Richmond**, northern **Merton** and **Lambeth**.

Green infrastructure

- 4.36. Metropolitan Open Land that abuts or crosses the borough boundary into surrounding boroughs:
- Clapham Common (Lambeth and Wandsworth)
 - Tooting Bec and Graveney Commons (Lambeth and Wandsworth)
 - Lambeth Cemetery (Merton and Wandsworth)
 - Wimbledon Park (Merton and Wandsworth)
 - Wimbledon Common and Putney Heath (Wandsworth, Kingston and Merton)
 - Roehampton Club / Bank of England Sports Ground (Richmond and Wandsworth)
 - Putney Lower Common (Richmond and Wandsworth)
 - Mitcham Common (Merton, Croydon and Sutton)
- 4.37. Wimbledon Park is also a defined Historic Park and Garden, and Wimbledon Common is a Special Area of Conservation and Site of Special Scientific Interest. With the exception of Wimbledon Park, each of these sites also holds a designation or protection for their biodiversity interest.
- 4.38. Leader's Gardens (**Richmond**) and Heathbrook Park (**Lambeth**) are larger protected open spaces lying on or across the borough boundaries with Wandsworth.

Views, heritage, design and conservation

- 4.39. Wimbledon Park is a Grade II listed Historic Park and Garden, currently on the Historic England "at risk" register. The northern part of Wimbledon Park is within Wandsworth, with the majority across the boundary to the south, in Merton.
- 4.40. Two conservation areas cross the boundary of, or have a border with each other:
- Wimbledon North (Wandsworth) which abuts Wimbledon North (Merton);
 - Bathgate Road (Wandsworth) which abuts Bathgate Road CA (Merton).

5. Strategic Matters

- 5.1. This section documents key strategic matters covered in Merton's and Wandsworth's Local Plans that are considered to be of cross-boundary significance arising from the potential impacts of the Local Plan Review. It summarises where agreement has or has not been reached with relevant key partners to which the issue relates.

- 5.2. The cross-boundary impacts of borough policies in neighbouring authorities' local plans will be addressed through separate SCG produced by the relevant local authority.
- 5.3. Each borough's Duty to Co-operate Statement also provides further details of how the Local Plan has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

Housing

Housing Delivery and affordable housing

- 5.4. The delivery of new and affordable housing is one of the largest strategic issues London faces. Through the London Plan and in line with Planning Practice Guidance¹, the Mayor of London sets housing targets for each local planning authority, based on evidence of housing need and development capacity across the capital. Through their own local plans, authorities must then plan to meet or exceed London Plan targets to ensure they are in general conformity with the London Plan.
- 5.5. The analysis in the Local Housing Need Assessment (2020) demonstrates that Wandsworth has an on-going relationship with the boroughs that make up the London South West Sub-Regional housing market, which was as defined in the 2012 Wandsworth Strategic Housing Market Assessment.
- 5.6. Wandsworth's Local Plan will seek to deliver at least 1,950 homes per year (against a target set by the London Plan of 19,500 homes between 2019/20 and 2028/29), and Merton's Local Plan will seek to deliver at least 918 homes per year (9,180 homes over the London Plan period) albeit in a stepped annual target. There is identified capacity to meet this requirement for the first ten years of the Local Plan period for both boroughs. In accordance with the London Plan, the Local Plan identifies a requirement for the entire Plan period and capacity to meet this target, acknowledging that the London Plan target will change once it is updated within around 5 years' time, with these requirements to be included in a future revision to the Local Plan. The Local Plan housing target is lower than the objectively assessed local housing need for both boroughs, however a comprehensive review of land and sites available for development (including large, small and windfall sites) indicated that there is insufficient capacity to meet the objectively assessed local housing need. All options have been thoroughly explored with regards to meeting as much of the objectively assessed housing need as possible, subject to environmental constraints.
- 5.7. All local planning authorities that are part of this SCG have fed into the London Plan figures – either expressing their support or objection to the new figures, based on a localised understanding of development capacity.
 - Wandsworth and Merton agree that they can meet or exceed the total numerical housing target assigned to them by the Mayor of London in the published-London Plan 2021, within their own borders, thus it is not considered that it constitutes a cross-boundary issue.

¹ Paragraph: 034 Reference ID: 2a-034-20191216

- In 2019, during the drafting of the London Plan when the draft London Plan target for Merton proposed as 13,280 homes per decade, Merton asked Wandsworth if it could assist with the housing requirement. Wandsworth stated that it was unable to assist due to insufficient housing capacity. However Merton can now meet its 10 year target within its own borders so this is no longer considered to be a cross boundary issue.

- 5.8. Wandsworth's Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period.
- 5.9. Merton's Strategic Housing Needs Assessment 2019 identifies a need for 878 - 1,084 homes per annum in social / affordable rented sector and a need for 786 - 933 in affordable home ownership sector.
- 5.10. The level of need is significant, and for that reason Wandsworth's proposed affordable housing policy (LP23, Reg.19 version) and Merton's proposed affordable housing policy (H11.1, Reg.19 version) both set the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the London Plan 2021.
- 5.11. Both new Local Plans will seek to deliver a range of housing types, including Build to Rent, housing for students and the elderly. It is not believed that any of these forms of accommodation, or the provision of affordable homes, leads to strategic cross-boundary issues with the neighbouring boroughs.

Gypsies and Travellers

- 5.12. Wandsworth has a long-established Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019) found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will actively explore options to identify an additional site, in accordance with the Policy LP32 (Traveller Accommodation).
- 5.13. This has not been identified as a strategic or cross-boundary issue.

Employment land

- 5.14. **Wandsworth** updated the Employment Land and Premises Study (ELPS) in 2020, which suggests there is demand for office floorspace (22,500 sqm) and industrial and waste land (up to 8.6ha) in excess of supply. It is noted that the ELPS is based on economic forecasting data derived from before the pandemic, and the impact upon changes in work patterns is likely to have a significant impact on office, and other commercial and industrial, floorspace. The Local Plan therefore takes a protective approach.
- 5.15. The draft Wandsworth Local Plan continues the approach of the Local Plan Employment and Industry Document (EID, 2018), in that it distinguishes between two office markets: the CAZ in Nine Elms and the local / sub-regional market in the rest of the borough. It also promotes the concept of the Battersea Design and Technology Quarter (BDTQ), located south of

Battersea Power Station in Queenstown Road / Battersea Strategic Industrial Location (SIL).
In addition:

- In line with London Plan Policy E5, Wandsworth has designated 'Summerstown' as SIL in the draft Local Plan. This area of employment activity straddles the boundary with **Merton**. This replaces the previous designation as a Locally Significant Industrial Area (LSIA); the borough equivalent of the Locally Significant Industrial Sites (LSIS) in the London Plan. **Merton** highlight that it has a high demand for industrial land and plans to protect the SIL sites within the borough, and is therefore supportive of this approach.

Affordable Workspace

- 5.16. Wandsworth's Local Plan includes an affordable workspace policy seeking contributions to affordable, flexible and managed workspace. Developments of over 1,000 sqm must provide either a proportion of 'open workspace' equivalent to 10% of the gross economic floorspace, or a proportion of economic floorspace at an affordable rent below market rent, in perpetuity, subject to scheme viability. This is spatially differentiated between sites in the VNEB Opportunity Area and the remainder of the borough.
- 5.17. This has not been identified as a strategic or cross-boundary issue.

Town centres and retail

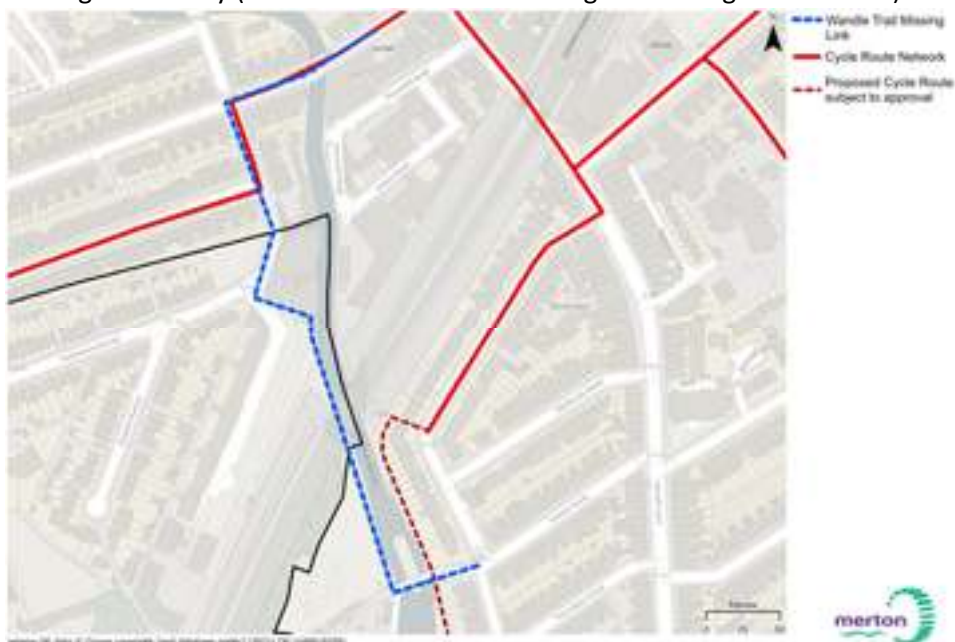
- 5.18. **Wandsworth** updated the Retail Needs Assessment in 2020, and it identifies that there is no clear need to identify or plan for an increase in retail and food / beverage floorspace over the majority (up to 2035) of the Local Plan period. It should be noted that this study was based on data largely dating from before the Coronavirus pandemic.
- 5.19. Both Wandsworth and Merton's Local Plans set out a new approach to retail in response to legislative changes (particularly in respect of the new Class E), both maintain a hierarchical town centre approach as a preferred strategy despite new changes to permitted development from Class E to Class C3 that could undermine both town centres and such an approach. Merton plans to designate Colliers Wood as a district centre, despite it not being recognised as such in the London Plan; this is not considered to impact on Wandsworth's centres.
- 5.20. Wandsworth and Merton recognise the potential for investment in existing centres (Clapham Junction / Tooting or Balham, Wimbledon) if Crossrail 2 is realised.

Transport infrastructure

- 5.21. The Wandsworth Local Plan advocates support for the main ongoing infrastructure projects in the borough, including the Thames Tideway Tunnel and Crossrail 2. Wandsworth is committed to working on these projects with Transport for London and neighbouring boroughs. Two new bridges have been proposed for the Thames, these being the Nine Elms to Pimlico bridge (Wandsworth to Westminster) and the Cremorne (Diamond Jubilee) Bridge (Wandsworth to Hammersmith and Fulham). The Thames Tideway project is due for completion in 2024/2025.
- 5.22. For Crossrail 2, both Merton's and Wandsworth's Local Plans recognise that the project may not come forward during the lifetime of either local plan (having been suspended in

November 2020). Wandsworth's Local Plan therefore incorporates a 'fallback' option, that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale. Tooting is the preferred location for a station on the Crossrail 2 project. This would necessitate the comprehensive redevelopment of Tooting town centre (in particular the area around the current station). The Area Strategy for Tooting emphasises the protection of the area, including the retention (or reprovision) of the markets. Being close to Merton, this is considered a cross-boundary issue and Merton supports it in principle.

- 5.23. Finally, Merton has highlighted an upcoming S106 project with cross boundary implications, noting it would be good to be identified within the Wandsworth Draft Local Plan and for both boroughs to liaise to ensure consistent mapping. This project related to the Wandle Trail, known as the 'missing link', where it deviates from the riverside west of Earlsfield's centre. Wandsworth and Merton officers are already in contact on this.
- 5.24. Merton's Policies Map proposes the following link within the Merton borough boundary and for the purposes of co-operation, has illustrated the route below crossing into Wandsworth's borough boundary (with the black lines indicating the borough boundaries)



Telecommunications and digital infrastructure

- 5.25. Not identified as a strategic or cross-boundary issue with any one specific borough. National Grid is building the London Power Tunnels 2 project, 33km of underground cabling from Wimbledon to Bexley via Wandsworth, Lambeth, Southwark, Lewisham and Greenwich. The project is under construction and National Grid has already compulsory purchased the necessary land. The first circuit from Wimbledon substation in Merton to New Cross in Lewisham is due to be complete in 2025. Although it connects to the large National Grid substation in Merton, the tunnelling work and shafts for the boring machine to exit will be located in Wandsworth within the Garrett Mills business park. Although this is a cross boundary issue, as the project is underway (and underground) it is not considered to raise issues for either Local Plan.

Waste management

- 5.26. Wandsworth has published a Waste Technical Study, (Wandsworth Local Plan Review: Waste Evidence Base, completed in 2020), which is available online. The overall summary position of the report is that waste need, including the borough's apportionment target will be met within the borough through capacity at existing sites and directing new waste facilities to safeguarded industrial areas to make up the shortfall.
- 5.27. A Duty to Cooperate Report on Waste Exports was published in May 2021. The Report provides an audit and analysis of the issues raised during the duty to cooperate engagement on waste exports January – March 2021, which formed part of Wandsworth's draft Local Plan Regulation 18 consultation. Wandsworth has identified sixteen waste planning authorities (or groups of WPAs) who receive 'strategic' amounts of waste exports from the Borough (i.e. an amount of waste over certain thresholds which have been agreed by waste planning authorities across the wider south east). Wandsworth has engaged with each of these authorities, or groups of authorities, to establish if there are any planning reasons why similar waste exports from the Borough cannot continue over the plan period.
- 5.28. As an outcome of this ongoing process, Wandsworth will work towards preparing Statements of Common Ground with each of the WPAs who consider waste exported from Wandsworth to their area to be a strategic issue. This will be completed independently from this SCG, and will include neighbouring Merton and Hammersmith and Fulham, alongside:
- London Borough of Havering
 - Hertfordshire County Council
 - Kent County Council
 - Medway Council
 - Old Oak and Park Royal Development Corporation
 - Surrey County Council
 - Thurrock Council
- 5.29. Together with the neighbouring boroughs of Croydon, Kingston upon Thames and Sutton, Merton prepared and adopted the joint development plan document, the South London Waste Plan in 2012 and have nearly finalised its review, the South London Waste Plan 2022. The South London Waste Plan 2022 was submitted to the Secretary of State in February 2021, the public hearing element of the examination in public was held in September 2021 and at the time of writing the four boroughs are preparing for a seven week public consultation on the post hearing modifications. Duty to co-operate on waste planning matters was considered as part of the preparation of the South London Waste Plan 2022

Water supply and wastewater management

- 5.30. Wandsworth continues to support the implementation of the Thames Tideway Tunnel, alongside neighbouring authorities. No strategic or cross borough issues have been identified with Wandsworth and Merton.

Climate change adaptation, particularly flood risk

- 5.31. Merton and Wandsworth have a shared strategic flood risk assessment as identified above. Both boroughs are committed to continuing this joint work.

Climate change mitigation

- 5.32. Wandsworth and Merton, like many, declared a Climate Change Emergency in 2019, and in response has developed the Wandsworth Energy and Sustainability Strategy (WESS) and Action Plan and the Merton Climate Strategy and Action Plan. Both are cross-cutting strategies on addressing climate change – which focuses both on internal and external actions, including carbon neutrality as an organisation by 2030 and zero carbon by 2050.
- 5.33. Merton is introducing carbon offset targets for minor developments whereas Wandsworth has followed the targets identified in the London Plan.

Energy infrastructure

- 5.34. Wandsworth's Draft Local Plan continues to promote decentralised energy networks. There are two networks within Nine Elms: the Embassy Quarter Heating Network (EQHN) and the Battersea Power Station Heating Network. These have a relationship with both Lambeth and Westminster, though this issue is not identified as a strategic or cross-boundary issue with Merton and Wandsworth.

Provision of minerals

- 5.35. Not identified as a strategic or cross-boundary issue between Merton and Wandsworth.

Health care

- 5.36. The NHS South West London Clinical Commissioning Group is responsible for planning, commissioning and buying health services for people living and working in south west London. The CCG serves around 1.5 million people living within the six boroughs of Wandsworth, Kingston, Merton, Richmond, Sutton and Croydon. The CCG is responsible for primary care (the services received at a GP practice), hospital treatment, rehabilitation services, urgent and emergency care, community health services, mental health and learning disability services. Strategic cooperation already takes place.
- 5.37. Wandsworth is in the process of updating the Infrastructure Delivery Plan (IDP), which will be published alongside the Regulation 19 version of the Local Plan. The borough can meet its projected health needs. A new Health Centre at Sleaford Street, secured as part of Battersea Power Station Phase 4a and funding agreement with NHS Property Services, will provide new primary health care facilities to support the predicted new population of c.34,700 and the existing residents, thereby contributing to the health and well-being of local communities. In addition, the Council will work in partnership with the NHS to deliver additional health care at Nine Elms Square (see Local Plan policy PM3).
- 5.38. Merton Council has published its Infrastructure Delivery Plan 2022, which is informed by the NHS CCG Merton Borough Estates Strategy. This sets out the projected health needs in Merton. As stated above, Merton and Wandsworth share the NHS South West London CCG with four other boroughs

Schools and education

- 5.39. The greatest pressure on educational provision in Wandsworth is in Queenstown ward in the north east of the borough. Here, the Wandsworth Local Plan commits to bringing forward a new two-form entry primary school at the identified site of Plot C1, Nine Elms Parkside in time to meet the need arising from development and ensure the provision is made for

potential expansion in future years. The new school in Nine Elms is being developed in partnership with Lambeth and is not identified as a strategic or cross-boundary issue. Beyond this additional provision, Wandsworth considers itself able to meet its school needs without further school development.

- 5.40. Merton has planned for increased school places and in addition to the expansion of primary schools that took place from 2007 to 2015, a new secondary school was opened in 2018 (Harris Wimbledon) and in 2020 moved to its new site in South Wimbledon. As identified in Merton's Infrastructure Delivery Plan, there is an increasing need for school places for children with additional needs; Merton Council has expanded the existing special needs school at Cricket Green and proposes additional places at Whatley Avenue towards the west of the borough.
- 5.41. There is school places movement across borough boundaries but this issue is not identified as a strategic or cross-boundary issue beyond what is referred to above.

Community and cultural infrastructure

- 5.42. Wandsworth has adopted a borough-wide Arts and Culture Strategy and its aims and objectives have been incorporated into the Local Plan. This is written to complement other arts and cultural initiatives around Wandsworth's neighbourhoods, including in the Vauxhall, Nine Elms and Battersea area (where there is an existing area Cultural Strategy) and the GLA / Port of London Authority River Thames Cultural Vision.
- 5.43. Merton Council has published a number of strategies to promote different aspects of community and cultural infrastructure including Merton's Community Plan 2020-2026 (with partners) and Merton's Heritage Strategy 2021-2025
- 5.44. This has not been identified as a strategic or cross-boundary issue.

Natural environment and green infrastructure

- 5.45. Wandsworth has undertaken an update of the borough's Open Space Strategy. The study provides the basis for the protective approach taken in the Wandsworth Local Plan.
- 5.46. The Local Plan also incorporates an Urban Greening Factor (UGF), which relies on the values established in the adopted London Plan, rather than a local formula (see Policy G5 of the London Plan and LP57 of the Wandsworth Local Plan). Policy LP57 commits to keeping this under review.
- 5.47. Merton has published an Open Space and Green Infrastructure Study 2020 which has informed the Local Plan policies, site designations and Policies Map amendments
- 5.48. Between Merton and Wandsworth, the proposed expansion of the All England Lawn Tennis Club into the adjacent Wimbledon Park (mostly located in Merton and a site allocation Wi3 in Merton's Local Plan, partly located in Wandsworth) presents shared issues for the two boroughs in respect of the holding of the annual Championships, heritage, travel and open space issues. This is being dealt with through the planning application process and a cross-boundary planning application has been submitted to both boroughs in their roles as Local Planning Authorities as the development straddles the borough boundary (reference 21/P2900 in Merton; reference 2021/3609 in Wandsworth).

- 5.49. Wandsworth Council considers that Merton's proposed site allocation Wi3 will need to ensure that it complies with the NPPF, in that it is recognised that the allocation is on land designated as Metropolitan Open Land (MOL) within which development may only occur by exception and subject to the demonstration of 'very special circumstances' to clearly outweigh any harm to MOL and any other harm. Whilst outdoor sport may be appropriate development (NPPF 2021, para 149) this is only providing the facilities do not impact on openness and the purposes of land being designated as MOL. To address this, Merton will propose amendments to the text within Site Allocation Wi3 of the Stage 3 Reg. 19 Plan (July 2021) as part of the examination process. Paragraph 7 of the Site Description (stating, 'The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations') will be moved to the Design and Accessibility Guidance section.
- 5.50. Wimbledon and Putney Common in Merton and Wandsworth borders Kingston, and it is recognised that there is scope for cross-borough alignment. In Wandsworth and Merton, the approach to the protection and enhancement for these types of open space has not changed and the findings from each borough's Open Space Study and the Playing Pitch Strategy can be shared upon request for Wandsworth and are available online in Merton. Both boroughs agree to continue supporting green links and green chains that cross over the boundary.

Historic environment

- 5.51. The Wandsworth Local Plan Policy LP3 (The Historic Environment) seeks to conserve and enhance the significance, character and appearance of the borough's historic environment.
- 5.52. Whilst there are a number of shared assets of heritage and conservation importance between Wandsworth and Merton (see section 4, above and section 5 reference to the All England Lawn Tennis Club planning application at Wimbledon Park), this has not been identified as a strategic or cross-boundary issue.

Tall buildings and built environment

- 5.53. Wandsworth Council has undertaken an Urban Design Study (UDS), to develop a better understanding of the values, character and sensitivity of different parts of the borough and to enable a design-led approach to housing capacity on allocated sites. As part of the work, an assessment of the scope for, and impact of, tall buildings has been undertaken which will both ensure compliance with London Plan policy and contribute to the understanding of the capacity of such buildings to meet development needs. Tall buildings clearly have an impact on the built environment both locally and more strategically, dependent on where they are located. The tall building policy identifies a local definition for tall and mid-rise buildings (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate.
- 5.54. The work on the approach to tall buildings has been concluded between the consultation on the Regulation 18 plan, and the publication of the Regulation 19 plan, and has been completed to inform the latter. The assessment of character and sensitivity, alongside an assessment of the likelihood for change and the availability of opportunity gives rise to a

composite map which sets out those areas where tall buildings could be acceptable, and more detailed work within each of these areas begins to map out heights that might be appropriate.

- 5.55. The strategy for tall buildings focuses on the Nine Elms Opportunity Area, the five town centres (Balham, Clapham Junction, Putney, Tooting and Wandsworth), the River Thames frontage through Wandsworth and Battersea and known areas with emerging masterplans or major planning applications. The principal issues for neighbouring boroughs will occur along the River Thames (particularly in respect of key views and riverside impact) and at VNEB. In this respect, Hammersmith and Fulham, Kensington and Chelsea, Westminster and Lambeth are likely to have the greater interest in policy direction; for Merton, Richmond and Kingston, the possible impact is less immediate.
- 5.56. Likewise, several locations along Wandsworth's boundaries with Lambeth, Merton and Richmond have been identified as zones appropriate for tall and mid-rise buildings.. Although, tall buildings in these locations are likely to impact on views from these boroughs, it is not considered that the impact would be unacceptable given that proposals will need to comply with the criteria set out in the policy. These authorities have highlighted that they would consider the tall buildings policies as part of the Local Plan consultation, in which neither borough made further comments.
- 5.57. Merton has undertaken a borough character study 2021 which includes a chapter on taller buildings and has informed Merton's strategy for taller buildings, as set out in Merton's Local Plan. Taller buildings in Merton are permitted in specific parts of Colliers Wood, Morden and Wimbledon town centres and on specific site allocations. In all other cases Merton follows the London Plan 2021 approach of defining taller buildings as no taller than 6 storeys across the rest of the borough. The GLA's response to Regulation 19 of Merton's Local Plan proposed some amendments to ensure this was clear in both the policies and on maps in order to bring Merton's draft Local Plan into line with the London Plan 2021.

6. Governance arrangements

- 6.1. Requirements for signing documents differ between Local Authorities depending on their structure. It will be for each body to decide who is the appropriate person to sign the statement.

7. Timetable for agreement, review, and update

- 7.1. This statement has been informed by on-going engagement between the parties and has been informed by various evidence base documents. In addition to Duty to Cooperate meetings, the Council also regularly partakes in the Association of London Borough Planning Officer (ALBPO) meetings.
- 7.2. This SCG is a live document and will be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.
- 7.3. As this statement focuses on issues of relevance to Wandsworth's Draft Local Plan, post examination will only need further updating once work commences on any future revisions

to the Local Plan. Ongoing collaboration between partners will continue through regular meetings on a one to one basis and through attendance at group meetings where cross boundary issues are discussed.

Statement of Common Ground – Merton and Croydon Councils

Introduction

1. A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Merton's and Croydon's Regulation 19 Local Plans are '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.
2. This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them. It also forms part of the evidence demonstrating compliance with the 'duty to cooperate'. In the London context, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.
3. This statement of common ground between Merton and Croydon demonstrates how effective and on-going joint working has informed strategic policy-making through the whole review of Merton's Local Plan ([submitted December 2021](#)) and the partial review of Croydon's Local Plan which at the time of writing had reached the ([Regulation 19 publication January – February 2022](#)) stage, to meet the requirements of the Duty to Cooperate.
4. In this statement the parties involved are:
 - London Borough of Croydon (Croydon)
 - London Borough of Merton (Merton)

Strategic Geography

5. The map below shows the geographical relationship between the boroughs as well as the South London Waste Plan (joint DPD) authorities.



6. Croydon and Merton are both outer London boroughs as defined in the London planning process (Annex 2 of the 2021 London Plan). They both have boundaries to Sutton Council and in addition:
 - Croydon has a boundary to the south to Surrey and the local planning authorities of Surrey County Council, Mole Valley, Reigate & Banstead and Tandridge.
 - Merton has a boundary to the Royal Borough of Kingston-upon-Thames, London boroughs of Wandsworth and Lambeth.

Strategic co-operation

Pan London work

7. Within the wider London context, collaboration on many strategic issues that go beyond borough boundaries occurs through the preparation and monitoring of the Spatial Development Strategy for London; currently the London Plan 2021.
8. The London Plan is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. The current plan was adopted in March 2021. Every London borough's local plan must be in general conformity with the published London Plan.
9. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans, once made. In a London context, collaboration on many strategic issues – such as the distribution of housing, identification of major growth areas, strategic infrastructure etc – are largely addressed through the London Plan, and the formal and informal arrangements that exist between boroughs to enable this to happen.
10. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy.
11. TfL runs the day-to-day operation of the city's public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's rail infrastructure.
12. The All London Green Grid (ALGG) partnership is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations. ALGG aims to promote and protect green and blue infrastructure (including rivers) in London and divides London into 11 Green Grid areas. The Wandle Valley Green Grid area covers parts of Merton, Croydon, Sutton and Wandsworth. Merton is also covered by the Arcadian Thames area (shared with other boroughs including Kingston, Richmond and Wandsworth) and Croydon also contains the London's Downlands area (shared with

other boroughs including Bromley and Sutton). Within Croydon there is the recently created South London National Nature Reserve.

13. Thames Water is the statutory water and sewerage undertaker for Merton, Wandsworth as well as Croydon and is hence a specific consultation body in accordance with the Town & Country Planning (Local Development) Regulations 2012. In Merton and Croydon, Sutton and East Surrey Water is also a statutory water and sewerage undertaker.
14. An extensive network of formal and informal routes for co-operation exists which Merton and Croydon participate in on plan-making issues. These include:
 - Working with the Greater London Authority on evidence and consultation for the London Plan. This includes contribution to the pan-London Strategic Housing Land Availability Assessments
 - Continuous monitoring of all residential development in London and other types of commercial and strategic development via the London Development Database
 - Creating and delivering the Local Implementation Plans for the Mayor's Transport Strategy
 - Participating in opportunities for co-ordination and co-operation such as the Association of London Borough's Planning Officers, Urban Design London, London Councils
 - Merton and Croydon are both part of the South London Partnership of five south London boroughs working together on joint strategies and projects to promote south London's economy, infrastructure and living.
 - Delivering infrastructure jointly, for example working with Transport for London on maintaining and improving the tram services from Croydon to Wimbledon, working together as part of the South London Waste Partnership (Merton, Croydon, Sutton and Kingston).

Strategic planning issues considered

15. The two local authorities have identified and agreed that across their two boroughs there are strategic planning issues that need to be addressed through the duty to cooperate. These strategic planning matters are:
 - Delivering housing need for the housing market area (including Gypsy and Traveller needs)
 - The economy including town centres
 - Infrastructure provision
 - Flood risk
 - Waste management

16. These strategic matters are set out in turn below with ongoing actions and whether there is agreement on these at the publication date of this Statement of Common Ground.

Opportunity areas

17. The London Plan identifies areas that will see the most significant change. These are known as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs. Policy SD.1 Opportunity Area in the London Plan 2021 sets out the opportunity areas for London, including for Merton and Croydon.

18. The London Plan 2021 identifies the *Trams Triangle Opportunity Area* referencing Croydon, Sutton and Wimbledon and ascribing Croydon with an indicative target for new homes of 14,500 to 2041 and for jobs of 10,500. Croydon has already adopted an Opportunity Area Planning Framework and defined boundary for the Croydon Opportunity Area in their adopted Policies Map and intend to take this forward unchanged in the revised Local Plan and Policies Map .

19. While the Trams Triangle Opportunity Area does not ascribe homes or jobs targets for Merton, the London Plan policy SD1 provides Merton with the *Wimbledon – South Wimbledon – Colliers Wood Opportunity Area* ascribes indicative targets to Merton of 5,000 homes and 6,000 jobs in the Opportunity Area by 2041. Both Merton’s and Croydon’s Regulation 19 Local Plans propose, or in the case of Croydon maintains, Opportunity Area boundaries for their respective Opportunity Areas which are set out below.



Fig 2: Croydon’s Opportunity Area boundary

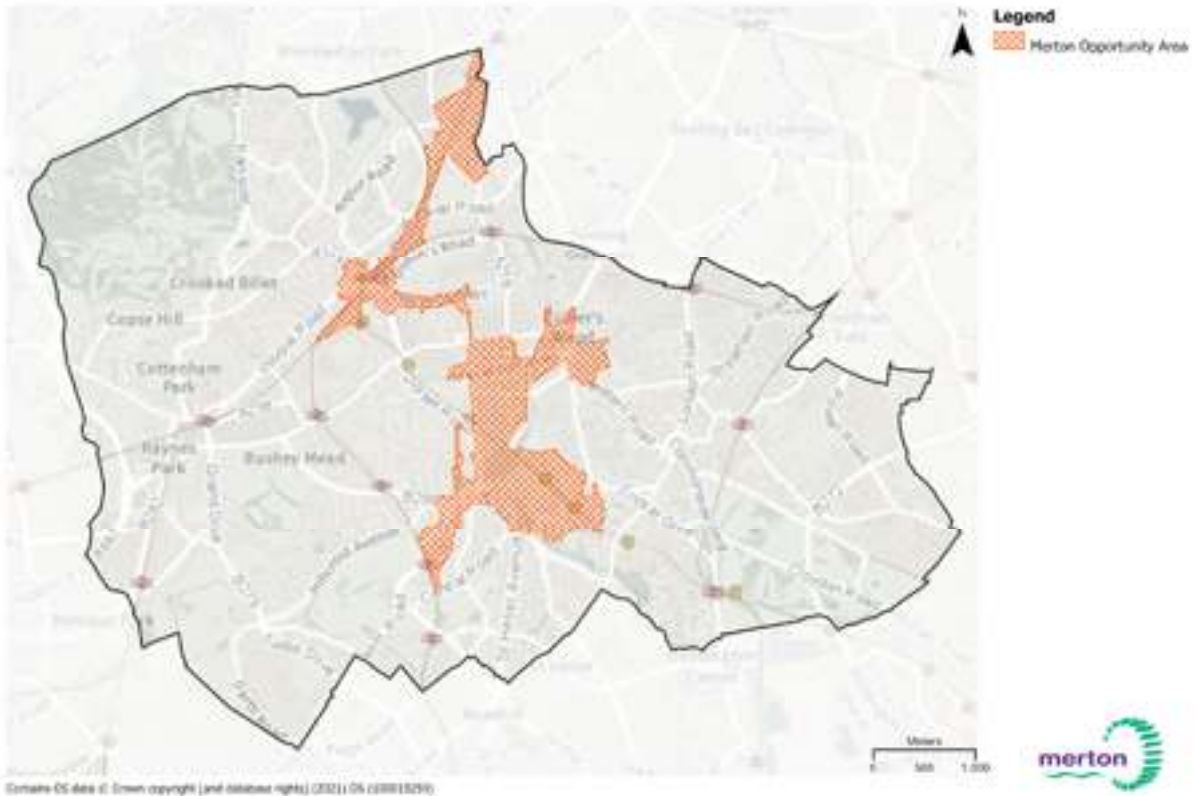


Fig 3: Proposed boundaries of the Wimbledon-South Wimbledon-Colliers Wood Opportunity area in Merton

Agreed Action

Both boroughs agree that, due to the separate boundaries of their proposed Opportunity Areas, there are no strategic cross boundary issues identified.

Strategic Areas for Regeneration

20. As outlined by London Plan policy SD10, there are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. The London Plan identifies these neighbourhoods as Strategic Areas for Regeneration (SARS).

21. The London Plan 2021 identifies Strategic Areas for Regeneration in Merton around the Phipps Bridge, Pollards Hill and Mitcham town centre, although these are some distance from the boundaries between the two boroughs. Cross boundary issues are not identified.

Neighbourhood Planning

22. An application for a neighbourhood forum area in Wimbledon (Merton) was refused in July 2021 but is likely to emerge again. This area would have had a boundary with Wandsworth.

There are no other designated Neighbourhood Areas or Forums in Croydon. However, no cross boundary issues are identified.

Housing Market Area

23. Whilst Greater London is considered to be the strategic housing market area for the purposes of the London Plan and its SHLAA, the more detailed assessment at a local level identifies five sub-regional areas (North, East, West, South and Central). Merton and Croydon are identified within the South area along with Kingston, Wandsworth, Richmond and Sutton

Housing delivery and affordable housing

24. The delivery of new and affordable housing is one of the largest strategic issues London faces. Through the London Plan 2021 and in line with Planning Practice Guidance, the Mayor of London sets housing targets for each local planning authority, based on evidence of housing need and development capacity across the capital. Through their own local plans, authorities must then plan to meet or exceed London Plan targets to ensure they are in general conformity with the London Plan.

25. Merton, Croydon and all other London borough local planning authorities have fed into the London Plan figures – either expressing their support or objection to the new figures, based on a localised understanding of development capacity.

- Merton and Croydon agree that they can meet or exceed the total numerical housing target assigned to them by the Mayor of London in the published-London Plan 2021, within their own borders, thus it is not considered that it constitutes a cross-boundary issue.
- In 2019, during the drafting of the London Plan when the draft London Plan target for Merton proposed as 13,280 homes per decade, Merton asked Croydon if could assist with helping to meet its housing requirement. Croydon stated that it was unable to assist due to insufficient housing capacity. However, since then the London Plan 2021 has been published with a target of 9,180 homes per decade for Merton. Merton can now meet this 10 year target within its own borders so this is no longer considered to be a cross boundary issue.

Croydon

26. The current housing target in the Croydon Local Plan adopted 2018 (CLP18) plans for 32,890 homes over the plan period. This was based on an estimated need in 2015 for 44,149 homes which due to limited developable land it was not considered possible to deliver the full need. The 2021 London Plan development strategy is based on the concept of sustainable intensification making much more efficient use of land and

focusing growth on well-connected locations. The housing target for Croydon is now higher than the adopted CLP18 reflecting the new emphasis that the contribution outer London can play in delivering housing. However, the approach set out in the 2021 London Plan recognises that every borough needs to play its part if London is to meet its overall housing need.

27. To inform the development of appropriate housing policies in the review of the Local Plan Croydon produced an updated Strategic Housing Market Assessment (SHMA)¹. Using the government standard methodology as well as the housing target in the draft 2021 London Plan the SHMA indicated a requirement from 2016 to 2036 for 2,302 homes per year. However, as the London Plan has since been adopted sets a minimum target of 2,079pa for 2019 to 2029 how the specific requirements of housing need such as affordability, tenure and mix would need to be delivered based on these targets has been considered.

Merton

28. The 2021 London Plan sets Merton's share of London's new homes at 918 new homes per year, up from 411 homes in the 2016 London Plan, an increase of over 200%. To inform Merton's emerging 2021 Local Plan and support the delivery of new homes, recognising the substantial increase in Merton's housing target, LBM has produced the following evidence, [all of which is available on Merton's website](#)

- Strategic Housing Market Assessment 2019
- Housing viability study 2020
- Merton's housing delivery study 2021

29. Croydon's Local Housing Need Assessment (SHMAA) identifies a net need for affordable homes that exceeds the housing target proposed in the revised Local Plan. However, following the Whole Plan Viability Study the revised Local Plan set out a strategic target for 40% (or 831 dpa) of all additional housing delivered is affordable to low income groups during the life of the Plan.

30. Merton's Strategic Housing Needs Assessment 2019 identifies a need for 878 - 1,084 homes per annum in social / affordable rented sector and a need for 786 - 933 in affordable home ownership sector.

31. The level of need is significant, and for that reason Croydon's proposed affordable housing policy (SP2, revised Local Plan Reg.19 version) and Merton's proposed affordable housing policy (H11.1, Reg.19 version) both set the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the London Plan 2021.

32. Both the new Merton Local Plan and the revised Croydon Local Plan contain policies that will support the delivery of a range of housing types, including housing for

¹ [Strategic Housing Market Assessment \(SHMA\) August 2019](#)

students and the elderly. It is not considered that any of these forms of accommodation, or the provision of affordable homes, leads to strategic cross-boundary issues with the neighbouring boroughs.

Gypsies and Travellers

33. Merton's established traveller site is located in north Wimbledon, on the border with Wandsworth. Croydon's established traveller site is located at Lathams Way. Both boroughs have carried out research to inform their gypsy and traveller needs assessments, in accordance with the national policy. As both boroughs can meet needs identified within their boundaries, this has not been identified as a strategic or cross-boundary issue. As Croydon are undertaking a partial review and there are sufficient allocated sites to meet needs the Gypsy and Travellers, these policies and allocations were not subject to the Croydon Local Plan review currently at Reg 19.

The Economy

34. The London Plan 2021 contains the strategic policies which designate Strategic Industrial Locations and town centre designations (from International to District Centres for all London boroughs.
35. The adopted CLP18 sets out in accordance with paragraph 20 of the NPPF the approach to the provision of land for industry and warehousing up to 2036. This adopts a 4 Tier approach which includes continued protection to support employment sectors in the borough as well as the redevelopment of employment land to meet future needs. The revised Local Plan takes a similar strategic approach and plans up to 2039.
36. Merton's Local Plan review proposes a similar approach to protect employment land and enable redevelopment to meet future needs.
37. To support the economy the approach to office space in accordance with the London Plan the CLP18 and the revised Croydon Local Plan seeks to protect and direct office development to the central Croydon area. In Merton, Wimbledon is the borough's only major town centre and is attractive to the office market. As these two locations are geographically distant, the planned growth would not have impact on either and there are no strategic cross boundary issues identified from this approach.
38. Both Merton and Croydon contain policies to protect their Strategic Industrial Locations as prescribed in the London Plan 2021. While both boroughs acknowledge the industrial heritage of the Wandle Valley in their respective local plans, Merton and Wandsworth's Strategic Industrial Locations are geographically distinct, joined by their connection with the London Borough of Sutton. The joint preparation of the South London Waste Plan Development Plan Document (together with Kingston and Sutton) has reviewed each borough's SILs where there is capacity for waste uses. There are no strategic cross boundary issues from this approach.

Town and Local Centres

39. The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them.
40. The Merton Reg 19 Local Plan identifies one Major Centre (Wimbledon), three District Centres (Colliers Wood, Mitcham and Morden) and local centres and neighbourhood parades. Colliers Wood is proposed as a new District Centre in Merton's Local Plan. There are not considered to be any cross boundary issues arising from this proposal.
41. The Croydon Reg 19 Local Plan still reflects the strategy in the CLP18 and identifies one Metropolitan Centre (Croydon), nine District Centres (Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, Purley, Selsdon, South Norwood and Thornton Heath – and beneath this it also identifies local centres and important local parades within the borough (three new Local Centres are proposed at Five Ways, Waddon Marsh and Valley Park through the review of the Local Plan to serve the Purley Way transformation area).
42. Between boroughs, town centres and parades can be shared by virtue of them crossing the borough boundary. There no instances of this between Merton and Croydon.

Agreement;

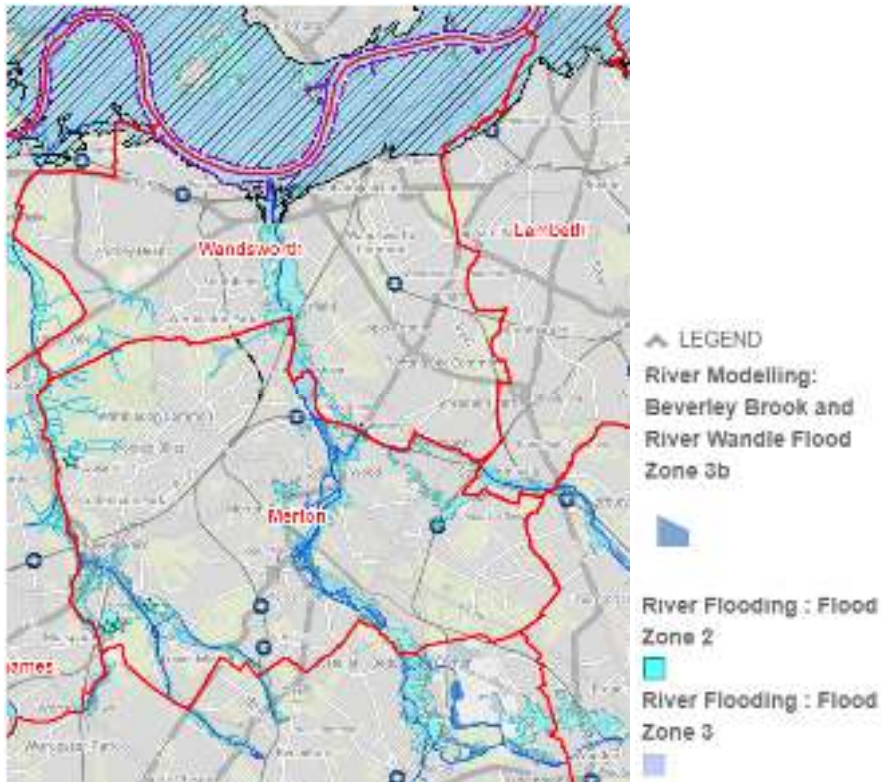
No strategic cross boundary issues are identified.

Climate change

43. Both Merton and Croydon councils declared climate emergencies in 2019. Merton Council adopted its Climate Strategy and Action Plan in late 2020, setting a council target for net zero by 2030 and a borough-wide target by 2050. Merton has since adopted its second year of climate actions (February 2022)
44. Croydon has set up the Croydon Climate Crisis Commission to guide our response to the climate emergency. In June 2021 they produced a report of recommendations that will enable the borough to become carbon neutral by 2030. In addition to this, Croydon has also adopted a [Carbon Action Plan](#) which had been approved at February 2022 cabinet meeting.
45. Both Local Plans contain policies towards achieving net zero, reducing energy and water consumption, using renewable energy and supporting the circular economy. There are no strategic cross boundary conflicts between each borough.

Flood risk

46. The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance for Flood Risk and Coastal Change (PPG) set out the active role Local Planning Authorities should take to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process. The NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and Local Planning Authorities should use the findings to inform strategic land use planning.
47. As the river Wandle runs from its source in Croydon through Sutton and Merton to its mouth joining the river Thames in Wandsworth, in [2015 and 2016 the four councils produced a joint Strategic Flood Risk Assessment covering the Wandle catchment](#).
48. Since then Merton and Wandsworth Councils have produced [an updated joint Level 1 \(November 2020\) and Level 2 \(February 2021\) Strategic Flood Risk Assessment \(SFRA\)](#).
49. The Level 1 Merton and Wandsworth SFRA has collated and analysed the most up to date available flood risk data for all sources of flooding to provide an overview of flood risk across the study area. This has been used by both councils to inform the preparation of their Local Plans, including the application of the Sequential Test to site allocations.
50. The key updates to this revised Merton and Wandsworth Level 1 SFRA (2020) include:
- River Wandle Climate Change Modelling (August 2017)
 - Online Flood Risk Mapping (to Support the Level 1 SFRA)
 - Areas at risk of perched groundwater
 - Further commentary on areas to safeguard for flood risk management, the cumulative impact of development, and opportunities to reduce the causes and impacts of flooding.
51. There are three fluvial flood zones as defined by the Environment Agency (EA): Flood Zone 1, 2 and 3. These areas have been defined following a national scale modelling project for the EA and are regularly updated using recorded flood extents and local detailed modelling. The flood zones are based on the likelihood of an area flooding, with Flood Zone 1 areas least likely to flood and Flood Zone 3 areas more likely to flood. The map below shows the flood extents that cross adjoining boundaries.



52. Croydon updated their [Level 1 Strategic Flood Risk Assessment in 2021](#)

53. Merton and Croydon Councils will continue to liaise on the scope and timing of strategic flood risk assessments, particularly regarding the Wandle catchment. Both Local Plans (Regulation 19) contain similar policies to minimise flood risk from all sources. No additional strategic cross boundary issues have been identified.

Infrastructure provision

54. Merton Council has published its [Infrastructure Delivery Plan 2021](#) to inform the Local Plan submission. It identifies the strategic infrastructure requirements necessary to support the anticipated homes and jobs in Merton over the next 15 years, including consideration of transport, health, education, green and blue infrastructure, sport and leisure, community, utilities, climate change, economic development and emergency services.

55. The current CLP18 and the revised Local Plan plans for the provision of sufficient infrastructure to meet all development needs over the plan period. Updated studies and the [Infrastructure Delivery Plan](#) support the additional development planned for Croydon in the revised Local Plan.

Transport

56. *Roads* There are no London distributor roads or roads on the TfL road network that join Merton and Croydon. The A236 (local road) joins Mitcham (Merton) with Thornton Road and Croydon town centre (Croydon). This supports cycling and a number of bus routes between Merton (particularly Mitcham) and Croydon town centre.
57. *Rail National* Rail services run via Merton and Croydon.
58. *Trams* The south London tram network, particularly the Wimbledon to Croydon route, crosses the boundaries of the two boroughs. As already stated, Transport for London is the transport authority and both boroughs work with each other and with TfL on maintenance and improvements of the tram infrastructure.
59. Both boroughs produce and implement a Local Implementation Plan (LIP) to deliver the Mayor's Transport Strategy and collaborate with other boroughs and Transport for London on this. No additional strategic cross boundary issues are identified.

Healthcare infrastructure

60. The NHS South West London Clinical Commissioning Group is responsible for planning, commissioning and buying health services for people living and working in south west London. The CCG serves around 1.5 million people living within the six boroughs of Wandsworth, Kingston, Merton, Richmond, Sutton and Croydon. The CCG is responsible for primary care (the services received at a GP practice), hospital treatment, rehabilitation services, urgent and emergency care, community health services, mental health and learning disability services.

Merton Infrastructure Delivery Plan 2022, which is informed by the NHS CCG Merton Borough Estates Strategy, sets out the projected health needs in Merton. Croydon's Planning and Regeneration is represented at the Croydon Health Care Estates Programme Board Meeting which is reflected in Croydon Infrastructure Delivery Plan 2021.

61. Strategic cooperation already takes place via the CCG.

Education

62. Merton has planned for increased school places and in addition to the expansion of primary schools that took place from 2007 to 2015, a new secondary school was opened in 2018 (Harris Wimbledon) and in 2020 moved to its new site in South Wimbledon. As identified in Merton's Infrastructure Delivery Plan, there is an increasing need for school places for children with additional needs; Merton Council has expanded the existing special needs school at Cricket Green and proposes additional places at Whatley Avenue towards the west of the borough.

63. The latest pupil projections indicate that there are sufficient primary school places across the majority of the borough to accommodate the planned growth up until 2026. Projections suggest that two new primary schools may be required, one to serve the Croydon Opportunity Area and another in the Purley/ Coulsdon area after 2026. Two sites have already been allocated in CLP18 to meet this projected need; Allocation 201 and Allocation 490. Any long-term future need for primary school places in the south of the borough will be taken into account in the next review of the Local Plan. Currently, the growth in the Purley Way Transformation Area is not projected to create a need for additional primary school places due to over-capacity within the existing schools in the area. The majority of the planned housing developments in the Purley Way Transformation Area are due to be delivered after 2026. To safeguard against a future rise in demand for primary school places, a site has been allocated in the Purley Way Transformation Area for a new 2FE primary school.
64. Pupil projections suggest that the borough currently has enough secondary school places to meet the demand from the proposed housing numbers for the next 5-10 years. Any additional need for secondary school places in the south of the borough will be accommodated in the existing allocated school site at Heath Clark and the existing site on Duppas Hill where St. Andrews CE High School was located.
65. There is school places movement across borough boundaries but this issue is not identified as a strategic or cross-boundary issue beyond what is referred to above.

Natural environment and green infrastructure

66. Merton has published an Open Space and Green Infrastructure Study 2020 which has informed the Local Plan policies, site designations and Policies Map amendments. Merton has also undertaken and published a Playing Pitch Strategy (adopted 2019) and Indoor Sports Needs Assessment (2020); all of which can be found on [Merton's website](#).
67. Croydon undertook work on green spaces and green infrastructure as part of the Croydon Local plan which was supported by evidence. For this reason the scope of the review of the Local Plan did not require this topic to be reviewed beyond supporting increased housing development and addressing climate change.
68. As already mentioned, both boroughs are part of the Wandle Valley and support the All London Green Grid Wandle Valley area and the Wandle Valley Regional Park via their Regulation 19 Local Plan policies
69. Both boroughs are continuing the policy position to protect open space and are maintaining their adjoining Metropolitan Open Land designations (Merton for Mitcham Common; Croydon for Croydon Cemetery). Following a review of evidence, policies and policies map designations for the natural environment, open space and green infrastructure there are no cross boundary issues identified.

Energy infrastructure, minerals, community and cultural infrastructure, tall buildings and the historic environment

70. Following a review of each borough's local plan policies on the issues listed above, no strategic cross boundary issues have been identified.

Waste management

71. Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In their role as Local Planning authorities the four boroughs have planned for waste collaboratively since 2007. The four boroughs produced a joint Development Plan Document (DPD); the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. The four boroughs are revising the South London Waste Plan, joint planning has taken place and the South London Waste Plan examination is currently underway, with the hearings having taken place in September 2021. Once adopted, the new South London Waste Plan will now cover the planning period 2022 to 2038.
72. Additionally, representations were made to the emerging London plan and a joint Statement of Case from the four boroughs was produced for the examination into the London Plan, which was then adopted in 2021.
73. Both Merton and Croydon Regulation 19 Local Plans contain strategic waste planning policies that reference the South London Waste Plan. Cross boundary considerations are taking place via the joint Development Plan document.

Governance arrangements

74. It will be for each local authority to decide who is the appropriate person to sign the statement.

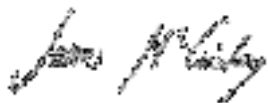
Timetable for review and ongoing cooperation

75. This statement has been informed by on-going engagement between the parties and has been informed by various evidence base documents. In addition to Duty to Cooperate meetings (the most recent between Merton and Croydon took place in October 2021), the Merton and Croydon planning officers are in weekly contact regarding the South London Waste Plan joint development plan document. Both councils are in contact with each other for specific enquiries and also co-ordinate with each other and other boroughs via Urban Design London, London Councils and in the Association of London Borough Planning Officer (ALBPO) meetings.
76. As this statement focuses on issues of relevance to each borough's Regulation 19 Local Plans, post examinations work commences on any future revisions to the Local Plan.

Ongoing collaboration between partners will continue through regular meetings on a one to one basis and through attendance at group meetings where cross boundary issues are discussed.

London Borough of Merton.

Signed: James McGinlay



Position: Assistant Director, Sustainable Communities, London Borough of Merton

Date: 11th February 2022

London Borough of Croydon

Signed:



Position:

Steve Dennington

Service Head - Spatial Planning & Interim Service Head of Growth Zone and Regeneration

Date: 18/02/22

Statement of Common Ground – Merton and Sutton Councils

Introduction

1. A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Merton's (Regulation 19 Local Plan and Sutton's adopted Local Plan are '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.
2. This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them. It also forms part of the evidence demonstrating compliance with the 'duty to cooperate'. In the London context, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.
3. This statement of common ground between the London Boroughs of Merton and Sutton demonstrates how effective and on-going joint working has informed strategic policy-making through the review of Merton's Local Plan ([submitted December 2021](#)) and Sutton's Local Plan ([adopted in 2018](#)) to meet the requirements of the Duty to Cooperate.
4. In this statement the parties involved are;
 - London Borough of Merton
 - London Borough of Sutton

Strategic geography

5. The map below shows the geographical relationship between the boroughs as well as the South London Waste Plan (joint DPD) authorities.



6. Sutton and Merton are both outer London boroughs as defined in the London planning process (Annex 2 of the 2021 London Plan). They both have boundaries to Croydon Council and the Royal borough of Kingston upon Thames and in addition:
 - Sutton has a boundary to the south to Surrey and the local planning authorities of Surrey County Council, Epsom & Ewell and Reigate & Banstead.
 - Merton has a boundary to the Royal Borough of Kingston-upon-Thames, London boroughs of Wandsworth and Lambeth.

Strategic co-operation

Pan London work

7. Within the wider London context, collaboration on many strategic issues that go beyond borough boundaries occurs through the preparation and monitoring of the Spatial Development Strategy for London; currently the London Plan 2021.
8. The [London Plan](#) is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. The current plan was adopted in March 2021. Every London borough's local plan must be in general conformity with the published London Plan.
9. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans, once made. In a London context, collaboration on many strategic issues – such as the distribution of housing, identification of major growth areas, strategic infrastructure etc – are largely addressed through the London Plan, and the formal and informal arrangements that exist between boroughs to enable this to happen.
10. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the [Mayor's Transport Strategy \(2018\)](#). The boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy.
11. TfL runs the day-to-day operation of the city's public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's rail infrastructure.
12. The [All London Green Grid](#) (ALGG) partnership is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations. ALGG aims to promote and protect green and blue infrastructure (including rivers) in London and divides London into 11 Green Grid areas.

- a. The Wandle Valley Green Grid area covers parts of Merton, Sutton, Croydon and Wandsworth.
 - b. Merton also contains parts of the the Arcadian Thames area (shared with other boroughs including Kingston, Richmond and Wandsworth)
 - c. Sutton also contains the London's Downlands area (shared with other boroughs including Bromley and Sutton)
13. Thames Water is the statutory water and sewerage undertaker for Merton and Sutton and is hence a specific consultation body in accordance with the Town & Country Planning (Local Development) Regulations 2012. In Merton and Sutton, Sutton and East Surrey Water is also a statutory water and sewerage undertaker.
14. An extensive network of formal and informal routes for co-operation exists which Merton and Sutton participate in on plan-making issues. These include:
- Working with the Greater London Authority on evidence and consultation for the London Plan. This includes contribution to the pan-London Strategic Housing Land Availability Assessments, town centre healthchecks, office and industrial land capacity.
 - Continuous monitoring of all residential development in London and other types of commercial and strategic development via the London Development Database
 - Creating and delivering the Local Implementation Plans for the Mayor's Transport Strategy
 - Participating opportunities for co-ordination and co-operation such as the Association of London Borough's Planning Officers, Urban Design London, London Councils
 - Merton and Sutton are both part of the [South London Partnership](#) of five south London boroughs working together to on joint strategies and projects to promote south London's economy, infrastructure and living.
 - Working on infrastructure jointly, for example working with Transport for London on the Sutton Link project to provide a new tram route from Sutton to Wimbledon, working together as part of the South London Waste Partnership (Merton, Sutton, Sutton and Kingston) and working together on local infrastructure projects such as XXXX cycle route, Beddington Lane?

Strategic planning issues considered

15. The two local authorities have identified and agreed that across their two boroughs there are strategic planning issues that need to be addressed through the duty to cooperate. These strategic planning matters are:
- Delivering housing need for the housing market area (including Gypsy and Traveller needs)

- The economy including town centres
- Infrastructure provision
- Flood risk
- Waste management

16. These strategic matters are set out in turn below with ongoing actions and whether there is agreement on these at the publication date of this Statement of Common Ground.

Opportunity areas

17. The London Plan identifies areas that will see the most significant change. These are known as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs. Policy SD.1 Opportunity Area in the London Plan 2021 sets out the opportunity areas for London, including for Merton and Sutton.

18. The London Plan 2021 identifies the *Trams Triangle Opportunity Area* referencing Croydon, Sutton and Wimbledon and ascribing Sutton with an indicative target for new homes of 14,500 to 2014 and for jobs of 10,500. This will be considered when Sutton review their 2018 Sutton Local Plan.

19. While the Trams Triangle Opportunity Area does not ascribe homes or jobs targets for Merton, the London Plan policy SD1 provides Merton with the *Wimbledon – South Wimbledon – Colliers Wood Opportunity Area* ascribes indicative targets to Merton of 5,000 homes and 6,000 jobs in the Opportunity Area by 2041.

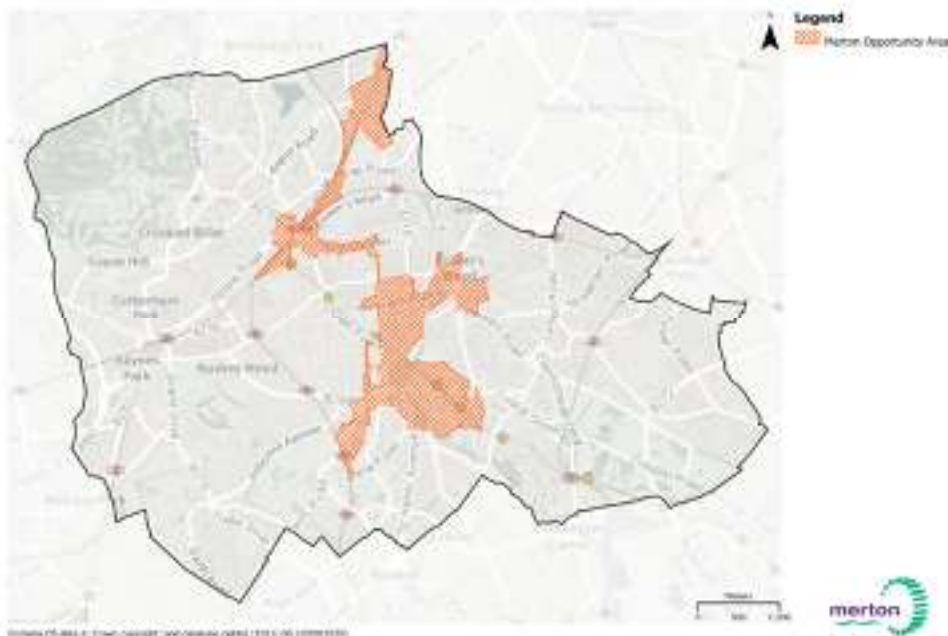


Fig 3: Proposed boundaries of the Wimbledon-South Wimbledon-Colliers Wood Opportunity area in Merton

20. Both boroughs agree that at the current time there are no strategic cross boundary issues identified due to the location of Merton's Opportunity Area boundary (Wimbledon – South Wimbledon – Colliers Wood) not adjoining Sutton. Both boroughs agree that when Sutton review their 2018 local plan, there will be further discussion on opportunity areas.

Strategic Areas for Regeneration

21. As outlined by London Plan policy SD10, there are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. The London Plan identifies these neighbourhoods as Strategic Areas for Regeneration (SARS).
22. The London Plan 2021 identifies three Strategic Areas for Regeneration in Merton around the Phipps Bridge, Pollards Hill and Mitcham town centre, and three in Sutton, close to the borough boundary with Merton. Strategic cross boundary issues are not identified at this time.

Neighbourhood Planning

23. An application for a neighbourhood forum area in Wimbledon (Merton) was refused in July 2021 but is likely to emerge again. This area would have had a boundary with Wandsworth.
24. In Sutton, the Hackbridge and Beddington Corner neighbourhood plan was adopted in July 2019, adjoining the borough boundary with Merton. Both Beddington North Neighbourhood Forum and the Belmont and South Cheam Neighbourhood Forum have designated areas. The Belmont and South Cheam Neighbourhood Forum undertook first stage consultation on its draft Plan in late 2021 and is currently considering responses.

Housing Market Area

25. Whilst Greater London is considered to be the strategic housing market area for the purposes of the London Plan and its SHLAA, the more detailed assessment at a local level identifies five sub-regional areas (North, East, West, South and Central). Merton and Sutton are identified within the South area along with Kingston, Wandsworth, Richmond and Croydon.

Housing delivery and affordable housing

26. The delivery of new and affordable housing is one of the largest strategic issues London faces. Through the London Plan 2021 and in line with Planning Practice Guidance, the Mayor of London sets housing targets for each local planning authority,

based on evidence of housing need and development capacity across the capital. Through their own local plans, authorities must then plan to meet or exceed London Plan targets to ensure they are in general conformity with the London Plan.

27. Merton, Sutton and all other London borough local planning authorities have fed into the London Plan figures – either expressing their support or objection to the new figures, based on a localised understanding of development capacity.

- Merton and Sutton agree that they can meet or exceed the total numerical housing target assigned to them by the Mayor of London in the published-London Plan 2021, within their own borders, thus it is not considered that it constitutes a cross-boundary issue.
- In 2019, during the drafting of the London Plan when the draft London Plan target for Merton proposed as 13,280 homes per decade, Merton asked Sutton if it could assist with helping to meet its housing requirement. Sutton stated that it was unable to assist due to insufficient housing capacity. However, since then the London Plan 2021 has been published with a target of 9,180 homes per decade for Merton. Merton can now meet this 10 year target within its own borders so this is no longer considered to be a cross boundary issue.

Sutton

28. The current housing target in the 2018 Sutton Local Plan is for 6,405 homes over the plan period 2016-2031 (427 homes per year). In the London Plan 2021 Sutton's share of London's new homes is now higher than the adopted 2018 Sutton local plan, at 4,690 from 2019-20 to 2028-29, reflecting the new emphasis that the contribution outer London can play in delivering housing. Sutton is able to meet the Mayor's higher housing target, demonstrated through its up-to-date 5-Year Supply.

Merton

29. The 2021 London Plan sets Merton's share of London's new homes at 918 new homes per year, up from 411 homes in the 2016 London Plan, an increase of over 200%. To inform Merton's emerging 2021 Local Plan and support the delivery of new homes, recognising the substantial increase in Merton's housing target, LBM has produced the following evidence, [all of which is available on Merton's website](#)

- Strategic Housing Market Assessment 2019
- Housing viability study 2020
- Merton's housing delivery study 2021

30. Merton's Strategic Housing Needs Assessment 2019 identifies a need for 878 - 1,084 homes per annum in social / affordable rented sector and a need for 786 - 933 in affordable home ownership sector.

31. The level of need is significant, and for that reason Merton's proposed affordable housing policy (H11.1, Reg.19 version) both set the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the London Plan 2021. Sutton's 2018 Local Plan identified an affordable housing need of 1,1018 per annum to 2031. Policy 8 of the Sutton Local Plan seeks to maximise affordable housing from all sources, setting a minimum target of 35% of all new homes to be affordable; this has been superseded by the 2021 London Plan.
32. Both new Local Plans contain policies that will support the delivery of a range of housing types, including housing for students and the elderly. It is not considered that any of these forms of accommodation, or the provision of affordable homes, leads to strategic cross-boundary issues with the neighbouring boroughs.

Gypsies and Travellers

33. Merton's established traveller site is located in north Wimbledon, on the border with Wandsworth. Sutton's established traveller sites (1 public and 1 private site) are located in Woodmansterne, in the south of the Borough. Both boroughs have carried out research to inform their gypsy and traveller needs assessments, in accordance with the national policy, Planning for Traveller Sites. Sutton can meet its immediate need through a proposed extension to its public site, with future need to be assessed through Sutton's Local Plan review. Work on Sutton's review of need has not yet started but will be discussed in the future through the Duty to Cooperate. Merton can meet needs identified within their boundaries. This has not been identified as a strategic or cross-boundary issue.

The Economy

34. The London Plan 2021 contains the strategic policies which designate Strategic Industrial Locations and town centre designations (from International to District Centres for all London boroughs).
35. The adopted 2018 Sutton Local Plan sets out in accordance with paragraph 20 of the NPPF the approach to the provision of land for industry and warehousing up to 2031.
36. Merton's Local Plan review proposes a similar approach to protect employment land and enable redevelopment to meet future needs.
37. To support the economy the approach to office space in accordance with the London Plan the 2018 Sutton Local Plan seeks to protect and direct office development to Sutton Town Centre and the District Centres. In Merton, Wimbledon is the borough's only major town centre and is attractive to the office market. As these two locations are geographically distant, the planned growth would not have impact on either and there are no strategic cross boundary issues identified from this approach.
38. Both Merton and Sutton contain policies to protect their Strategic Industrial Locations. Both boroughs were classified as "restrictive transfer" in successive Local Plans since

2004 due to the lack of supply and high demand for industrial land as prescribed in the London Plan 2021. Both boroughs acknowledge the industrial heritage of the Wandle Valley in their respective local plans, and both boroughs have their largest strategic industrial locations adjacent to each other (Willow Lane in Merton and Beddington Lane in Sutton.) Sutton's Local Plan identifies sufficient land to meet its industrial need over the Plan period within its own boundaries. The joint preparation of the South London Waste Plan Development Plan Document (together with Kingston and Croydon) has reviewed each borough's SILs where there is capacity for waste uses. Both boroughs follow a protective policy approach to SILs and there are no strategic cross boundary issues arising from this approach.

Town and Local Centres

39. The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them.
40. The Merton Reg19 Local Plan identifies one Major Centre (Wimbledon), three District Centres (Colliers Wood, Mitcham and Morden) and local centres and neighbourhood parades. Colliers Wood is proposed as a new District Centre in Merton's Local Plan. There are not considered to be any cross boundary issues arising from this proposal.
41. The Sutton 2018 Local Plan identifies one Metropolitan Centre (Sutton), seven District Centres (Carshalton Village, Cheam Village, Hackbridge, North Cheam, Rosehill, Wallington and Worcester Park, and beneath this it also identifies local centres and important local parades within the borough.
42. Between boroughs, town centres and parades can be shared by virtue of them crossing the borough boundary. There are no instances of this between Merton and Sutton, although Rosehill District Centre is on the Merton / Sutton borough boundary.
43. No strategic cross boundary issues are identified.

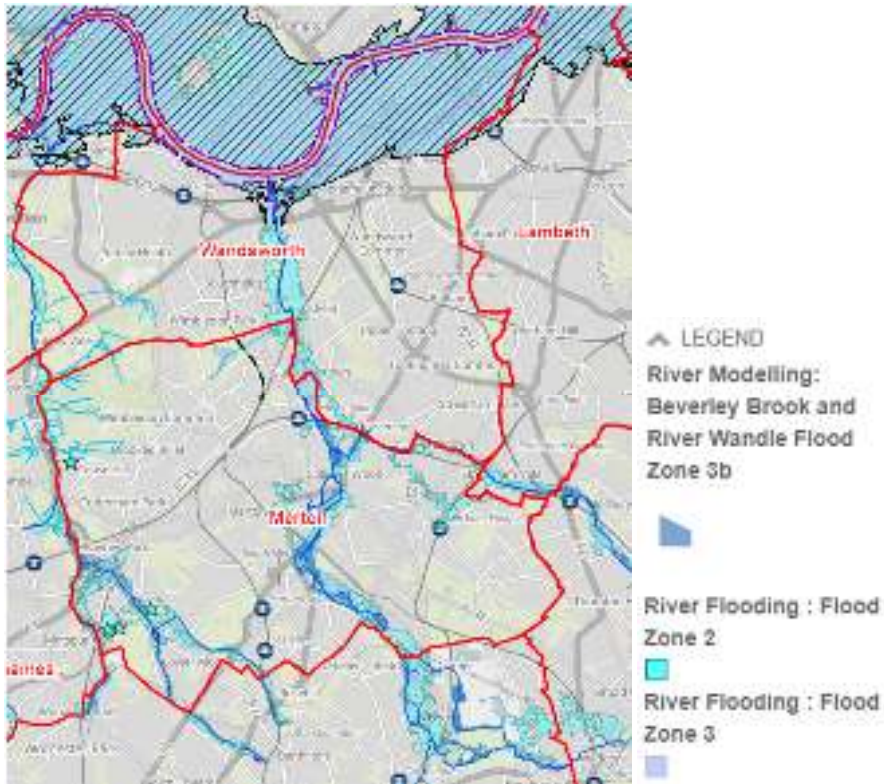
Climate change

44. Both Merton and Sutton councils declared climate emergencies in 2019. Merton Council adopted its Climate Strategy and Action Plan in late 2020, setting a council target for net zero by 2030 and a borough-wide target by 2050. Merton has since adopted its second year of climate actions (February 2022)
45. Sutton has set an ambitious target to achieve net zero carbon emissions (for the council and wider borough). This commitment is reiterated in the Environment Strategy and Climate Emergency Response Plan 2019-2025. The Climate Emergency Response Plan is updated annually with quarterly progress reports also available on the councils website.

46. Both Local Plans contain policies towards achieving net zero, reducing energy and water consumption, using renewable energy and supporting the circular economy. There are no strategic cross boundary conflicts between each borough.

Flood risk

47. The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance for Flood Risk and Coastal Change (PPG) set out the active role Local Planning Authorities should take to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process. The NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and Local Planning Authorities should use the findings to inform strategic land use planning.
48. As the river Wandle runs from its source in Croydon through Sutton and Merton to its mouth joining the river Thames in Wandsworth, in [2015 and 2016 the four councils produced a joint Strategic Flood Risk Assessment covering the Wandle catchment](#).
49. Since then Merton and Wandsworth Councils have produced [an updated joint Level 1 \(November 2020\) and Level 2 \(February 2021\) Strategic Flood Risk Assessment \(SFRA\)](#).
50. The Level 1 Merton and Wandsworth SFRA has collated and analysed the most up to date available flood risk data for all sources of flooding to provide an overview of flood risk across the study area. This has been used by both councils to inform the preparation of their Local Plans, including the application of the Sequential Test to site allocations.
51. The key updates to this revised Merton and Wandsworth Level 1 SFRA (2020) include:
- River Wandle Climate Change Modelling (August 2017)
 - Online Flood Risk Mapping (to Support the Level 1 SFRA)
 - Areas at risk of perched groundwater
 - Further commentary on areas to safeguard for flood risk management, the cumulative impact of development, and opportunities to reduce the causes and impacts of flooding.
52. There are three fluvial flood zones as defined by the Environment Agency (EA): Flood Zone 1, 2 and 3. These areas have been defined following a national scale modelling project for the EA and are regularly updated using recorded flood extents and local detailed modelling. The flood zones are based on the likelihood of an area flooding, with Flood Zone 1 areas least likely to flood and Flood Zone 3 areas more likely to flood. The map below shows the flood extents that cross adjoining boundaries.



53. Merton and Sutton Councils will continue to liaise on the scope and timing of strategic flood risk assessments, particularly regarding the Wandle catchment. Both Local Plans contain similar policies to minimise flood risk from all sources. No additional strategic cross boundary issues have been identified.

Infrastructure provision

54. Merton Council has published its [Infrastructure Delivery Plan 2021](#) to inform the Local Plan submission. It identifies the strategic infrastructure requirements necessary to support the anticipated homes and jobs in Merton over the next 15 years, including consideration of transport, health, education, green and blue infrastructure, sport and leisure, community, utilities, climate change, economic development and emergency services.

55. The current 2018 Sutton Local Plan supports the provision of sufficient infrastructure to meet all development needs over the plan period.

Transport

56. *Roads* The A24 and the A297 are London distributor roads or roads on the TfL road network that join Merton and Sutton. The A236, 237 and 217 (local road) also join the boroughs. This supports cycling and a number of bus routes between Merton (particularly Mitcham) and Sutton town centre.

57. *Rail National* Rail services run via Merton and Sutton, including the “Wimbledon loop” which also runs to central London via Streatham.
58. *Trams* The south London tram network, particularly the Wimbledon to Croydon route, crosses the boundaries of the two boroughs. As already stated, Transport for London is the transport authority and both boroughs work with each other and with TfL on maintenance and improvements of the tram infrastructure. From c2015 Sutton and Merton worked together very closely with Transport for London on the proposed new tram network between Sutton town centre and Merton (Colliers Wood or Wimbledon), known as the “Sutton Link”, however this project was paused in February 2020 due to lack of funding.
59. Both boroughs produce and implement a Local Implementation Plan (LIP) to deliver the Mayor’s Transport Strategy and collaborate with other boroughs and Transport for London on this. No additional strategic cross boundary issues are identified.

Healthcare infrastructure

60. The NHS South West London Clinical Commissioning Group is responsible for planning, commissioning and buying health services for people living and working in south west London. The CCG serves around 1.5 million people living within the six boroughs of Wandsworth, Kingston, Merton, Richmond, Croydon and Sutton. The CCG is responsible for primary care (the services received at a GP practice), hospital treatment, rehabilitation services, urgent and emergency care, community health services, mental health and learning disability services.
61. Merton Infrastructure Delivery Plan 2022, which is informed by the NHS CCG Merton Borough Estates Strategy, sets out the projected health needs in Merton.
62. Strategic cooperation already takes place via the CCG and there are no strategic cross boundary issues.

Education

63. Merton has planned for increased school places and in addition to the expansion of primary schools that took place from 2007 to 2015, a new secondary school was opened in 2018 (Harris Wimbledon) and in 2020 moved to its new site in South Wimbledon. As identified in Merton’s Infrastructure Delivery Plan, there is an increasing need for school places for children with additional needs; Merton Council has expanded the existing special needs school at Cricket Green and proposes additional places at Whatley Avenue towards the west of the borough.
64. Sutton’s Local Plan identified sites for three new Primary Schools, two Secondary Schools and an SEN School to meet the need for school places over the Plan period. To date a new Primary School has been delivered in Hackbridge and a new

Secondary School in Belmont. In March 2021 the Secretary of State approved planning permission for a new Secondary School at Rosehill, Sutton, located on the boundary with Merton (Sutton Free School 1). However, secondary schools in Sutton have proposed an [alternative strategy](#) (see item 6) to Sutton Free School 1 in a joint approach with the secondary school Heads in Merton. This approach means the forecast temporary demand (over the next 5-6 years) for places in Sutton is proposed to be met within the borough as an alternative to building a new school at Rosehill.

65. There is school places movement across borough boundaries but this issue is not identified as a strategic or cross-boundary issue beyond what is referred to above.

Natural environment and green infrastructure

66. Merton has published an Open Space and Green Infrastructure Study 2020 which has informed the Local Plan policies, site designations and Policies Map amendments. Merton has also undertaken and published a Playing Pitch Strategy (adopted 2019) and Indoor Sports Needs Assessment (2020); all of which can be found on [Merton's website](#). As already mentioned, both boroughs are part of the Wandle Valley and support the All London Green Grid Wandle Valley area and the Wandle Valley Regional Park (WVRP). The delivery of the Sutton's Beddington Farmlands restoration scheme, to form the single largest parcel of the WVRP, is a key strategic objective for Sutton. Sutton will prepare any additional relevant evidence in addition to this for the future review of the Local Plan, in consultation with Merton and other interested cross-boundary stakeholders.

67. Both boroughs are continuing the policy position to protect open space. Following a review of evidence, policies and policies map designations for the natural environment, open space and green infrastructure there are no cross boundary issues identified.

Energy infrastructure, minerals, community and cultural infrastructure, tall buildings and the historic environment

68. Following a review of each borough's local plan policies on the issues listed above, no strategic cross boundary issues have been identified.

Waste management

69. Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In their role as Local Planning authorities the four boroughs have planned for waste collaboratively since 2007. The four boroughs produced a joint Development Plan Document (DPD); the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. The four boroughs are revising the South London Waste Plan, joint planning has taken place

and the South London Waste Plan examination is currently underway, with the hearings having taken place in September 2021. Once adopted, the new South London Waste Plan will now cover the planning period 2022 to 2038.

70. Additionally, representations were made to the emerging London plan and a joint Statement of Case from the four boroughs was produced for the examination into the London Plan, which was then adopted in 2021.

71. Both Merton (Regulation 19) and Sutton (adopted 2018) Local Plans contain strategic waste planning policies that reference the South London Waste Plan. Cross boundary considerations are taking place via the joint Development Plan document.

Governance arrangements

72. It will be for each local authority to decide who is the appropriate person to sign the statement.

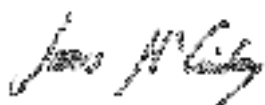
Timetable for review and ongoing cooperation

73. This statement has been informed by on-going engagement between the parties and has been informed by various evidence base documents. Merton and Sutton planning policy officers are in weekly contact on plan-making matters particularly regarding the South London Waste Plan joint development plan document. Both councils also coordinate with each other and other boroughs via Urban Design London, London Councils and in the Association of London Borough Planning Officer (ALBPO) meetings.

74. As this statement focuses on issues of relevance to Merton's Regulation 19 Local Plan and Sutton is yet to commence the Local Plan review, it is only likely to need further updating once work commences on any future revisions to Sutton's Local Plan. Ongoing collaboration between partners will continue through regular meetings on a one to one basis and through attendance at group meetings where cross boundary issues are discussed.

London Borough of Merton.

Signed: James McGinlay

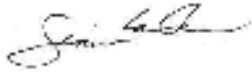
A handwritten signature in black ink, appearing to read 'James McGinlay', is positioned below the typed name.

Position: Assistant Director, Sustainable Communities, London Borough of Merton

Date: 11th February 2022

London Borough of Sutton

Signed: Simon Latham

A handwritten signature in black ink, appearing to read 'Simon Latham', written in a cursive style.

Position: Assistant Director, Housing, Planning and Regeneration

Date: 2nd March 2022

Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 13:04
To: 'Katie.Ryde@bromley.gov.uk'
Cc: Future Merton; 'Nigel.Riley2@bromley.gov.uk'
Subject: Duty to co-operate request – Merton's housing target

Hi Katie,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Bromley to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Bromley can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Valerie Mowah
Sent: 14 February 2020 17:22
To: 'Dominick.Mennie@croydon.gov.uk'
Cc: Future Merton
Subject: FW: Duty to co-operate request – Merton's housing target

Hi Dominick,

Many thanks for your further response, the contents of which are noted.

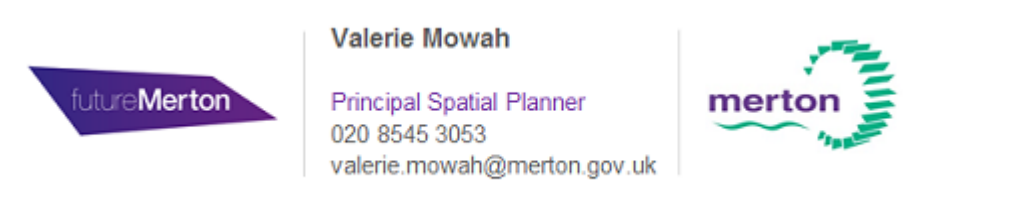
It is intended that Merton's next consultation stage is scheduled for October 2020, so we are in no immediate hurry for Croydon's response and it is recognised that duty to cooperate is iterative so collaborative duty to cooperate dialogue will be on-going throughout Merton's new Local Plan preparation.

I would suggest that the information you request will be addressed in Merton's latest AMR which is currently being prepared and will be published imminently. The AMR is likely to indicate that on the basis of the lower target of 9,180 (2020-30) recommended in the EIP Inspector's report, Merton is likely to incur a shortfall of approximately 456 units. We are confident that over the 10 year period (2020-2030), Merton can apply interventions to address this shortfall, and look to reliance on neighbouring boroughs to assist as a very last resort / backup.

I trust this addresses your queries and look forward to Croydon's response to our original request in due course.

Kind regards

Valerie



From: Mennie, Dominick <Dominick.Mennie@croydon.gov.uk>
Sent: 11 February 2020 17:29
To: Valerie Mowah <Valerie.Mowah@merton.gov.uk>
Cc: Dennington, Steve <Steve.Dennington@croydon.gov.uk>; Dawe, Julia <Julia.Dawe@croydon.gov.uk>; Future Merton <Future.Merton@merton.gov.uk>
Subject: RE: Duty to co-operate request – Merton's housing target

Hi Valerie,

I am looking at this again. We will need to reserve our response until after the SoS makes his decision on the emerging London Plan as our response will very much depend on what the SoS says.

However looking at the information you have provided, and what is online on your website I can't find any details of your housing trajectory and how it composed. In the Mayor's intend to publish London Plan the small sites 'windfall' element of Merton's target has only increased by 24% (or 50 units per annum) (comparing it the 2013 SHLAA). However, your housing trajectory falls even below the overall Intend to Publish target so presumably the problem lies more with the large sites element than the small sites. On this I can find no information as to why Merton doesn't think larger sites will be delivered? Is this information available?

Once we have had the SoS decision on the new London Plan we will get back to you. It may take several weeks at least as I am on leave next week, and once we have digested the SoS decision and the Mayor's response, I will need to run past any response with our Cabinet member.

Noting that your Proposed Submission is not until next year, when do you need a response from us by?

Regards

Dominick

From: Valerie Mowah [<mailto:Valerie.Mowah@merton.gov.uk>]

Sent: 02 December 2019 17:02

To: Mennie, Dominick <Dominick.Mennie@croydon.gov.uk>

Cc: Dennington, Steve <Steve.Dennington@croydon.gov.uk>; Dawe, Julia <Julia.Dawe@croydon.gov.uk>; Future Merton <Future.Merton@merton.gov.uk>

Subject: RE: Duty to co-operate request – Merton's housing target

Hi Dominick,

Many thanks for your prompt response.

Merton's assessment work is iterative and on-going and an updated Authority Monitoring Report (AMR) is currently being prepared.

Merton's published AMR (2017/18) succinctly encapsulates historic and projected housing delivery against the draft London Plan target. It demonstrates that generally whilst Merton has consistently exceeded the adopted London Plan strategic target it has never achieved the Draft London Plan target which represents an uplift of 223% against the current target. Equally assessment of projected housing delivery does not indicate, that the Draft London Plan target can be delivered, without the help of other boroughs.

Please find relevant extracts from the 2017/18 AMR attached for ease of reference. The full AMR document can be accessed [here](#)

Additionally Merton's response to the draft London Plan consultation, including setting out justification for Merton's objections to the draft London Plan housing target for Merton is located [here](#) - page 5 onwards is of particular relevance on this matter.

Regards

Valerie



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



From: Mennie, Dominick <Dominick.Mennie@croydon.gov.uk>
Sent: 02 December 2019 14:14
To: Valerie Mowah <Valerie.Mowah@merton.gov.uk>
Cc: Dennington, Steve <Steve.Dennington@croydon.gov.uk>; Dawe, Julia <Julia.Dawe@croydon.gov.uk>
Subject: RE: Duty to co-operate request – Merton’s housing target

Hi Valerie,

Thank you for your e-mail under Duty to Co-operate. I acknowledge its receipt. Do you have any evidence of your assessment of housing capacity that you could share with us at this stage so we can understand Merton’s position further?

Regards

Dominick

Dominick Mennie
Team Leader (Plan Making)



Place department
Spatial Planning team, Zone 6/B
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

07732 075 761
020 8726 6000 ext 62877

From: Valerie Mowah [<mailto:Valerie.Mowah@merton.gov.uk>]
Sent: 02 December 2019 12:19
To: Mennie, Dominick <Dominick.Mennie@croydon.gov.uk>
Cc: Future Merton <Future.Merton@merton.gov.uk>
Subject: Duty to co-operate request – Merton’s housing target

Dear Dominick,

As part of the preparation of Merton’s emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton’s strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Croydon to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Croydon can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Please help to reduce waste and do not print this message unless you really need to.

This message, including any attached files, is intended just for the use of the individual or organisation to whom it is addressed. Any opinions expressed are those of the sender, not Merton Council. Email is not secure, and the council accepts no responsibility for any inaccuracy, corruption or virus which has occurred during transmission.

This email may be subject to monitoring in accordance with relevant legislation and may be disclosed in response to a request under the Freedom of Information Act 2000.

The message may contain information that is confidential or sensitive; you should handle it accordingly. If you have received this email message in error, you must not copy, disclose or make any further use of the information contained within it. Please notify the system manager (postmaster@merton.gov.uk) or the Head of Information Governance (data.protection@merton.gov.uk), and delete the message.

postmaster@merton.gov.uk

<http://www.merton.gov.uk>

Council services, online, 24/7 www.croydon.gov.uk/myaccount.

Please use this web site address to view the council's e-mail disclaimer - <http://www.croydon.gov.uk/email-disclaimer>

Council services, online, 24/7 www.croydon.gov.uk/myaccount.

Please use this web site address to view the council's e-mail disclaimer - <http://www.croydon.gov.uk/email-disclaimer>

Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 14:24
To: 'planningpolicy@elmbridge.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Elmbridge Borough Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Elmbridge Borough Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 15:00
To: 'lplan@epsom-ewell.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Epsom and Ewell Borough Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Epsom and Ewell Borough Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Valerie Mowah
Sent: 10 January 2020 17:35
To: 'Karol Jakubczyk'
Cc: Wai-Po Poon; Ruth Ormella
Subject: RE: Duty to co-operate - Merton's housing target

Dear Karol,

Many thanks for your e-mail and our brief useful telephone conversation last week on the above matter.

We welcome the opportunity to foster a mutually cooperative relationship and would be happy to host a duty to cooperate meeting at Merton Civic Centre Offices and will follow shortly (next Monday) with meeting invite details. Our preference is 20th January but I will need to check my attending colleagues availability before definitively confirming this date.

During our telephone conversation you advised that Epsom and Ewell would be unable to assist Merton regarding housing numbers but felt it would be mutually beneficial to have a face to face duty to cooperate meeting with LBM "to align strategies around infrastructure" particularly concerning Cross Rail 2 and exploration of mutually beneficial strategic transport connectivity projects and initiatives. Please can you advise by email return, on whether there are any other cross borough infrastructural strategic matters you wish to discuss at the meeting, and if so provide further details which could in turn form the basis of the agenda for the meeting.

Kind regards

Valerie



Valerie Mowah
Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



From: Karol Jakubczyk <KJakubczyk@epsom-ewell.gov.uk>
Sent: 10 January 2020 11:32
To: Valerie Mowah <Valerie.Mowah@merton.gov.uk>
Cc: Wai-Po Poon <WPoon@epsom-ewell.gov.uk>; Ruth Ormella <ROrmella@epsom-ewell.gov.uk>
Subject: Duty to co-operate - Merton's housing target

Dear Valerie

I hope that you are well. You may remember that we briefly spoke last week; on the above matter.

As per our brief telephone conversation, I think that it would be worthwhile meeting to have a face-to-face discussion on our shared strategic matters. The prospect of CR2, or something similar, suggests that our emerging growth and housing strategies and the infrastructure that makes them work could be closely aligned. For that reason I believe that there genuine benefit for both our authorities working, on some level, together. I hope that

this could become a co-operative relationship – even if neither of our authorities can physically share the quantitative burden of our objectively assessed housing needs.

With that in mind could I suggest the following possible dates for meeting:

- Monday 20 January 2020 AM
- Wednesday 22 January 2020 AM or PM
- Monday 27 January 2020 AM

I am happy for us to come up to Morden to meet with you – the delegation would be comprised of myself and my Senior Planning Officer Wai-Po Poon.

Please let me know if this works for you.

Many thanks

Karol

K Jakubczyk

K Jakubczyk
Planning Policy Manager

The information contained in this message is confidential and may be legally privileged. The message is intended solely for the addressee(s). If you are not the intended recipient, you are hereby notified that any use, dissemination, or reproduction is strictly prohibited and may be unlawful. If you are not the intended recipient, please contact the sender by return e-mail and destroy all copies of the original message. Visit the Epsom and Ewell Borough Council website at www.epsom-ewell.gov.uk

Notes of held between London Borough of Merton Council and Epsom and Ewell Council

Duty to Co-operate Meeting

Date of meeting: 20/1/2020

Time – 11am – 12pm

Epsom and Ewell - Karol Jakubczyk; Wei Poon

LBM – Tara Butler; Valerie Mowah; Chris Chowns

Housing

LBM provided a background summary of Merton's housing delivery position, which led to the duty to cooperate request for help from neighbouring and adjacent boroughs such as Epsom and Ewell.

E&E - have extremely challenging land supply – 42% borough is green belt and the remainder is urban land which also contains designated open space e.g. Nonesuch Park. Have evolved from a figure of 181 units per annum delivery to a 2016 SHMA identifying an Objectively Assessed Housing Needs figure of 418 units pa, and a standard methodology figure of 579 units pa. Failed HDT first time round so not only have an action plan but also a 20% buffer = 695 units pa. Likely that E&E will fail the target this year to.

EE – do not have a 5-year housing land supply or an up to date Local Plan therefore know that they will be hit by the NPPF presumption in favour of development policy application. Therefore are currently in the process of preparing a whole new Local Plan. Externally commissioned the preparation of a MasterPlan which proposes a very bold approach to meeting the new housing target which will involve the release of Green Belt Land and the introduction of **very high**

Clear that LBM and E&E are in similar challenging positions concerning meeting the new housing targets.

Valerie Mowah

From: Laura Howard <Laura.Howard@guildford.gov.uk>
Sent: 03 December 2019 10:44
To: Valerie Mowah; Future Merton
Subject: RE: Duty to co-operate - Merton's housing target [UNC]

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Valerie,

Guildford Borough Council adopted its Local Plan: strategy and sites DPD in April 2019. As part of this, sufficient housing supply was identified to meet Guildford's objectively assessed housing need. As part of this process, the Inspector did not consider it appropriate to require Guildford to meet a specific unmet need from neighbouring authorities including Woking Borough Council which sits within Guildford's housing market area. The Council is now in the process of preparing our Development Management DPD and accompanying Supplementary Planning Documents. We are therefore not in a position to assist Merton in meeting its housing shortfall.

Kind regards, Laura

From: Valerie Mowah <Valerie.Mowah@merton.gov.uk>
Sent: 02 December 2019 15:31
To: Planning Policy <PlanningPolicy@guildford.gov.uk>
Cc: Future Merton <Future.Merton@merton.gov.uk>
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Guildford Borough Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Guildford Borough Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Please help to reduce waste and do not print this message unless you really need to.
This message, including any attached files, is intended just for the use of the individual or organisation to whom it is addressed. Any opinions expressed are those of the sender, not Merton Council. Email is not secure, and the council accepts no responsibility for any inaccuracy, corruption or virus which has occurred during transmission.
This email may be subject to monitoring in accordance with relevant legislation and may be disclosed in response to a request under the Freedom of Information Act 2000.
The message may contain information that is confidential or sensitive; you should handle it accordingly.
If you have received this email message in error, you must not copy, disclose or make any further use of the information contained within it. Please notify the system manager (postmaster@merton.gov.uk) or the Head of Information Governance (data.protection@merton.gov.uk), and delete the message.

postmaster@merton.gov.uk
<http://www.merton.gov.uk>

Click [here](#) to report this email as spam.

Guildford Borough Council has arrangements for handling sensitive emails. For more information on how you may be affected please go to www.guildford.gov.uk/SecureEmail. If you have received this message in error, please (a) notify the sender immediately, (b) destroy this email and any attachments, and (c) do not use, copy, and/or disclose this email or any attachments to any person.

Guildford Borough Council regularly updates virus software to ensure as far as possible that its networks are free of viruses. However, you will need to check this message and any attachments for viruses as Guildford Borough Council can take no responsibility for any computer virus that might be transferred by this email.

The contents of this email may not reflect Guildford Borough Council policy. We store and monitor all emails and attachments sent and received by Guildford Borough Council employees in our Cryoserver system for up to 2 years to prevent misuse of the Council's networks.

This message has been scanned for malware by Forcepoint. www.forcepoint.com

Valerie Mowah

From: Future Merton
Sent: 15 January 2020 10:32
To: Valerie Mowah
Subject: FW: Duty to co-operate - Merton's housing target

Abigail Okuley

Programme & Finance Support Officer

futureMerton | Environment and Regeneration

020 8545 3837 | abigail.okuley@merton.gov.uk | www.merton.gov.uk

London Borough of Merton: Switchboard - 020 8274 4901 "Merton Council - Putting You First"

From: Gawthorpe David: H&F <DAVID.GAWTHORPE@lbhf.gov.uk>
Sent: 15 January 2020 10:30
To: Future Merton <Future.Merton@merton.gov.uk>
Cc: Patterson Matt: H&F <Matt.Patterson@lbhf.gov.uk>
Subject: RE: Duty to co-operate - Merton's housing target

Dear Valerie,

Many thanks for your email. Hammersmith and Fulham acknowledge the request made, but unfortunately we are unable to contribute towards Merton's housing target. The primary reason for this, as I'm sure it is for many London Boroughs, is that we have made a commitment to meet our own housing targets.

The remit of the London Plan is to reconcile where housing need arises with where there is capacity across the Capital. As such, the strategic housing allocations of the London Plan represent this exercise, which all boroughs have had input into either through the SHMA and/or EiP. Whilst we recognise the Small Site allocation has imposed unrealistic targets on boroughs, this has been drastically reduced to more achievable levels through the EiP process. London Plan Policy H1 is clear that borough's should plan for and meet their own allocations and that all housing targets are minimums.

Our apologies we could not be of more help.

Kind regards,

David

David Gawthorpe

Team Leader, Policy & Spatial Planning

The Economy Department

Hammersmith & Fulham Council

07776672861

david.gawthorpe@lbhf.gov.uk

www.lbhf.gov.uk/localplan



Strategic Director for The Economy: Jo Rowlands

From: Future Merton <Future.Merton@merton.gov.uk>

Sent: 09 January 2020 12:38

To: LocalPlan: H&F <LocalPlan@lbhf.gov.uk>; Butler Matt: H&F <Matt.Butler@lbhf.gov.uk>; 'thajiinder.janda@lbhf.gov.uk' <thajiinder.janda@lbhf.gov.uk>

Cc: Future Merton <Future.Merton@merton.gov.uk>

Subject: Duty to co-operate - Merton's housing target

Dear Sir / Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Hammersmith and Fulham Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Hammersmith and Fulham Council can provide to Merton on this matter.

Yours faithfully,

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Please help to reduce waste and do not print this message unless you really need to.

This message, including any attached files, is intended just for the use of the individual or organisation to whom it is addressed. Any opinions expressed are those of the sender, not Merton Council. Email is not secure, and the council accepts no responsibility for any inaccuracy, corruption or virus which has occurred during transmission.

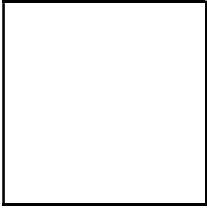
This email may be subject to monitoring in accordance with relevant legislation and may be disclosed in response to a request under the Freedom of Information Act 2000.

The message may contain information that is confidential or sensitive; you should handle it accordingly.

If you have received this email message in error, you must not copy, disclose or make any further use of the information contained within it. Please notify the system manager (postmaster@merton.gov.uk) or the Head of Information Governance (data.protection@merton.gov.uk), and delete the message.

postmaster@merton.gov.uk

<http://www.merton.gov.uk>



Everyone's welcome in Hammersmith & Fulham

[Find out more about the EU Settlement Scheme](#)

Do it online at www.lbhf.gov.uk

To sign up for regular news updates, please go to www.lbhf.gov.uk/newsupdates

If you have received this email in error, please delete it and tell the sender as soon as possible. You should not disclose the contents to any other person or take copies.

All emails you send over the internet are not secure unless they have been encrypted. For further details, please see www.getsafeonline.org/protecting-yourself

Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 12:04
To: 'localplan@kingston.gov.uk'
Cc: Future Merton
Subject: FW: Duty to co-operate request – Merton's housing target

To whom it may concern,

We appear to be receiving bounce backs from the Sheree Aitkin; Hannah Harris and Lisa Fairmaner's email addresses.

We would be most grateful for a response from the Local Plan team to our request.

Kind regards

Valerie



From: Valerie Mowah
Sent: 02 December 2019 11:28
To: 'Sheree.Aitken@rbk.kingston.gov.uk' <Sheree.Aitken@rbk.kingston.gov.uk>
Cc: Future Merton <Future.Merton@merton.gov.uk>
Subject: Duty to co-operate request – Merton's housing target

Dear Sheree,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Kingston to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Kingston can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Kingsley Izundu <kingsley.izundu@kingston.gov.uk>
Sent: 03 December 2019 16:53
To: Valerie Mowah
Cc: Adrian Harding; Nick Greenwood
Subject: Duty to co-operate request – Merton's housing target

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Valerie,

Thank you for your email of Monday 2 December 2019 seeking help from the Royal Borough of Kingston in meeting Merton's housing target.

As I am sure you know, the delivery of housing targets is challenging for virtually all London Boroughs. Kingston is not an exemption to this situation. Under the present circumstance until when the London Plan is finally adopted Kingston will not be able to help LB Merton meet its housing target given that Kingston does not have the spare capacity to do so.

Whilst Kingston is not able to offer LB Merton the assistance it requests, I trust you understand the difficulties we all face in seeking to reach out to our neighbouring boroughs for help where they do not have the capacity to accommodate our housing needs.

Yours sincerely,

Kingsley Izundu

Kingsley Izundu | Policy | Strategic Planning
Royal Borough of Kingston upon Thames, Guildhall 2, High Street, Kingston upon Thames KT1 1EU
Tel: 020 8547 5158 Website: www.kingston.gov.uk

Disclaimers apply, for full details see :

(https://www.kingston.gov.uk/info/200281/policies_and_statements/1212/email_disclaimer)

Valerie Mowah

From: Catherine Carpenter <CCarpenter@lambeth.gov.uk>
Sent: 29 November 2019 13:43
To: Valerie Mowah
Cc: Tara Butler; Robert East; Rob Bristow
Subject: RE: Draft London Plan housing target for Merton

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Valerie,

Thank you for your email. Lambeth is planning to meet and exceed its Draft London Plan housing target but there is insufficient surplus housing capacity on the borough to allow Lambeth to help adjoining boroughs in meeting their housing requirements. Therefore Lambeth is not able to assist Merton with this request.

Kind regards,

Catherine Carpenter BA MA MRTPI
Head of Policy and Place-shaping
Planning, Transport and Development
Sustainable Growth and Opportunity
London Borough of Lambeth

T: 020 7926 1251
M: 07785 660143

www.lambeth.gov.uk/planning

Postal address: London Borough of Lambeth, Planning Transport & Development, PO Box 734, Winchester, S023 5DG

Address for delivery in person or by courier: London Borough of Lambeth, Civic Centre 3rd floor
6 Brixton Hill, London SW2 1EG

From: Valerie Mowah [mailto:Valerie.Mowah@merton.gov.uk]
Sent: 26 November 2019 12:00
To: Robert East <REast@lambeth.gov.uk>; Catherine Carpenter <CCarpenter@lambeth.gov.uk>
Cc: Tara Butler <Tara.Butler@merton.gov.uk>
Subject: Draft London Plan housing target for Merton

Dear Robert and Catherine,

The total numerical housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Lambeth to meet Merton's housing target.

Kind regards



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Please help to reduce waste and do not print this message unless you really need to.

This message, including any attached files, is intended just for the use of the individual or organisation to whom it is addressed. Any opinions expressed are those of the sender, not Merton Council. Email is not secure, and the council accepts no responsibility for any inaccuracy, corruption or virus which has occurred during transmission.

This email may be subject to monitoring in accordance with relevant legislation and may be disclosed in response to a request under the Freedom of Information Act 2000.

The message may contain information that is confidential or sensitive; you should handle it accordingly. If you have received this email message in error, you must not copy, disclose or make any further use of the information contained within it. Please notify the system manager (postmaster@merton.gov.uk) or the Head of Information Governance (data.protection@merton.gov.uk), and delete the message.

postmaster@merton.gov.uk

<http://www.merton.gov.uk>

Disclaimers apply - full details at www.lambeth.gov.uk/email-disclaimer

Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 15:11
To: 'planning.policy@molevalley.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Mole Valley District Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Mole Valley District Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Strategic Policy and Research, Future Merton
London Borough of Merton
Civic Centre
London Road
Morden
SM4 5DX

If telephoning please ask for: Guy Davies
01306 879120

Email: planning.policy@molevalley.gov.uk

By email: valerie.mowah@merton.gov.uk

3 December 2019

Duty to Cooperate with Merton London Borough Council on Housing Matters

Dear Ms Mowah

Thank you for contacting Mole Valley District Council (MVDC) regarding Merton London Borough Council's (MLBC's) emerging draft Local Plan, in particular on MLBC's housing target.

MVDC recognises the difficulties in delivering sustainable growth and the challenge of balancing competing environmental, social and economic pressures. We further recognise the physically constrained nature of Merton Borough. Nonetheless MVDC are concerned that you have said MLBC will be unable to meet the housing target proposed by the Mayor of London as set out in the draft new London Plan.

Three quarters of Mole Valley is within the Metropolitan Green Belt and is therefore heavily constrained. In addition, further constraints include the Surrey Hills Area of Outstanding Natural Beauty, a Special Area of Conservation, areas prone to flooding and other environmental constraints. MVDC is currently updating its own Local Plan and based on current assessments it is clear the Council will have difficulty meeting its own housing need let alone having any spare capacity to contribute towards meeting another areas' housing need or target.

Merton Borough is part of London's Housing Market Area. This was established through the examination of draft new London Plan and reiterated in MLBC's latest Strategic Housing Market Assessment (SHMA), published in July 2019. In addition, paragraph 11.29 of the SHMA, which summarises the key findings on strategic housing market geographies, states:

"The analysis shows strong interrelationships with the south west London authorities and particularly the surrounding ones of Wandsworth, Croydon, Sutton and Kingston-upon-Thames. There are also interrelationships with Lambeth and Richmond-upon-Thames. These are the main local authorities that the Council should engage through the Duty to Cooperate for any matter relating to housing".

Mole Valley does not form part of London's Housing Market Area nor does it have an interrelationship with Merton as concluded by MLBC's own SHMA analysis. Furthermore, the SHMA says MLBC should engage with the south west London authorities through the duty to cooperate for any matter relating to housing.

For the reasons set out above, we do not consider that MVDC should be expected to contribute towards meeting MLBC's housing target.

Yours faithfully,

M Cooksey

Councillor Margaret Cooksey
Cabinet Member for Planning
Mole Valley District Council

Re: Letter Regarding Mole Valley's Unmet Housing Need

Valerie Mowah <Valerie.Mowah@merton.gov.uk>

Wed 21/04/2021 13:13

To: Duncan.Clarke@molevalley.gov.uk <Duncan.Clarke@molevalley.gov.uk>

Cc: Tara Butler <Tara.Butler@merton.gov.uk>

Hi Duncan,

I trust this e-mail finds you well.

Thank you for your e-mail of 3rd March (which Merton Planning Policy Team received via your e-mailed alert on 29th March), asking whether Merton would be able to plan for Mole Valley Council's likely unmet housing need.

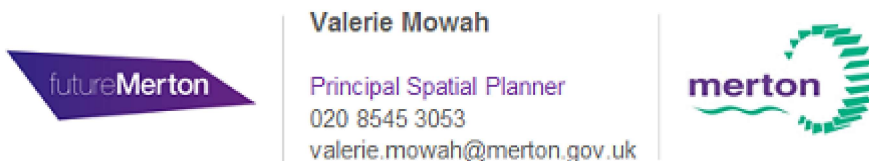
The delivery of the housing targets set out in the new London Plan (March 2021) are challenging for many outer London Boroughs and Merton is no exception, with it's target increasing by 223% from that set out in the previously published London Plan.

Given these circumstances Merton is unable to offer Mole Valley Council the assistance it requests to address its likely unmet need, given that Merton does not have any spare capacity to do so.

Whilst Merton is not able to offer Mole Valley Council the assistance it requests, I trust that you understand the difficulties we all face in seeking to reach out to our neighbouring and adjacent boroughs for help on this issue.

Kind regards

Valerie



From: Tara Butler <Tara.Butler@merton.gov.uk>

Sent: 29 March 2021 10:26

To: Duncan.Clarke@molevalley.gov.uk <Duncan.Clarke@molevalley.gov.uk>

Cc: Valerie Mowah <Valerie.Mowah@merton.gov.uk>

Subject: FW: Letter Regarding Mole Valley's Unmet Housing Need

Hi Duncan,

No, this letter never reached us.

We are happy to respond; my colleague Val (copied in) will get back to you on this.

Are you comfortable with an officer response directly to you?

Regards,

Tara



Tara Butler
Deputy Head of Future Merton
020 8545 4855
tara.butler@merton.gov.uk



From: Clarke, Duncan <Duncan.Clarke@molevalley.gov.uk>
Sent: 29 March 2021 08:55
To: Tara Butler <Tara.Butler@merton.gov.uk>
Subject: Letter Regarding Mole Valley's Unmet Housing Need

Hi Tara,

Hi,

On 3rd March, the Leader of Mole Valley Council wrote to your Leader, asking whether the London Borough of Merton would be able to plan for Mole Valley Council's likely unmet housing need and requesting a reply by 30th April.

I also sent similar letters to other authorities but it seems that, in some instances, the letter has not found its way to the Planning Policy Manager to draft a response. Therefore, I am sending you the letter directly (see attachment).

As you will be aware, a number of councils have failed their legal compliance test on Duty to Cooperate recently so I cannot stress enough how helpful it would be if you/your Leader could respond to this letter.

Many thanks,

Duncan

Duncan Clarke
Planning Policy Manager

Mole Valley District Council
Pippbrook
Dorking. RH4 1SJ

E: duncan.clarke@molevalley.gov.uk

T:

This MVDC email is only intended for the individual or organisation to whom or which it is addressed and may contain, either in the body of the email or attachment/s, information that is personal, confidential and/or subject to copyright. If you are not the intended recipient, please note that copying or distributing this message, attachment/s or other files associated within this email, is strictly prohibited. If you have received this email in error, please notify the sender immediately and then delete it.

Valerie Mowah

From: Valerie Mowah
Sent: 09 January 2020 12:08
To: 'LDF@reigate-banstead.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Reigate and Banstead Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Reigate and Banstead Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah
Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 12:38
To: joanne.capper@richmond.gov.uk
Cc: Future Merton
Subject: Duty to co-operate request – Merton’s housing target

Hi Jo,

I hope this e-mail finds you well.

As part of the preparation of Merton’s emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton’s strategic housing target.

Merton’s total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Richmond to help contribute to meeting Merton’s housing target.

Please do not hesitate to contact me should you wish to discuss this request further, as we would kindly welcome any assistance Richmond can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 14:40
To: 'planningpolicy@runnymede.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Runnymede Borough Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Runnymede Borough Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Valerie Mowah
Sent: 09 January 2020 12:28
To: 'tim.cutts@southwark.gov.uk'; 'planningpolicy@southwark.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Hi Tim,

I hope this e-mail finds you well.

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Southwark Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Southwark Council can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Bridges, Hannah <H.Bridges@spelthorne.gov.uk> on behalf of Local Plan <Local.plan@spelthorne.gov.uk>
Sent: 09 January 2020 08:30
To: Valerie Mowah
Cc: Biggs, Ann
Subject: RE: Duty to co-operate - Merton's housing target

Dear Valerie Mowah,

Thank you for your email.

Unfortunately Spelthorne Borough Council will not be able to assist Merton in helping to meet its housing needs.

Spelthorne is a very constrained Borough with 65% designated as Green Belt and 26% of this comprising reservoirs. In addition, a notable proportion of the Borough is at risk of flooding from the River Thames and its tributaries. As such, we face the challenge of meeting our own housing needs within a constrained environment.

We are currently consulting on our Preferred Options Local Plan until 21 January. This sets out our preferred site allocations and our initial estimations indicate that we will likely be able to meet our own needs but there will not be any surplus supply. Further information on our ongoing consultation can be found online at: <https://www.spelthorne.gov.uk/localplan>

We invite you to submit a representation to the consultation and if you require any further information on the above please do not hesitate to contact us.

Kind regards,

Hannah Bridges MRTPI
Senior Planning Officer (Strategic Planning)

Spelthorne Borough Council,
Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB
01784 446405

For more information about how we store and retain your personal data, please look at our [Strategic Planning privacy notice](#) and [Strategic Planning retention schedule](#).

From: Valerie Mowah <Valerie.Mowah@merton.gov.uk>
Sent: 02 December 2019 14:48
To: Local Plan <Local.plan@spelthorne.gov.uk>
Cc: Future Merton <Future.Merton@merton.gov.uk>
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Spelthorne Borough Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Spelthorne Borough Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Please help to reduce waste and do not print this message unless you really need to.

This message, including any attached files, is intended just for the use of the individual or organisation to whom it is addressed. Any opinions expressed are those of the sender, not Merton Council. Email is not secure, and the council accepts no responsibility for any inaccuracy, corruption or virus which has occurred during transmission.

This email may be subject to monitoring in accordance with relevant legislation and may be disclosed in response to a request under the Freedom of Information Act 2000.

The message may contain information that is confidential or sensitive; you should handle it accordingly. If you have received this email message in error, you must not copy, disclose or make any further use of the information contained within it. Please notify the system manager (postmaster@merton.gov.uk) or the Head of Information Governance (data.protection@merton.gov.uk), and delete the message.

postmaster@merton.gov.uk

<http://www.merton.gov.uk>



www.spelthorne.gov.uk/localplan

Spelthorne Means Business

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

*This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).*

Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 14:08
To: 'Policy.Consult@surreyheath.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Surrey Heath Borough Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Surrey Heath Borough Council can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 12:14
To: DUNCAN CLARKE (duncan.clarke@sutton.gov.uk)
Cc: Future Merton
Subject: Duty to co-operate request – Merton’s housing target

Dear Duncan,

As part of the preparation of Merton’s emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton’s strategic housing target.

Merton’s total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Sutton to help contribute to meeting Merton’s housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Sutton can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Ms Valerie Mowah
Principal Spatial Planner
London Borough of Merton
Civic Centre
London Road
Morden. SM4 5DX

Simon Latham
Assistant Director of Environment, Housing
and Regeneration Directorate
London Borough of Sutton
24 Denmark Rd,
Carshalton SM5 2JG

duncan.clarke@sutton.gov.uk
Tel: 020 8770 5000
DD: 020 8770 6453
Date: 10 December 2019

Ref: [Mert-Sutt Dtc Housing]

Dear Valerie,

Thank you for your email of 2 December 2019 regarding your request for the London of Sutton to meet some of the London Borough of Merton’s future housing target.

London Plan Housing Targets

I appreciate Merton’s predicament as regards the Draft London Plan housing targets because Sutton faces a similar daunting task. However, I would suggest that the Sutton’s position is arguable worse than Merton. As Table 1 shows, whether on the Draft London Plan or Panel Report figures, Sutton suffers more from an inflated, unidentified and, in the case of the Draft London Plan, unjustified small sites target. This component is the more difficult to deliver because, whereas the large site component is the product of negotiation, the small site component is “handed down” to boroughs by the GLA. As I remember, the London Strategic Housing Land Availability Assessment (SHLAA) process required boroughs to nominate and agree their large sites and so, in the case of the Merton housing target, the borough effectively signed up to 49% or 72% of its target at the time of the SHLAA whereas Sutton only signed up to 21% or 43% of its target.

Table 1: Housing Targets in Draft London Plan and in Panel Report Recommendations

Document	Overall Target	Large Site Component	Small Site Component
Merton Draft London Plan	1,328nda	657nda (49%)	671nda (51%)
Merton Panel Report	918nda	657nda (72%)	261nda (28%)
Sutton Draft London Plan	939nda	201nda (21%)	738nda (79%)
Sutton Panel Report	469nda	201nda (43%)	268nda (57%)

Internal Migration

Secondly, it appears that Sutton is already contributing indirectly to meeting Merton's housing need through internal migration. Merton is by far the biggest exporter of population to Sutton and, as Table 2 shows, it is not an insignificant amount, averaging approximately 1,450 persons per year.

Table 2: Internal Migration between the London Boroughs of Sutton and Merton

Year	Movement to Sutton	Movement to Merton	Net Movement to Sutton
2014-15	+2,120	-790	+1,330
2015-16	+2,080	-750	+1,330
2016-17	+2,400	-770	+1,630
2017-18	+2,330	-830	+1,500

Sutton's Constraints

Finally, although Sutton plays its part in solving London's housing crisis and consistently delivers on its housing target, it is nonetheless a very constrained borough: 606ha are Green Belt and 529ha are Metropolitan Open Land. In addition, large areas of the boroughs are occupied by semi-detached housing which, as we explained in our joint-submission to the London Plan Examination-in-Public, is difficult technically to convert as well as unviable to replace with other forms of residential development.

Therefore, in light of

- (i) the large number and proportion of unidentified small sites that Sutton has to find to meet its own target;
- (ii) the high level of internal migration from Merton to Sutton; and,
- (iii) the existing land uses constraining further development in Sutton,

the London Borough of Sutton is unable to accommodate any part of Merton's housing target even the lower target.

If you have any questions, please do not hesitate to contact me.

Yours sincerely

Duncan

Duncan Clarke
Strategic Planning Manager

London Borough Of Sutton

Valerie Mowah

From: Sarah Thompson <SThompson@tandridge.gov.uk>
Sent: 11 December 2019 16:35
To: Valerie Mowah
Cc: LocalPlan
Subject: RE: Duty to co-operate - Merton's housing target

Dear Valerie,

Thank you for your email.

You may be aware that Tandridge District Council have recently concluded 10 days of Hearings in our Local Plan 2033, which identified that we could not meet our objectively assessed housing need.

Consequently, we are unable to assist you with meeting your strategic housing target.

We would also question the links Tandridge District shares with Merton, as our Strategic Housing Market Assessment did not identify strong links with Merton that would make it a reasonable option to consider as part of the Housing Market Area.

Kind Regards

Sarah

Sarah Thompson
Head of Strategy
Strategy
Tel: 01883732887

sthompson@tandridge.gov.uk

Tandridge District Council
The Council Offices
8 Station Road East
Oxted, Surrey
RH8 0BT

www.tandridge.gov.uk



From: Valerie Mowah <Valerie.Mowah@merton.gov.uk>
Sent: 02 December 2019 15:26
To: LocalPlan <LocalPlan@tandridge.gov.uk>
Cc: Future Merton <Future.Merton@merton.gov.uk>
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Tandridge District Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Tandridge District Council can provide to Merton on this matter.

Yours faithfully



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Please help to reduce waste and do not print this message unless you really need to.
This message, including any attached files, is intended just for the use of the individual or organisation to whom it is addressed. Any opinions expressed are those of the sender, not Merton Council. Email is not secure, and the council accepts no responsibility for any inaccuracy, corruption or virus which has occurred during transmission.
This email may be subject to monitoring in accordance with relevant legislation and may be disclosed in response to a request under the Freedom of Information Act 2000.
The message may contain information that is confidential or sensitive; you should handle it accordingly.
If you have received this email message in error, you must not copy, disclose or make any further use of the information contained within it. Please notify the system manager (postmaster@merton.gov.uk) or the Head of Information Governance (data.protection@merton.gov.uk), and delete the message.

postmaster@merton.gov.uk
<http://www.merton.gov.uk>

Valerie Mowah

From: Hutchings, Adam <Adam.Hutchings@richmondandwandsworth.gov.uk>
Sent: 07 January 2020 13:44
To: Valerie Mowah
Subject: RE: Duty to co-operate request – Merton's housing target

Follow Up Flag: Follow up
Flag Status: Flagged

Official

Hi Valerie,

Your message is timely as we at Wandsworth are currently engaged in the preparation of an evidence base to support our own local plan and have begun looking at housing need and targets and we recognise that housing is a strategic and cross-boundary issue between Merton and Wandsworth. Wandsworth is currently on track to meet our adopted London Plan housing target. However, initial suggestions from our emerging Local Housing Needs Assessment are that we may struggle to meet our needs. As we all know, London as a whole is unable to meet its housing needs (both the Mayor of London's original draft overall housing target for London as set out in the draft new London Plan as well as the alternative lower target(s) suggested by the Panel of Inspectors Report, which is now proposed to be adopted by the Mayor, do not meet London's needs), and we assume that London boroughs would generally be unable to take any need of another borough. As such, we do not have any spare housing capacity to meet unmet need from any other boroughs. Indeed, if we were able to meet our own future housing need and/or even exceed the London Plan target(s), as these are not applied as a cap, we would be seeking to exceed those rather than meeting another borough's need.

We would therefore suggest that we agree that housing continues to remain a strategic and cross-boundary issue between Wandsworth and Merton, and that we both recognise the importance of planning to meet identified needs, along with taking a consistent approach to other key strategic / cross-boundary matters such as employment, G&T, waste etc. We would like to be kept involved and updated in relation to the development of your evidence on local housing needs, through the duty to co-operate, and maybe as part of a future meeting and look forward to continuing discussions under the duty to co-operate and also in due course on a Statement of Common Ground.

We will be in touch with you soon as we would like to consider having a duty to co-operate meeting with Merton, particularly in respect of the Wandsworth Local Plan Full Review, which would also provide an opportunity for Merton officers to update us on your progress on the Local Plan.

Kind regards,

Adam.

Adam Hutchings

Principal Planner Policy
Serving Richmond and Wandsworth Councils

T: 020 8871 6650 E: adam.hutchings@richmondandwandsworth.gov.uk

www.richmond.gov.uk / www.wandsworth.gov.uk

From: Valerie Mowah <Valerie.Mowah@merton.gov.uk>

Sent: 02 December 2019 12:47

To: PlanningPolicy Wandsworth <Wandsworthplanningpolicy@richmondandwandsworth.gov.uk>; Hutchings, Adam <Adam.Hutchings@richmondandwandsworth.gov.uk>

Subject: Duty to co-operate request – Merton’s housing target

Hi Adam,

I hope this e-mail finds you well.

As part of the preparation of Merton’s emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton’s strategic housing target.

Merton’s total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Wandsworth to help contribute to meeting Merton’s housing target.

Please do not hesitate to contact me should you wish to discuss this request further, as we would kindly welcome any assistance Wandsworth can provide to Merton on this matter.

Yours sincerely

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Please help to reduce waste and do not print this message unless you really need to.

This message, including any attached files, is intended just for the use of the individual or organisation to whom it is addressed. Any opinions expressed are those of the sender, not Merton Council. Email is not secure, and the council accepts no responsibility for any inaccuracy, corruption or virus which has occurred during transmission.

This email may be subject to monitoring in accordance with relevant legislation and may be disclosed in response to a request under the Freedom of Information Act 2000.

The message may contain information that is confidential or sensitive; you should handle it accordingly.

If you have received this email message in error, you must not copy, disclose or make any further use of the information contained within it. Please notify the system manager (postmaster@merton.gov.uk) or the Head of Information Governance (data.protection@merton.gov.uk), and delete the message.

postmaster@merton.gov.uk

<http://www.merton.gov.uk>

IMPORTANT:

This email and any of its attachments are intended solely for the use of the individual or entity to whom they are addressed. If you have received this message in error you must not print, copy, use or disclose the contents to anyone. Please also delete it from your system and inform the sender of the

error immediately. Emails sent and received by Richmond and Wandsworth Councils are monitored and may be subsequently disclosed to authorised third parties, in accordance with relevant legislation.

Valerie Mowah

From: Valerie Mowah
Sent: 02 December 2019 14:34
To: 'planning.policy@woking.gov.uk'
Cc: Future Merton
Subject: Duty to co-operate - Merton's housing target

Dear Sir/ Madam,

As part of the preparation of Merton's emerging draft Local Plan we are assessing housing capacity over the new Local Plan period (2020 -2035) to address delivery of Merton's strategic housing target.

Merton's total housing target proposed by the Mayor of London in the Draft London Plan ranges from 9,180 to 13,280 homes which Merton will be unable to meet. As such we wish to request the help of neighbouring and adjoining boroughs, such as Woking Borough Council to help contribute to meeting Merton's housing target.

Please do not hesitate to contact valerie.mowah@merton.gov.uk or telephone: 0208 5453053 should you wish to discuss this request further, as we would kindly welcome any assistance Woking Borough Council can provide to Merton on this matter.

Yours faithfully

Valerie Mowah



Valerie Mowah

Principal Spatial Planner
020 8545 3053
valerie.mowah@merton.gov.uk



Statement of Common Ground – London Borough of Merton and Transport for London

Introduction

1. A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Merton's Regulation 19 Local Plan is '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.
2. The purpose of the statement of common ground between the London Borough of Merton (LBM) and Transport for London (TfL) is for both parties to acknowledge areas of common ground and to set out areas of cooperation and progress to address joint strategic transport matters. It demonstrates how effective and on-going joint working has informed strategic policy-making through the whole review of Merton's Local Plan ([submitted December 2021](#)) and forms part of the evidence demonstrating compliance with the 'duty to cooperate'.
3. London's transport network consists of a hierarchy of routes ranging from local streets and town centres at borough level to the major road and public transport routes that operate across borough boundaries and have an impact London wide. TfL and LBM have responsibility for the management and operation of different parts of the transport network, so delivering an integrated and efficient transport network requires action and cooperation from both parties.
4. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (MTS) and has responsibility for the day to day operation of significant parts of the public transport network, the Transport for London Road Network (TLRN) and all traffic signals in London.
5. LBM is the Highway Authority responsible for managing and delivering schemes for all other adopted roads in the borough. Boroughs are required to produce and implement a Local Implementation Plan (LIP) which demonstrates how they will deliver the Mayor's Transport Strategy. Merton's Third Local Implementation Plan (LIP3) was adopted in 2019.
6. Merton and TfL officers have extensive ongoing dialogue through the development and delivery of Merton's Local Implementation Plan (LIP) and regularly discuss strategic transport matters affecting Merton and Greater London. Merton and TfL also have regular contact in relation to planning matters, including on strategic planning applications within Merton. TfL have submitted comments on Merton's emerging Local Plan at each stage of preparation including Regulation 19. These ongoing discussions with TfL have informed the development of Merton's Local Plan to submission stage, particularly in respect of Chapter 16, Sustainable Transport.

Strategic Geography and Transport Links

7. Merton is an outer London borough as defined in the London planning process (Annex 2 of the 2021 London Plan) and is located in the south west of Greater London. Merton has boundaries with the London boroughs of Sutton, Croydon, Wandsworth and Lambeth and the Royal Borough of Kingston-upon-Thames.
8. Merton is projected to experience significant growth during the plan period. Merton's ten-year target for additional homes set in the 2021 London Plan is 9,180, more than double the former London Plan target of 4,107. It is anticipated that new homes and jobs will be concentrated around the existing town centres and areas of the borough with good access to public transport and local services, particularly those in areas identified as opportunity areas including Morden, Colliers Wood, South Wimbledon and Wimbledon.
9. Parts of Merton benefit from a good public transport provision principally around the town centres but there are other parts of the borough where connectivity remains poor. TfL operated public transport services in Merton include the Tram Service from Wimbledon to Croydon and a network of 28 bus routes. TfL also operates the Northern and District Line Underground services which have terminals in Morden and Wimbledon respectively.
10. Merton Council manages the majority of the borough's network of highways including the footways, cycle facilities and on-street parking. A relatively large proportion (35%) Merton is covered by open space, which includes some strategically important active travel routes within the borough and into neighbouring boroughs, including the Wandle Trail.
11. The Transport for London Road Network (TLRN) in Merton consists of the A297, St Helier Avenue and the A24 which cuts through the centre of the borough passing directly through the district centres of Colliers Wood and Morden. The strategically important Cycleway 7, which starts from Colliers Wood on the A24 and provides a cycle route into central London, is also part of the TLRN.

Strategic Transport Matters

12. The following section summarises the areas of common ground on key transport policy areas and specific transport schemes that will be delivered within Merton and will require joint working and agreement between TfL and LBM.

Overarching Transport Policy

13. The MTS sets out that the overarching approach to addressing some of London's transport challenges is to reduce dependency on private vehicles in favour of active, efficient and sustainable modes of travel. The Mayor has set an overarching target for 80 per cent of all trips in London to be made on foot,

by cycle or using public transport by 2041. The specific target for resident's daily trips in Merton is 73% by sustainable modes by 2041, an increase from 61% in 2021. The most effective way to achieve this will be through the implementation of a comprehensive package of transport measures that prioritise and enable sustainable travel options alongside measures to better manage and reduce the impact of car use, parking and freight. Both parties agree that Merton's Local Plan is consistent with the overarching approach to transport as set out in the MTS and the London Plan.

Healthy Streets Approach and Vision Zero

14. Merton supports TfL's Healthy Streets Approach and The Mayor's Vision Zero target for road safety. Vision Zero sets out a strategy and action plan to reduce danger on the streets, so that by 2041 all deaths and serious injuries will be eliminated from London's transport network. The Healthy Streets Approach puts people's health at the centre of how streets and public spaces are designed, managed and used. Both parties agree that schemes implemented on their transport networks in Merton should adhere with the Healthy Streets and Vision Zero approaches. Both parties agree that through the London Plan and Merton's local plan policies, developments in Merton will be required to adhere to the Mayor's Healthy Streets and Vision Zero Approaches.

Managing traffic, parking and freight

15. The Local Plan contains policies that seek to better manage and reduce the impact of traffic, parking and freight. Both parties agree that this will be essential to achieve mode share targets and tackle congestion, pollution and safety concerns on the road network as a whole.
16. In response to TfL comments, LBM made changes to the Local Plan at regulation 18 and 19 stages to strengthen and clarify the position in relation to car parking and ensure conformity with the London Plan. Both parties agree that Merton's Local Plan now complies with the approach set out in the London Plan of restricting car parking provision to restrain car use and to apply the London Plan maximum car parking standards for new development proposals in Merton.
17. TfL have made comments on the potential impact of sites allocated for development on the TLRN in representations made during previous consultation stages and Merton have amended the site allocations to include these.
18. Freight, servicing and delivery vehicles, particularly heavy goods vehicles are a significant source of noise and air pollution, particularly around commercial and industrial locations. Both parties agree that they will collaborate to implement a package of measures to manage and reduce the impact of freight. These include London wide and sub- regional measures set out in the MTS and managed by TfL, such as the LEZ, ULEZ and the HGV Safety Permit. At a borough level this will include local parking and traffic management measures and restrictions. Both parties agree with the approach of the Local Plan to require development proposals to manage deliveries and construction traffic and in referencing the TfL guidance on Delivery and Servicing Plans and Construction Logistics Plans.

Public Transport Schemes

19. The Mayor's Transport Strategy sets out that significant investment will be needed in the public transport network to improve the customer experience and support anticipated growth without increasing crowding. There are a number of key transport schemes identified in the Mayor's Transport Strategy and London Plan Policy T3 that are relevant to Merton and will deliver an enhanced or expanded travel network to accommodate growth sustainably. These schemes have been identified in Merton's Local Plan and are also included in the [Infrastructure Delivery Plan 2021](#) and the indicative delivery plan to 2041 in Merton's LIP 3. Both parties agree that the paragraphs below provide up to date information, as of February 2022, on the status, progress and likely timescales for delivery of key public transport schemes outlined in Merton's Local Plan.

Crossrail 2

20. The Mayor's Transport Strategy sets out that proposals for a major new line, Crossrail 2 will be essential to alleviate existing overcrowding on the South West Main Line and will have a significant impact on the borough. TfL still expect that the scheme will be required in the long term but the impact of the Covid 19 pandemic on travel patterns has resulted in uncertainties around the future and financing of the scheme. An agreement between the Government and TfL in late 2020 has put the scheme development in good order until such time as the scheme can be further progressed. Both parties agree that they will continue to collaborate on any future developments in relation to this project but that it would now be expected to take place beyond this Local Plan period.

21. Some land within the borough has been identified and safeguarded in the [Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015](#) and both parties agree to support the Secretary of State to refresh the safeguarding directions. Both parties agree to promote discussion with and inform developers that are directly affected by the safeguarding directions and those potentially affected sites beyond the current safeguarded limits that may be critical for the delivery of this strategic project.

London Underground

22. The Mayor's Transport Strategy proposes upgrades to the Underground network which would enable faster and more frequent services, as well as improved accessibility and a more pleasant travelling environment, including through the four lines modernisation programme. This was due to deliver upgrades to the District line but following a recent TfL review assessing and challenging costs and schedules, the re-signalling of the western branches of the District line will not be included in the programme. This means the section of the District line south of East Putney to Wimbledon will remain under the existing signalling and journey times in these sections will remain unchanged, although TfL will continue to assess whether this signalling can be converted in future. However, the programme will still deliver increased frequencies to up to 16 trains per hour on the Wimbledon Branch when more trains are introduced to the central area, now programmed for July 2023 - February 2024.

London Trams and Sutton Link

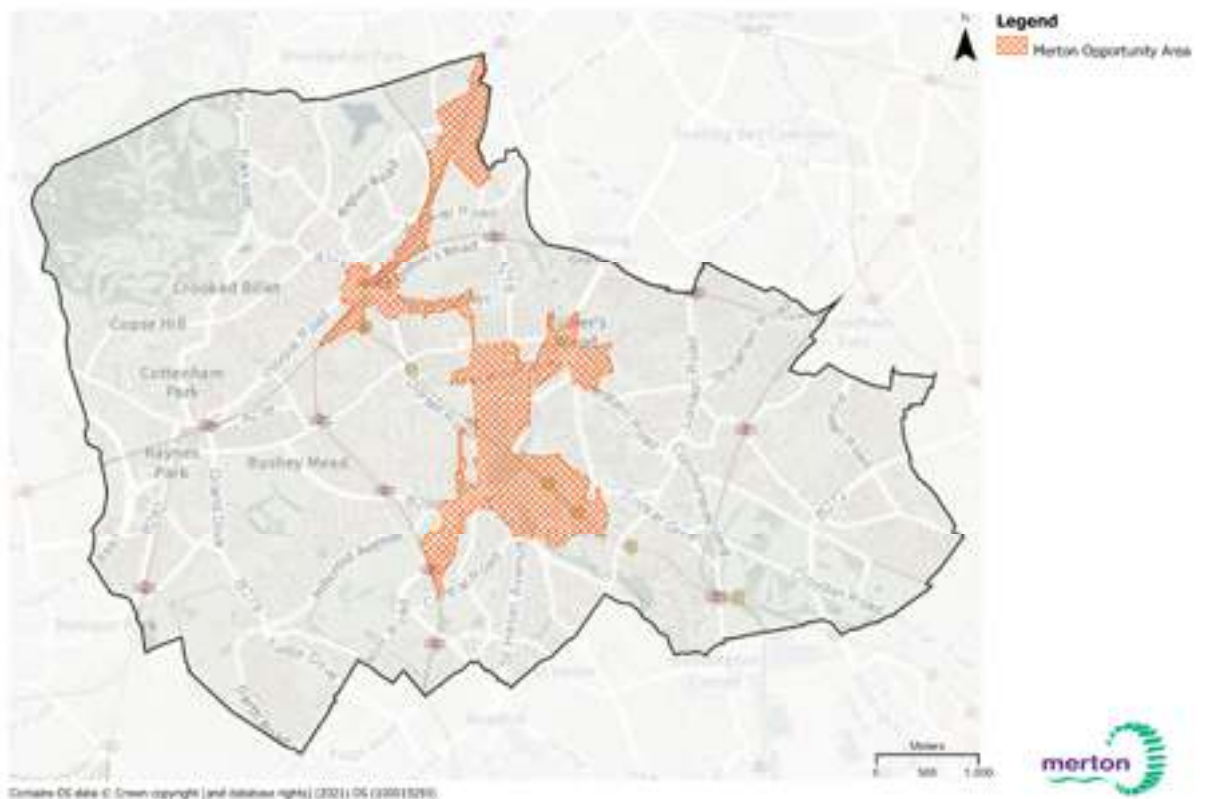
23. Merton is served by London Trams that provides a major orbital link between Wimbledon and Croydon Town Centre via Mitcham. However, the service suffers from over-crowding at peak times and a significant capacity increase is needed to accommodate the anticipated growth in homes and jobs in south London, without reliance on the car. The Mayor's Transport Strategy sets out proposals to upgrade the tram system to improve its reliability and to increase its peak frequency. This includes twin tracking between Morden Road and Phipps Bridge tram stops, which TfL still plan to implement. However, there is no TfL funding allocated at this time so timescales can't be confirmed. The current estimate for delivery is beyond 2031 if funding is secured.
24. Other tram proposals include a potential new tram stop to serve Willow Lane, but this proposal does not form part of TfL's plans and has no allocated funding, so would only be progressed during the plan period as part of appropriate enabling development.
25. TfL have long term aspirations for a better connection between the Trams network and the Northern line which could potentially run on a spur from Morden Road to South Wimbledon. However, there is no TfL funding allocated at this time, so timescales can't be confirmed. The current estimate for delivery is beyond 2031 if funding is secured.
26. A proposed new tram service the "Sutton Link" would create a new, direct and quick route between Sutton and Merton that would offer interchange with the existing tram service. Following public consultation in 2019, TfL's preferred option would serve Colliers Wood via St Helier Avenue, Morden Road and Church Road. Work on the Sutton Link project was paused in July 2020 as it had not proved possible to identify the funding needed to deliver the scheme. If circumstances change and new funding opportunities emerge, then the case for taking the scheme forward will be reviewed.

Bus Services

27. Merton is served by an extensive network of 28 bus services. However, as set out in the Mayors Transport Strategy, significant enhancements to bus services will be required to make the bus an attractive alternative option to replace car journeys, particularly in parts of outer London less well served by public transport. Both parties agree to continue to collaborate on the regular network development review process and to deliver bus priority schemes and bus stop improvements on Merton's roads.
28. The Mayor's Transport Strategy sets out an aim for the TfL bus fleet to emit zero exhaust emissions by 2037 at the latest. Routes 200 and 413 are currently operated with zero emissions vehicles and route 264 has been allocated zero emission vehicles on a new contract due to commence in 2022. Works have already been carried out at Merton bus garage in Colliers Wood to support zero emissions bus fleets. Both parties agree to continue to collaborate on an ongoing basis to facilitate the decarbonisation of the TfL bus fleet and routes in Merton.

Opportunity areas

29. The London Plan identifies areas known as Opportunity Areas (OAs) that will see the most significant change. Policy SD.1 of the London Plan 2021 sets out the Opportunity Areas for Merton as shown below. The policy ascribes indicative targets to the *Wimbledon – South Wimbledon – Colliers Wood Opportunity Area* of 5,000 homes and 6,000 jobs in the Opportunity Area by 2041. The GLA, has agreed that Morden can be included in this OA.



30. Fig : Proposed boundaries of the Opportunity Areas in Merton

31. The Council will seek to collaborate with GLA and TFL to develop Opportunity Area Planning Frameworks (OAPFs), and when delivering development within the OAs, to ensure that growth and regeneration potential is delivered in a sustainable way and that ambitious sustainable transport mode share targets are realised.

32. Collaboration with TfL be particularly important in The Morden Regeneration Zone which is expected to deliver circa 2000 new homes. The TLRN A24 route that runs through Morden Town Centre, partly as a gyratory system, creates traffic dominance, results in a poor experience for pedestrians and cyclists and negatively impacts on public realm. Both parties agree that there is a need to work collaboratively on the comprehensive regeneration of Morden to deliver improvement to the road network in accordance with vision zero and healthy streets objectives to give greater priority to pedestrians and cyclists and improve the public realm including the provision of alternative facilities for bus standing.

The preferred route of the Sutton-Link Tram extension runs within 400m of Morden Town Centre but this project has now been paused as set out above in paragraph 26. Both parties agree that the Local Plan has been updated to reflect the latest situation and that if circumstances change then the case for taking the scheme forward will be reviewed.

Scheme Delivery and Funding

33. Merton's transport strategy and proposed measures have been set out in the LIP3, which has been agreed by TfL. This includes a three year LIP delivery programme for the period 2019/20 to 2021/22, with a requirement to develop a further three year delivery period up to 2024/25 to be agreed by TfL. Funding is usually allocated to LBM by TfL on an annual basis to enable them to implement schemes in the agreed LIP delivery programme, such as walking and cycling routes. However, the impact of the covid crisis on TfL's finances has resulted in disruption to the allocation of funding to boroughs for the delivery of the LIP programmes during the 2020/21 and 2021/22 financial years. LBM has submitted an interim delivery plan for the year 2022/23 but TfL is still not able to confirm the allocation of funding for the delivery of the LIP programme (as of February 2022). Both parties agree that there remains ongoing uncertainty about TfL's funding situation and that this has the potential to have a significant impact on TfL's operation of the transport network in London, TfL's delivery of new transport schemes as set out in the MTS and on TfL's allocation of funding to LBM to deliver transport schemes set out in the LIP. Both parties agree to work in collaboration to develop and agree appropriate delivery plans for transport schemes in Merton when there is greater clarity over TfL's future funding situation.

Timetable for review and ongoing cooperation

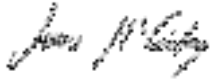
34. This statement has been informed by on-going engagement between the parties and has been informed by various evidence base documents. Merton and TfL Officers are in regular contact on various strategic transport issues.
35. As this statement focuses on issues of relevance to Merton's Regulation 19 post examination it will only need further updating once work commences on any future revisions to the Local Plan. Ongoing collaboration between partners will continue through regular meetings on a one to one basis and through attendance at group meetings where strategic transport issues are discussed.

Governance arrangements

36. It will be for each authority to decide who is the appropriate person to sign the statement.

London Borough of Merton.

Signed: James McGinlay



Position: Assistant Director, Sustainable Communities, London Borough of Merton

Date: 2nd March 2022

Transport for London

Signed: Danny Calver



Position: Planning Manager, Spatial Planning, Transport for London

Date: 1st March 2022

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

Inspectors' letter:

54(f) Your view on the implications of the latest Housing Delivery Test results (see paragraphs 16 and 17)

16. *The Department of Levelling Up, Housing and Communities published the Housing Delivery Test (HDT) Results on 14 January 2021 - which indicate that Merton's HDT Measurement of delivery over the relevant period is 80%. The Council will be aware that paragraph 74(c) and footnote 41 of the Framework state that where delivery falls below 85% of the housing requirement, a 20% buffer should be applied when establishing whether a sufficient five year supply.*

17. *Whilst we note that the figures included in the HDT Results differ from the Council's assessment over the same period (included in Graph 2.1 of '11D10 Merton's Housing Delivery Test Action Plan'), we would welcome your views on the implications of the above considerations for the housing supply aspects of the Local Plan. You may also wish to reflect on whether any MMs may be required to achieve consistency with the Framework (paragraph 68(a) and footnote 34), insofar as it requires planning policies to identify a supply of specific, deliverable sites for years one to five of the plan period, with an appropriate buffer.*

Council response

- 6.1. The council's position is that we believe Merton's Housing Delivery Test (HDT) score should be 89%. This is because the HDT "*number of homes required*" for 2019/20 was changed between different years:
- The 2020 HDT published the "*2019/20 number of homes required*" = 377 new homes
 - The 2021 HDT published different data for the same year ("*2019/20 number of homes required*" = 526 new homes)
- 6.2. The measurement for FY2019-2020 was for 377 new homes in 2020 and this is based on 11 months of the London Plan 2016 target of 411 new homes, including includes government's allowance of a 1-month Covid reduction to take into account disruption caused by the Covid lockdown in March 2020 = 377 homes
- 6.3. However, in the Housing Delivery Test 2021 measurement, the FY2019-2020 requirement for Merton is stated as 526 new homes, but there is no explanation how this requirement was calculated and Merton cannot reconcile how it might relate to either the London Plan 2016 housing target of 411 (which was the adopted London Plan target in place until March 2021) or the new London Plan (March 2021) housing target of 918 new homes, following the steps in government's housing delivery test rulebook.

- 6.4. Therefore, LBM (London Borough of Merton) believes that for FY2019-2020 the “*number of homes required*” should be 377 new homes, as originally published in the HDT 2020 measurement.
- 6.5. **Table F1** below sets out these figures. Using the published HDT 2020 figures means that the council has a 2021 HDT measurement of 89%, which requires the council to prepare an action plan. This has already been done and submitted as [Document 11D10 Merton Housing Delivery Test Action Plan](#)
- 6.6. In reaching 89%, the council has also taken a conservative approach of using the HDT 2021 “*number of homes delivered*” figures, which we believe to be incorrect, albeit not significantly. The council has strongly supported evidence for the published delivery figures in successive Authority Monitoring Reports and conducts a wide range of primary data gathering exercises to ensure that the data we provide on the number of homes built in Merton each year is accurate, including:
- Site visits to usually more than 500 housing sites across Merton each year
 - Investigation of publicly available records such as Building Control, discharge of planning conditions etc.
 - Dialogue with landowners and developers on specific sites, particularly large sites or phased schemes.

Table F1 – comparison of Housing Delivery Test figures 2020, 2021

Merton	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2021 measurement	Housing Delivery Test: 2021 consequence
	2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
HDT 2021 figures	411	526	611	1549	250	346	643	1239	80%	Buffer
HDT 2020 figures	411	377	n/a		250	346	n/a			
LBM position	411	377	611	1399	273	375	603	1251	89%	Action Plan
Explanation	London Plan 2016	London Plan 2016 with 1-month Covid reduction	8 months of the London Plan 2021 target (in accordance with DLUHC Housing Delivery Test Technical Note)		Merton position housing delivery from published Document 0D28 Authority Monitoring Report	Merton position housing delivery from published Document 0D28 Authority Monitoring Report	Figures from draft Authority Monitoring Report – confirmed by email with GLA (Greater London Authority)			Action Plan already published - Document 11D10 Merton Housing Delivery Test Action Plan

- 6.7. Notwithstanding the above, the council proposes a **Main Modification** 1.1 (on page 349) using the latest and most up to date information on housing delivery to amend its stepped housing delivery target and housing trajectory as set out in (Strategic) Policy 11.2 Housing Provision.
- 6.8. The proposed new housing trajectory and the associated housing delivery target inserted as part of Main Modification 1.1 on page 349 also considers the Main Modification to start the Local Plan in 2022-23 and not 2021/22 as stated in Regulation 19.

- 6.9. With this up-to-date information, the council can demonstrate that it can achieve a 20% buffer on the five-year land supply, although we do not consider that this is necessary.
- 6.10. The London Plan housing needs are calculated from 2019/20 to 2028/29. For Merton, this is for 9,180 new homes over 10 years or an average of 918 new homes each year for 10 years.
- 6.11. Subject to Main Modifications being agreed, for plan-making purposes Merton's five-year land supply starts in 2022/23 and finishes in 2026/27
- 6.12. However, in calculating Merton's Local Plan needs, we also have to consider the fact that for the first three years 2019/20 to 2021/22 housing completions in Merton did not meet the housing needs (average 918 per year)

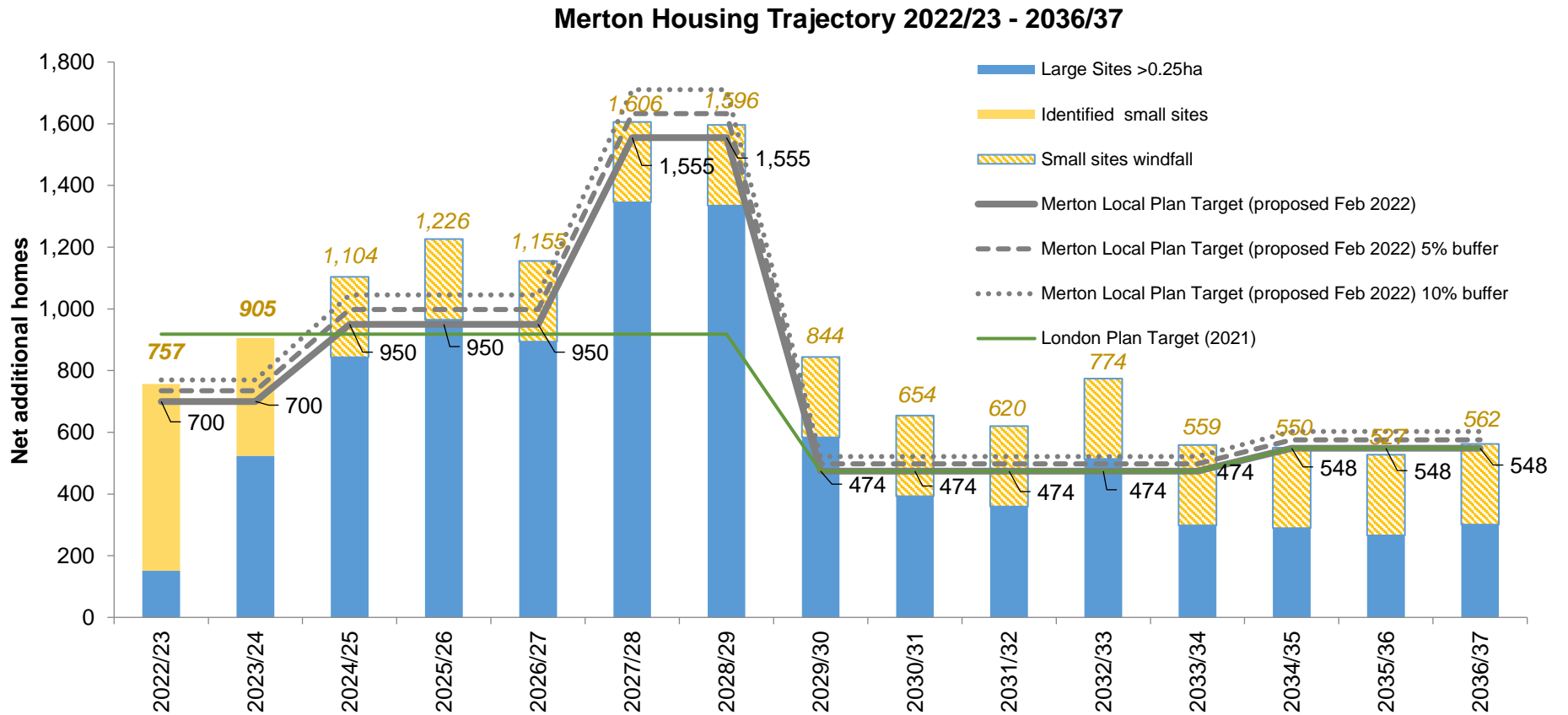
Table F2 calculation of any backlog to inform Merton's Local Plan housing needs

	2019/20	2020/21	2021/22	Total
Number of new homes built (projected completions for 2021/22)	375	603	848	1,826
Average London Plan target per year	918	918	918	2,754
Backlog (London Plan target minus number of homes built)	543	315	70	928

- 6.13. The backlog of 928 homes from the first three years then has to be accounted for in the remaining seven years of London Plan needs (2022/23 to 2028/29) as well as the existing target averaging 918 per year: 918 new homes for seven years plus the backlog of 928 means the council needs to build 7,354 new homes by 2028/29 to meet London Plan needs.
- 6.14. The council has continued to work with landowners and developers to demonstrate that there are specific, deliverable sites for years one to five of the Local Plan period (2022/23 to 2026/27) and developable sites to ensure the council meets its needs identified in the London Plan (7,354 new homes from 2022/23 until 2028/29) and to continue for fifteen years (2036/27).

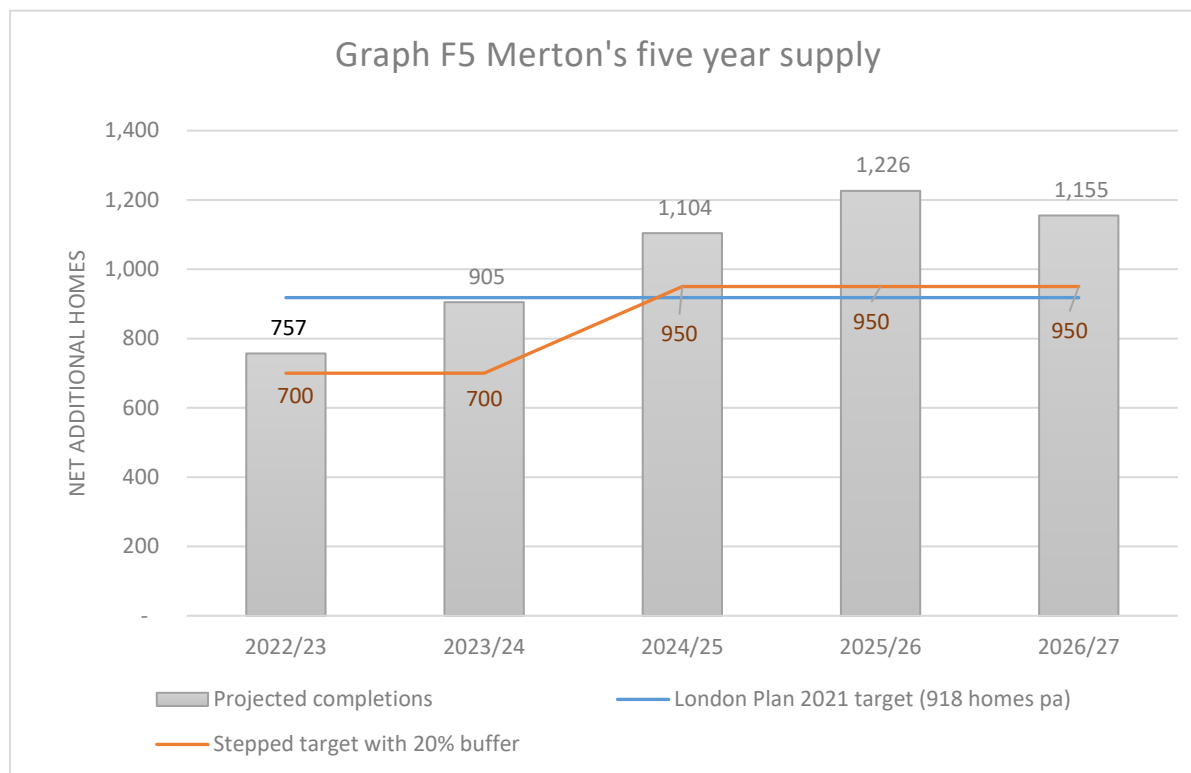
6.15. These sites will be delivered across the Local Plan period, and the council’s recommended Main Modifications to Strategic Policy H11.2 provides a stepped target within the housing trajectory to achieve this. The trajectory below (proposed to be included in the Main Modification) sets this out and it demonstrates that Merton is projected to complete more than 8,000 new homes by 2028/29, in excess of the 7,354 required to meet the London Plan’s need.

Graph F3 and Main Modification 1.1 on page 349



6.16. If this Main Modification is approved to adjust the stepped housing target to take account of the council's information on deliverable and developable sites across the Plan period, then Merton's five-year supply, then the first five years (2022/23 to 2026/27) of the Local Plan can be summarised in the graph below. This includes:

- The stepped housing target for the first five years, leading to a cumulative total of 4,250 new homes.
- A 20% buffer would be an extra 850 new homes on 4,250 new homes, or a cumulative total of 5,100 new homes by 2026/27



6.17. The five-year supply of specific deliverable sites across the five years projects a cumulative total of 5,147 new homes built, which is greater than the cumulative five-year target plus 20% buffer (5,100 new homes).

6.18. Therefore, although we do not consider that this is necessary, we can demonstrate that we can deliver a 20% buffer on the first five years of the Local Plan housing supply

6.19. Details on the specific deliverable sites that make up Merton's five-year supply are provided on the Inspectors pro-forma in response to paragraphs 41 and 42 of the Inspectors Preliminary Matter

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

Inspectors' letter:

54(g) Your view on the publication of the latest version of the Framework (see paragraphs 18 [to 21])

18. *The revised Framework was published on 20 July 2021 but, as set out above, the date that the Local Plan was published is unclear. Consequently, it may be appropriate for the Council to undertake a check (if not undertaken already), to confirm that the plan is consistent with the latest version of the Framework. The Council should supply us with the suggested wording for any MM (Main Modifications) which may be needed as a result. As a minimum, proposed changes should ensure that any references to superseded versions of the Framework, and out-of-date paragraph numbers should be updated as appropriate.*

Council response

- 7.1. As set out on page 1 of [OD8 Merton's local plan consultation statement](#) and clarified in response to Question 54(c), Regulation 19 (stage 3) of Merton's Local Plan was published on 22nd July 2021.
- 7.2. The draft NPPF was published for consultation between January and March 2021 and was finalised on 20th July 2021. Revisions to Merton's Local Plan to take account of the new (July 2021) NPPF were made between the NPPF publication on 20th July 2021 and Merton's Local Plan regulation 19 publication on 22nd July 2021.
- 7.3. The submitted Local Plan OD1 demonstrates that most of the references to the NPPF (including to specific paragraphs) relate to the July 2021 version. However, some references remain to the 2019 NPPF and the 2021 draft NPPF.
- 7.4. Fourteen Main Modifications are proposed to address this. 13 of the 14 Main Modifications proposed were submitted in December 2021 as Additional Modifications (reference AM2.2) in [Document OD4b Additional modifications](#) and are also illustrated in Document [OD4 Merton's Local Plan incorporating proposed modifications](#)
- 7.5. One of the fourteen Main Modifications is published now for the first time: to paragraph 3.1.10 (the supporting text of Policy N3.1 Colliers Wood) which is proposed to state "*In this circumstance, we would not be able to encourage new town centre uses in Colliers Wood as supporting large "out of centre" shops, offices and leisure development is contrary to the NPPF (National Planning Policy Framework) ~~2019-2021~~ (chapter 7), the London Plan and Merton's own planning policies.*
- 7.6. All the thirteen original Additional Modifications and the proposed modification to paragraph 3.1.10 above have been incorporated into the Main Modifications

Document 0D4a, dated March 2022, and resubmitted with our response to these questions.

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

Paragraph 54, (h)

Inspectors' letter:

54(h) The submission of a signed SoCG (Statements of Common Ground) with the GLA (Greater London Authority) covering the parties' positions on the suggested MM (Main Modifications) contained in document 0D4a (see paragraphs 19 to 21)

19 The provisions of s24 of the 2004 Act require the Local Plan to be in general conformity with the London Plan and for an opinion on general conformity to be requested from the Mayor of London.

20 GLA's letter dated 6 September 2021 sets out the Mayor's main areas of concern in these regards, which the Council has subsequently sought to address in the proposed changes contained in 0D4a. However, there are other points raised in the GLA's response where it is not clear whether they are pursued as matters of non-conformity or mere comments or advice.

21 We consider that further clarification of the GLA's position would be helpful at this stage, including in respect of the proposed MM contained in 0D4a, and whether they would satisfactorily address the issues of general conformity raised. This clarification would best be contained in a single comprehensive and up to date SoCG between the Council and the GLA, which should also highlight whether any areas of disagreement remain.

Council response

- 8.1. As set out in [submitted document 0D13 Merton's local plan duty to co-operate](#) and statements of common ground, and in our response to Question 54(e.) of this letter, Merton Council and the Greater London Authority have been working collaboratively together during the creation of Merton's Local Plan.
- 8.2. A Statement of Common Ground has been signed between the GLA and Merton Council, which addresses both the issues of general conformity raised in the GLA's September 2021 representation to Regulation 19 / Stage 3 (relating to tall buildings) and also the matters of general advice (relating to housing matters). It is proposed that this Statement of Common Ground is submitted with Merton's Local Plan as **Document 0D13a**.

- 8.3. Main Modifications (on taller buildings) and Additional Modifications (on the advice on housing matters) were proposed to address these issues, most of which were submitted with the Local Plan within [Document 0D4a Proposed Main Modifications](#) and are also visible in Document 0D4 [Merton's Local Plan incorporating proposed modifications](#)
- 8.4. However, in response to matters raised in the Inspectors' Preliminary Matters letter dated January 2022 and in response to the need for some further clarity, the modifications have been updated and Documents 0D4 and 0D4a dated March 2022 fully reflect the proposals in both the Statement of Common Ground with the GLA and other responses to the Inspectors' Preliminary Matters
- 8.5. There are no remaining areas of disagreement between the GLA and Merton Council regarding Merton's Local Plan.

Response to the Inspectors Preliminary Matters for the Council dated 28th January 2021.

Paragraph 54 (i) The production of a topic paper on the Local Plan's approach to First Homes (see paragraphs 22 to 24).

22. National policy on First Homes is set out in the above-referenced WMS (Written Ministerial Statement). The way that this topic will be considered in the examination is dependent on whether the Local Plan is subject to the transitional arrangements set out in the WMS, a matter that will be clearer to us once we have received confirmation of the plan's publication date.

23. Nevertheless, we note that paragraph 11.1.4 of the Local Plan refers to First Homes and indicates how Policy H11.1 could deliver these in line with the national policy expressed in the WMS.

24. In light of the above we would welcome your initial views on whether the Local Plan would accord with national policy in respect of First Homes in a brief topic paper. This should also cover whether the Local Plan is internally consistent on this issue when the contents of paragraph 11.1.9 are considered together with those of paragraph 11.1.4. The topic paper should provide a representative sample of hypothetical development scenarios, to test how the plan would fulfil the requirement for the minimum of 25% of all affordable housing units on site to be First Homes, and whether 10% of the total number of homes on a site would be available for affordable home ownership (per paragraph 65 of the Framework). The topic paper should also include the justification for any deviation from national policy in these regards. We would also appreciate the Council's view as to whether submitted evidence relating to the viability of the provision of affordable housing adequately covers the position relating to First Homes, or whether additional work may be required on this matter.

Merton Council response

9.1. It is considered that Merton's Local Plan fully accords with national policy in respect of First Homes and does not deviate in any regard.

9.2. On 24th May 2021, the Ministry of Housing, Communities and Local Government (MHCLG) published a written ministerial statement entitled *Affordable Homes Update (WMS)*, which included setting out the Government's plans for the delivery of First Homes. The issues covered by the WMS include:

- The definition of a First Home
- Eligibility criteria for First Homes
- Setting developer contributions for First Homes
- The remaining 75% of affordable housing secured through developer contributions
- Plans, development management and transitional arrangements
- Level of discount

- Exception sites
- Delivering Shared Ownership homes

9.3. The WMS came into effect on 28th June 2021.

9.4. The National Planning Policy Guidance contains guidance on First Homes, which was published in May 201 and subsequently updated in December 2021. Paragraph 18 sets out the transitional period and requirements for plan making and states:

As set out in the First Homes Written Ministerial Statement of 24 May 2021, local plans and neighbourhood plans that have reached advanced stages of preparation will benefit from transitional arrangements. Local plans and neighbourhood plans submitted for examination before 28 June 2021, or that have reached publication stage** by 28 June 2021 and subsequently submitted for examination* by 28 December 2021, will not be required to reflect the First Homes policy requirement.*

For areas that do not meet the criteria for transitional arrangements, new development plans, including local plans and neighbourhood plans, should take account of the new First Homes requirements from 28 June 2021.

9.5. Merton's Local Plan publication pre-submission date was 22nd July 2021 and it was submitted for examination to the Secretary of State on 2 December 2021. Merton's Local Plan is therefore not subject to the transitional arrangements. Therefore, in accordance with both the WMS and the national PPG (Planning Policy Guidance), Merton's Local Plan reflects the First Homes Policy requirement. Paragraph 11.1.14 of Merton's Local Plan states:

First Homes are a form of discounted market sales housing and to be considered as such must meet the requirements set out in the MHCLG Ministerial Statement published on 24th May 2021 Written statements - Written questions, answers, and statements - UK (United Kingdom) Parliament and the definition and eligibility requirements set out in National PPG Guidance First Homes - GOV.UK (www.gov.uk). First Homes are the government's preferred discounted market tenure and are required to account for at least 25% of all affordable housing homes delivered by developers through planning obligations. First Homes are an intermediate tenure therefore in accordance with government requirements, proposals for new homes will be considered against the intermediate tenure split element of Policy H11.1(Housing Choice).

9.6. Merton's Local Plan Policy H11.1(f) specifies the affordable housing tenure split requirement of 70% Low-cost rent and 30% Intermediate. Merton's Local Plan Policy H11.1(f) and paragraph 11.1.14 also comply with paragraph 65 of NPPF (National Planning Policy Framework) which states:

Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total

number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

- 9.7. It is the Council's position that the First Homes will be part of the intermediate proportion of affordable housing i.e. in place of or part or all of the affordable home ownership. Subject to developers meeting the 35% affordable housing provision requirement of Policy H11.1(f), the 30% intermediate element will always be sufficient to ensure that a minimum of 10% of the units are provided as affordable homes for sale.
- 9.8. The Council considers that the Local Plan is in accordance with national policy in respect of First Homes as detailed in this Topic Paper. To ensure internal consistency of the contents of paragraph 11.1.9 when considered together with those of paragraph 11.1.4 the Council proposes Additional Modification AM11.2a
- 9.9. Appendix A of this Topic Paper sets out a representative sample of hypothetical development scenarios, to test how the plan would fulfil the requirement for the minimum of 25% of all affordable housing units on site to be First Homes, and to demonstrate that 10% of the total number of homes on a site would be available for affordable home ownership (per paragraph 65 of the Framework).
- 9.10. The testing exercise set out in Appendix A of this Topic Paper demonstrates that the Council's approach to delivering First Homes (namely substituting First Homes for Shared Ownership units) will result in a broadly neutral impact on financial viability. Consequently, the submitted evidence relating to the viability of the provision of affordable housing adequately covers the position relating to First Homes and no additional work is required on this matter.

Appendix A of document 11D14 First Homes Topic Paper



LONDON BOROUGH OF MERTON - LOCAL PLAN RESPONSE TO INSPECTOR'S PRELIMINARY QUESTIONS

1. Introduction

In December 2021, the London Borough of Merton ('the Council') has submitted its draft Local Plan to the Planning Inspectorate for examination. The Inspectors have issued their preliminary questions on the plan which include First Homes. The Inspectors' questions are as follows:

"22. National policy on First Homes is set out in the above-referenced WMS. The way that this topic will be considered in the examination is dependent on whether the Local Plan is subject to the transitional arrangements set out in the WMS, a matter that will be clearer to us once we have received confirmation of the plan's publication date.

23. Nevertheless, we note that paragraph 11.1.4 of the Local Plan refers to First Homes and indicates how Policy H11.1 could deliver these in line with the national policy expressed in the WMS.

24. In light of the above we would welcome your initial views on whether the Local Plan would accord with national policy in respect of First Homes in a brief topic paper. This should also cover whether the Local Plan is internally consistent on this issue when the contents of paragraph 11.1.9 are considered together with those of paragraph 11.1.4. The topic paper should provide a representative sample of hypothetical development scenarios, to test how the plan would fulfil the requirement for the minimum of 25% of all affordable housing units on site to be First Homes, and whether 10% of the total number of homes on a site would be available for affordable home ownership (per paragraph 65 of the Framework). The topic paper should also include the justification for any deviation from national policy in these regards. We would also appreciate the Council's view as to whether submitted evidence relating to the viability of the provision of affordable housing adequately covers the position relating to First Homes, or whether additional work may be required on this matter".

2. First Homes requirement

The 2021 Planning Practice Guidance on First Homes indicates that First Homes:

- a) Must be discounted by a minimum of 30% against the market value;
- b) Are to be sold to persons meeting certain eligibility criteria;
- c) Will ensure that the initial discount is passed onto subsequent qualifying purchasers secured by a covenant on the title;
- d) Are to be sold at a maximum price (after discount) of £420,000.

3. Implementing First Homes in Merton

The Council has confirmed that the requirement for First Homes will be implemented by substituting the current requirement for 30% of the affordable housing with 25% First Homes and a balance of 5% to be provided as Shared Ownership. The remaining 70% of the affordable housing will be provided as London Affordable Rented housing.

4. Relative values generated by First Homes and Shared Ownership

Given that the First Homes requirement will simply replace units in another affordable tenure, the impact of the requirement depends on the relative values generated by Shared Ownership and First Homes.

The Merton Local Housing Plan Housing Viability Study (August 2020) utilises a range of sales values for private housing, reflective of evidence of achieved values in developments across the Borough. This range is summarised in Table 4.1.



Table 4.1: Private housing sales value range

Value Band	Value per square metre
A	£4,500
B	£5,200
C	£6,000
D	£6,700
E	£7,500
F	£8,200
G	£8,900
H	£9,600
I	£10,300

In order to ensure that Shared Ownership units are affordable to households in receipt of incomes not exceeding those identified in Table 6.19.1 of the Local Plan Housing Viability Study¹, the capital value attributed to shared ownership units is capped at £3,940 per square metre. The range of values that a developer will receive from a Registered Provider ('RP') for completed shared ownership units is summarised in Table 4.2.

Table 4.2: Value payable to developers by RPs for shared ownership units

Value Band	Value payable by RP to developer for completed shared ownership units
A	£3,150
B	£3,640
C	£3,940
D	£3,940
E	£3,940
F	£3,940
G	£3,940
H	£3,940
I	£3,940

In order to comply with the criteria set out in the PPG, First Homes will need to be sold at a price not exceeding £420,000 after the discount has been applied. In order to arrive at a set of per square metre values for comparison purposes, we have used a one bed unit to reflect the most typical type of unit that developers will provide as First Homes. Table 4.3 summarises the unrestricted market value for a one bed First Home in each value band to identify (a) the value after the discount has been applied and (b) the value per square metre that the unit would generate.

¹ £50,000 for 1 bed units; £70,000 for 2 bed units; and £90,000 per annum for 3 bed units.



Table 4.3: Values generated by one bed First Homes

Value Band	Value per square metre	Unrestricted market value of FHs	London FH cap	FH percentage discount	FH value after 30% discount	FH value per square metre
A	£4,500	£252,000	£420,000	30%	£176,400	£3,150
B	£5,200	£291,200	£420,000	30%	£203,840	£3,640
C	£6,000	£336,000	£420,000	30%	£235,200	£4,200
D	£6,700	£375,200	£420,000	30%	£262,640	£4,690
E	£7,500	£420,000	£420,000	30%	£294,000	£5,250
F	£8,200	£459,200	£420,000	30%	£321,440	£5,740
G	£8,900	£498,400	£420,000	30%	£348,880	£6,230
H	£9,600	£537,600	£420,000	30%	£376,320	£6,720
I	£10,300	£576,800	£420,000	30%	£403,760	£7,210

Comparing the values in tables 4.2 and 4.3, one can note that the values generated by First Homes will be significantly higher in most cases in comparison to the values generated by Shared Ownership. This is because the only affordability criteria set for First Homes is that the discounted value must not exceed £420,000. In contrast, the Council's affordability criteria for Shared Ownership applies a maximum household income of £50,000, resulting a lower maximum property purchase price.

5. The Impact on substituting First Homes for Shared Ownership units in the viability assessment

Given that income to the developer will be no lower than it would have received for Shared Ownership units, the Gross Development Value ('GDV') of schemes should be unaffected by substituting some or all of the Shared Ownership units with First Homes. Indeed, the GDV should increase as a result of First Homes replacing some or all of the Shared Ownership units. We provide two worked examples overleaf in tables 5.1 and 5.2.

In example 1, the scheme provides a total of 200 units, 35% of which are provided as affordable housing (equating to 70 units). In order to meet the PPG requirement for 10% of total homes to be provided as First Homes, a minimum of 20 First Homes would be required. This would equate to 29% of the affordable homes, which would satisfy the PPG requirement that at least 25% of the affordable homes are provided as First Homes.

The GDV of the scheme with a traditional affordable housing mix of 70% rented and 30% shared ownership is £64,762,145 in Value Band D. With the First Homes requirement, the GDV increases to £65,677,895.

Similar increases result in Example 2, which assumes an overall affordable housing provision of 25%.

Further examples are provided with smaller numbers of units (examples 3, 4 and 5) which all assume provision of 35% affordable housing (or nearest equivalent percentage due to rounding up).

Table 5.1: Example 1 (200 units, 35% affordable housing)

				Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	130	7,936.50	£4,500	£35,714,250	£6,700	£53,174,550	£10,300	£81,745,950
Social Rent	61.05	49	2,991.45	£2,185	£6,536,318	£2,185	£6,536,318	£2,185	£6,536,318
Shared ownership	61.05	21	1,282.05	£3,150	£4,038,458	£3,940	£5,051,277	£3,940	£5,051,277
		200			£46,289,026		£64,762,145		£93,333,545

Revised housing mix incorporating First Homes

			Value Band:	Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	130	7,936.50	£4,500	£35,714,250	£6,700	£53,174,550	£10,300	£81,745,950
Social Rent	61.05	49	2,991.45	£2,185	£6,536,318	£2,185	£6,536,318	£2,185	£6,536,318
First Homes	61.05	20	1,221.00	£3,150	£3,846,150	£4,690	£5,726,490	£7,210	£8,803,410
Shared ownership	61.05	1	61.05	£3,150	£192,308	£3,940	£240,537	£3,940	£240,537
		200			£46,289,026		£65,677,895		£97,326,215

Table 5.2: Example 2 (200 units, 25% affordable housing)

				Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	150	9,157.50	£4,500	£41,208,750	£6,700	£61,355,250	£10,300	£94,322,250
Social Rent	61.05	35	2,136.75	£2,185	£4,668,799	£2,185	£4,668,799	£2,185	£4,668,799
Shared ownership	61.05	15	915.75	£3,150	£2,884,613	£3,940	£3,608,055	£3,940	£3,608,055
		200			£48,762,161		£69,632,104		£102,599,104

Revised housing mix incorporating First Homes

			Value Band:	Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	150	9,157.50	£4,500	£41,208,750	£6,700	£61,355,250	£10,300	£94,322,250
Social Rent	61.05	30	1,831.50	£2,185	£4,001,828	£2,185	£4,001,828	£2,185	£4,001,828
First Homes	61.05	20	1,221.00	£3,150	£3,846,150	£4,690	£5,726,490	£7,210	£8,803,410
Shared ownership	61.05	-	-	£3,150	-	£3,940	-	£3,940	-
		200			£49,056,728		£71,083,568		£107,127,488

Table 5.3: Example 3 (100 units, 35% affordable housing)

	Ave Unit area sqm	No of units	Net Internal Area sqm	Value Band: A		Value Band: D		Value Band: I	
				Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	65	3,968.25	£4,500	£17,857,125	£6,700	£26,587,275	£10,300	£40,872,975
Social Rent	61.05	25	1,526.25	£2,185	£3,334,856	£2,185	£3,334,856	£2,185	£3,334,856
Shared ownership	61.05	10	610.50	£3,150	£1,923,075	£3,940	£2,405,370	£3,940	£2,405,370
		100			£23,115,056		£32,327,501		£46,613,201

Revised housing mix incorporating First Homes

	Ave Unit area sqm	No of units	Value Band: Net Internal Area sqm	Value Band: A		Value Band: D		Value Band: I	
				Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	65	3,968.25	£4,500	£17,857,125	£6,700	£26,587,275	£10,300	£40,872,975
Social Rent	61.05	25	1,526.25	£2,185	£3,334,856	£2,185	£3,334,856	£2,185	£3,334,856
First Homes	61.05	10	610.50	£3,150	£1,923,075	£4,690	£2,863,245	£7,210	£4,401,705
Shared ownership	61.05	-	-	£3,150	£0	£3,940	£0	£3,940	£0
		100			£23,115,056		£32,785,376		£48,609,536

Table 5.4: Example 4 (50 units, 35% affordable housing)

				Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	32	1,953.60	£4,500	£8,791,200	£6,700	£13,089,120	£10,300	£20,122,080
Social Rent	61.05	13	793.65	£2,185	£1,734,125	£2,185	£1,734,125	£2,185	£1,734,125
Shared ownership	61.05	5	305.25	£3,150	£961,538	£3,940	£1,202,685	£3,940	£1,202,685
		50			£11,486,863		£16,025,930		£23,058,890

Revised housing mix incorporating First Homes

			Value Band:	Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	32	1,953.60	£4,500	£8,791,200	£6,700	£13,089,120	£10,300	£20,122,080
Social Rent	61.05	13	793.65	£2,185	£1,734,125	£2,185	£1,734,125	£2,185	£1,734,125
First Homes	61.05	5	305.25	£3,150	£961,538	£4,690	£1,431,623	£7,210	£2,200,853
Shared ownership	61.05	-	-	£3,150	£0	£3,940	£0	£3,940	£0
		50			£11,486,863		£16,254,868		£24,057,058

Table 5.5: Example 5 (30 units, 35% affordable housing)

				Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	19	1,159.95	£4,500	£5,219,775	£6,700	£7,771,665	£10,300	£11,947,485
Social Rent	61.05	8	488.40	£2,185	£1,067,154	£2,185	£1,067,154	£2,185	£1,067,154
Shared ownership	61.05	3	183.15	£3,150	£576,923	£3,940	£721,611	£3,940	£721,611
		30			£6,863,852		£9,560,430		£13,736,250

Revised housing mix incorporating First Homes

			Value Band:	Value Band: A		Value Band: D		Value Band: I	
	Ave Unit area sqm	No of units	Net Internal Area sqm	Value psm	GDV	Value psm	GDV	Value psm	GDV
Private units	61.05	19	1,159.95	£4,500	£5,219,775	£6,700	£7,771,665	£10,300	£11,947,485
Social Rent	61.05	8	488.40	£2,185	£1,067,154	£2,185	£1,067,154	£2,185	£1,067,154
First Homes	61.05	3	183.15	£3,150	£576,923	£4,690	£858,974	£7,210	£1,320,512
Shared ownership	61.05	-	-	£3,150	£0	£3,940	£0	£3,940	£0
		30			£6,863,852		£9,697,793		£14,335,151



6. Conclusions

The exercise above demonstrates that the Council's approach to delivering First Homes (namely substituting First Homes for Shared Ownership units) will result in a broadly neutral impact on financial viability.

Consequently, the submitted evidence relating to the viability of the provision of affordable housing adequately covers the position relating to First Homes and no additional work is required on this matter.

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

54(l) The provision of supporting information in respect of the indicative list of transport schemes included in Table 16.1 of the Local Plan (see paragraph 36)

Sustainable Travel

36. For the 'Indicative list of transport schemes' listed in Table 16.1 on page 580 of the Local Plan, we would appreciate submission of a table which clarifies the status of these schemes, including the planning position, level of funding committed and anticipated delivery timescale. The table should be supported by documentary evidence where relevant and available, and you may also wish to point to material already provided such as '16D1 The Merton Local Implementation Plan', and '14D4 The Infrastructure Delivery Plan' in your response. Where possible, SoCG on specific items with the relevant transport bodies and any other parties with an interest in the delivery of specific sites should be produced.

Council response

1. The indicative list of transport schemes (Table 16.1) has been amended and updated to provide additional information on the status of the schemes, sources of funding and anticipated delivery timescales. This has been included below for reference and modifications are also proposed to the Local Plan to include this additional and updated information.
2. TfL has a direct responsibility for or will be involved in the delivery of a number of the schemes set out in table 16.1, which are also included in table 10.1 of the London Plan and set out in more detail in the Mayor's Transport Strategy, which provides documentary evidence.
3. In relation to the committed funding and anticipated delivery timescales, the impact of the Covid-19 pandemic on TfL's financial situation has led to significant uncertainties in relation to the future funding availability and delivery of transport schemes in London. This includes an impact on the delivery by TfL of transport scheme proposals set out in the MTS, which may be delayed or indefinitely postponed, such as Crossrail 2 and Sutton Link. There also continues to be uncertainty around the future allocation of annual funding by TfL to Merton to deliver local transport schemes as set out in the Local Implementation Plan, which could particularly impact on the delivery of schemes that contribute towards the cycling and walking networks. However, the Government's decarbonising transport strategy, published in 2021 sets out a strong commitment to active travel by setting the aim that half of all journeys in towns and cities will be cycled or walked by 2030. It is therefore reasonably anticipated that beyond the current period of uncertainty, funding will be made available to

boroughs via some mechanism to deliver the necessary cycling and walking infrastructure.

4. A Statement of Common Ground has been developed and signed between TfL and Merton Council which includes the latest position on proposed transport schemes in Merton with TfL involvement. It is proposed that this Statement of Common Ground is submitted with Merton's Local Plan as Document 0D13g Transport for London Merton Statement of Common Ground. There are no areas of disagreement between the TfL and Merton Council regarding Merton's Local Plan, including the proposed transport schemes.

Table 16.1: Indicative list of transport schemes

Proposal Number, Scheme and Location	Proposal Description, Status, Timescale and Funding
TN 1 Crossrail 2	<p>Strategic infrastructure proposal for new underground rail line running across London between Wimbledon and New Southgate/Tottenham Hale with potential ground level links to the wider rail network.</p> <p><u>This scheme is currently unfunded and will not be completed in the lifetime of this Local Plan. Existing safeguarding of the scheme is retained -</u> for the current status and safeguarding of land see https://crossrail2.co.uk</p>
TN 2 Rail Service Improvements	<p>Enhanced suburban rail services, particularly to improve the frequency on trains on the Wimbledon loop from 2 trains per hour to 4 train in each direction throughout the day.</p> <p><u>A study has been conducted by Network Rail (not yet formally published) that includes a proposal to increase the frequency of trains on the Wimbledon loop as a primary recommendation. Although no decision has been made or funding allocated at this stage, this could potentially be implemented by the late 2020s/early 2030s subject to post-COVID recovery and service specification.</u></p>
TN3 Underground upgrades	<p>Upgrades to Underground Services to improve capacity and quality of service.</p> <p><u>A proposed upgrade to the District Line that will increase frequencies to up to 16 trains per hour on the Wimbledon Branch is expected to be delivered by 2024.</u></p>

<p>TN4 Step-free access</p>	<p>Improved station accessibility for all users <u>at public transport stations.</u></p> <p><u>A step free access route for Haydon's Road Station has been secured through a planning application and Merton is working with the Rail Operator to provide enabling works. The scheme is expected to be completed by 2023.</u></p> <p><u>Includes Motspur Park has secured DfT Access for All funding, is in development and anticipated to be delivered by 2024. For further information see Access for All – improving accessibility at railway stations nationwide - Network Rail. in feasibility /design stage (funded).</u></p> <p><u>Proposals to safeguard Wimbledon Chase Station redevelopment to ensure step free access can be delivered in the future.</u></p> <p><u>Other stations do not have funding secured but consideration will be given to submitting bids for future rounds of Access for All funding in collaboration with Network Rail and Rail Operators. All development sites that could impact on or enable step free access will be required to safeguard potential future routes and schemes, including any redevelopment of Wimbledon Chase Station.</u></p>
<p>TN 5 Sutton Link – Sutton town centre to Colliers Wood</p>	<p>Proposal for a new tram route (unfunded) between Sutton and Colliers Wood. Currently unfunded and unlikely to be completed in the lifetime of this Local Plan. See https://consultations.tfl.gov.uk/trams/sutton-link</p>
<p>TN 6 Improvements to existing Wimbledon to Croydon Tram service</p>	<p>Service improvements including step free access from Dorset Road to Morden Road Tram stop, replacing existing single track with double tracks between Phipps Bridge and Morden Road Tram stops to increase capacity.</p> <p><u>The TfL proposal for twin tracking does not currently have funding allocated, but if funding is secured the current anticipated timescale for delivery is beyond 2031.</u></p>
<p>TN 7 Other tram improvements</p>	<p>Potential new Tram stop at Willow Lane to enhance public transport access to Willow Lane Industrial Estate. <u>This scheme does not form part of TfL's plans and has no allocated funding, so would only be progressed during the plan period as part of appropriate enabling development and in collaboration with TfL.</u></p> <p>Street running spur extension from Morden Road tram stop. Delivery will require reallocation of road space and local widening secured through negotiation with landowners as opportunities arise. <u>This scheme has no TfL funding currently allocated, but if funding is secured, timescales are anticipated to be beyond 2031.</u></p>
<p>TN 8 Bus Network improvements</p>	<p>Service enhancements to meet existing and future demand, accessible bus stops and bus stop improvements, bus priority schemes, decarbonisation of the bus fleet and exploration of demand-responsive bus services. <u>This is an ongoing annual programme which will be funded directly by TfL with potential S106 developer contributions towards specific service improvements linked to development proposals.</u></p>

<p>TN 9 Wimbledon Town Centre public realm improvements</p>	<p>Major scheme to improve the public realm and accessibility by cycling, walking and public transport, including improvements to the station. Will involve modification of one-way road system, reallocation of road space and schemes for sustainable management of deliveries and servicing.</p> <p><u>This major scheme will require a significant amount of funding from a combination of sources including TfL and/or Government grants, Strategic Community Infrastructure Levy funding and enabling development contributions. As set out the in Future Wimbledon SPD anticipated delivery timescales are from 2025 to 2040.</u></p>
<p>TN10 Morden Town Centre, London Road</p>	<p>Re-prioritisation of road space in favour of pedestrian, cyclists and public transport, improved Station access arrangements and public realm improvement and modification of one-way road system.</p> <p><u>This major scheme will require a significant amount of funding from TfL and enabling development schemes with an anticipated delivery timescale of late 2020s.</u></p>
<p>TN11 Borough-wide walking network</p>	<p>Improvements to the walking network including routes, lighting and crossing facilities <u>including the “missing link” along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth).</u></p> <p><u>Merton will develop a walking strategy by the end of 2023 which will set out more detailed proposals for pedestrian route development and will be implemented on an ongoing basis over the plan period. The programme will be funded by a combination of funding for transport schemes allocated to the borough by TfL and/or Government grants, Strategic Community Infrastructure Levy funding and S106 developer contributions towards specific schemes linked to development proposals.</u></p>
<p>TN12 Borough-wide cycle network</p>	<p>Development of a strategic network of cycle routes, including new feeder routes to the Cycle Superhighway <u>and including the “missing link” along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth)</u></p> <p><u>Merton will develop a cycling strategy by the end of 2023 which will set out more detailed proposals for cycle route development and will be implemented on an ongoing basis over the plan period. The programme will be funded by a combination of funding for transport schemes allocated to the borough by TfL and/or Government grants, Strategic Community Infrastructure Levy funding and S106 developer contributions towards specific schemes linked to development proposals.</u></p>
<p>TN 13 Cycle Parking and Hubs</p>	<p>Upgrades of existing cycle parking facilities and secure cycle parking hubs at Wimbledon, Colliers Wood, Mitcham and Morden.</p> <p><u>Merton will develop a cycling strategy by the end of 2023 which will set out more detailed proposals for cycle parking provision. Schemes will be implemented on an ongoing annual basis over the Local Plan period. The programme will be funded by a combination of funding for transport schemes allocated to the borough by TfL and/or Government grants, Strategic Community Infrastructure Levy funding and S106 developer contributions towards specific schemes linked to development proposals. Developers of key schemes in strategic locations may also be required to include cycle parking hubs within their development proposals.</u></p>
<p>TN 14 EV charging infrastructure</p>	<p>Development of a mix of EV charging infrastructure to facilitate the projected increase in EV ownership.</p> <p><u>Merton will develop a EV strategy by the end of 2022 which will set out more detailed proposals for the provision of EV charging infrastructure. Schemes will be implemented on an ongoing basis over the plan period, including through the provision of charging infrastructure secured through development proposals. The</u></p>

	<p><u>programme will be funded by a combination TfL and/or Government grants and developer and operator funded provision.</u></p>
--	---

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

54(m) A review of the Local Plan's approach to SPDs and related guidance taking into account the points raised in paragraphs 37 to 40;

37. Several policies require developments to meet requirements contained in supplementary planning documents (SPDs) or similar pieces of guidance. These and other pieces of guidance are not development plan documents (DPDs) and thus do not have the statutory force conferred on local plans by virtue of section 38(6) of the 2004 Act. Moreover, unlike local plans, SPDs are not subject to independent examination.

38 Whilst the Framework (in the Glossary) is clear that SPDs are capable of being material considerations, the PPG on Plan-making (paragraph:008) sets out that they should build upon and provide detailed advice or guidance on policies in an adopted local plan; and that as they do not form part of the development plan, they cannot introduce new policies into a development plan.

39 It follows that those policies in the Local Plan which require proposals to be in accordance with SPDs are unlikely to be justified, or in line with the legislative definition of local plans given in Regulations 2 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Regulations). Consequently, we ask whether you could assess the wording of policies contained in the Local Plan, in the light of the above considerations.

40 Following your considerations in this regard, we would welcome any suggestions for MM, which, whilst making appropriate reference to relevant SPDs and related guidance, are clear about their legitimate status in providing guidance on the implementation of the Local Plan's policies.

Council response

- 12.1. The council has reviewed all policies in the Local Plan and is recommending a main modification to ensure that the Local Plan is justified and in line with the legislative definition of Local Plans. Wherever it appears this Main Modification remove reference within policies to having to meet requirements contained in guidance or supplementary planning documents from the relevant policy and adds reference to the guidance or supplementary planning document in the supporting text (if not already included).
- 12.2. These Main Modifications are included in the Schedule of Main Modifications as Main Modification 2.2 wherever referenced.

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

Inspectors' letter:

54 (n) The information relating to housing sites expected to contribute to the Borough's five-year supply set out in paragraphs 41 and 42 above;

Housing supply

41. We will send under separate cover via the PO a 5 Year Housing Land Supply pro-forma, requesting information for every site that the Council assumes will contribute to the supply. Your response should include clear evidence on the planning status of sites, delivery intentions, site assessment work undertaken, viability, availability, infrastructure provision, and interdependencies with other proposals.

42. The Information supplied is intended to assist us in our task of assessing whether sites are 'deliverable' for the purposes of the Framework, in the interests of the efficiency of the examination process – and the work should be ready in good time so that it can be adequately discussed and tested at the relevant hearing sessions, and should be made available on the examination website. The information supplied should be capable of being readily updated during the course of the examination. Any implications of the Crossrail 2 programme on any Raynes Park sites anticipated to yield housing in the first five years of the plan period should be clearly articulated in your submissions on this matter (see paragraph 17.5.7 of the Local Plan). Also any implications of the HDT results mentioned above should be reflected in your response.

Council response – 6th March 2022

- 14.1. The Five Year Housing Supply Pro-Forma has been completed for every site that the Council assumes will contribute to the supply, including the matters raised in paragraphs 41 and 42 above. This will be submitted as **Document 0D11.15 Five Year Housing Supply ProForma**
- 14.2. In 2020 government announced that Crossrail2 will not receive further funding at this current time. Should government decide to restart Crossrail2 funding, then Crossrail2 would be delivered outside Merton's Local Plan period 2022-2037.
- 14.3. It should also be noted that the 2017 SHLAA findings included a scenario for Crossrail2; the housing targets in the London Plan 2021 are without the delivery of Crossrail2.
- 14.4. No Raynes Park site allocations that are affected by Crossrail2 are included within the first five years of the Local Plan.

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period completions (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
		7	Mitcham Park, Mitcham	CR4 4EN		20/P2623	-1.44	-1.44	-1.44					-1.44	Started
Land adj.		5	Cambridge Road, West Wimbledon	SW20 0SQ		15/P2177	1	1	1					1	Started
Garages Rear c 49-55			Barnes End, New Malden	KT3 6PB		17/P3991	1	1	1					1	Started
Land rear of	145		Claremont Avenue, New Malden	KT3 6QP		17/P2729	1	1	1					1	Started
	3		Pentlands Close, Mitcham	CR4 1HW		18/P1164	1	1	1					1	Started
	2		Abbotts Road, Mitcham	CR4 1JP		19/P0829	1	1	1					1	Started
	127		Ashbourne Road, Mitcham	CR4 2BF		19/P3744	1	1	1					1	Started
	9 D		Clarendon Road, Colliers Wood	SW19 2DX		19/P2945	1	1	1					1	Started
	164		Durham Road, West Wimbledon	SW20 0DG		18/P3673	1	1	1					1	Started
	30		Vectis Road, Tooting	SW17 9RG		20/P2287	1	1	1					1	Started
	54		Marryat Road, Wimbledon	SW19 5BD		19/P0893	1	1	1					1	Started
	41A		Streatham Road, Mitcham	CR4 2AD		17/P3001	1	1	1					1	Started
	23		Jersey Road, Tooting	SW17 9RQ		20/P2399	1	1	1					1	Started
	21 a		St Mary's Road, Wimbledon	SW19 7BZ		19/P2462	1	1	1					1	Started
	36		Grenfell Road, Mitcham	CR4 2BY		20/P3544	1	1	1					1	Started
	41		Cottenham Park Road, West Wimbledon	SW20 0SB		18/P2234	1	1	1					1	Started
	3		Thornton Hill, Wimbledon	SW19 4HU		20/P2528	1	1	1					1	Started
	34-40		Links Avenue, Morden	SM4 5AA		19/P0635	1	1	1					1	Started
	1		Manor Way, Mitcham	CR4 1EG		18/P1725	1	1	1					1	Started
	2		Lyveden Road, Tooting	SW17 9DU		21/P0928	1	1	1					1	Started
	12		Rustic Avenue, Streatham	SW16 6PD		20/P3821	1	1	1					1	Started
	20		Manor Road, Mitcham	CR4 1JA		20/P3596	1	1	1					1	Started
	2		Laings Avenue, Mitcham	CR4 3EP		18/P0553	1	1	1					1	Started
Land adj.	206		Seaforth Avenue, New Malden	KT3 6JW		20/P1347	1	1	1					1	Started
	1 a		Kenley Road, Merton Park	SW19 3JJ		18/P1356	1	1	1					1	Started
	9		Links Road, Tooting	SW17 9ED		19/P2432	1	1	1					1	Started
	171		Streatham Road, Mitcham	CR4 2AG		21/P1250	1	1	1					1	Started
	1		Leonard Avenue, Morden	SM4 6DW		21/P1268	1	1	1					1	Started
	11		Taylor Road, Mitcham	CR4 3JR		20/P3548	1	1	1					1	Started
	2		Vectis Gardens, Tooting	SW17 9RE		18/P2066	1	1	1					1	Started
	34		Lingfield Road, Wimbledon	SW19 4PZ		19/P3715	1	1	1					1	Started
Land Adj	57		Gore Road, Raynes Park	SW20 8JN		19/P2885	1	1	1					1	Started
	151		Effra Road, South Wimbledon	SW19 8PU		15/P0101	2	2	2					2	Started
	9		Bathgate Road, Wimbledon Village	SW19 5PW		15/P0636	2	2	2					2	Started
Garages rear of 30-40			Barnes End, New Malden	KT3 6PB		20/P0781	2	2	2					2	Started
High Range	2		Lansdowne Road, West Wimbledon	SW20 8AP		17/P3976	2	2	2					2	Started
	5		New Close, Colliers Wood	SW19 2SX		19/P2684	2	2	2					2	Started
	6 to 8		Upper Green East, Mitcham	CR4 2PA		19/P2947	2	2	2					2	Started
	102		Arthur Road, Wimbledon	SW19 7DT		18/P0892	2	2	2					2	Started
	5		Parkside Avenue, Wimbledon	SW19 5ES		20/P2610	2	2	2					2	Started
1A Frensham Court			Phipps Bridge Road, Mitcham	CR4 3PG		19/P2343	2	2	2					2	Started
	21		Rural Way, Streatham	SW16 6PF		17/P3153	2	2	2					2	Started
	116		Chestnut Grove, Mitcham	CR4 1RA		21/P1329	2	2	2					2	Started
	186		Martin Way, Morden	SM4 4AJ		19/P0146	2	2	2					2	Started
	82		High Street, Wimbledon	SW19 5EG		18/P3998	2	2	2					2	Started
	271-273		The Broadway, Wimbledon	SW19 1SD		20/P2161	2	2	2					2	Started
	3		Orchard Lane, Raynes Park	SW20 0SE		17/P3256	3	3	3					3	Started

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period completions (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
		41	Gorringe Park Avenue, Mitcham	CR4 2DH		19/P3474	3	3	3					3	Started
	94-98		Merton High Street	SW19 1BD		20/P1994	3	3	3					3	Started
		2 a	Milner Road, South Wimbledon	SW19 3AA		18/P0562	3	3	3					3	Started
	27-35		West Barnes Lane, Raynes Park	SW20 0BL		18/P1058	3	3	3					3	Started
		33	Lingfield Road, Wimbledon	SW19 4PZ		19/P2611	3	3	3					3	Started
Kingswood Hou	31-39		Miles Road, Mitcham	CR4 3DA		17/P3331	4	4	4					4	Started
		58	New Close, Colliers Wood	SW19 2SY		20/P1065	4	4	4					4	Started
		174	Grand Drive, Raynes Park	SW20 9NB		20/P0792	4	4	4					4	Started
		34	Langdale Avenue, Mitcham	CR4 4AF		20/P0087	4	4	4					4	Started
Alwyne Mansior	13-24		Alwyne Road, Wimbledon			17/P2397	4	4	4					4	Started
		7	Rural Way, Streatham	SW16 6PF		19/P1298	4	4	4					4	Started
Former		101	Hamilton Road, South Wimbledon			20/P2547	5	5	5					5	Started
Princes Road S		51	Prince's Road, Wimbledon	SW19 8RA		20/P3284	5	5	5					5	Started
	252-254		Haydons Road, South Wimbledon	SW19 8TT		19/P3271	6	6	6					6	Started
		190	London Road, Mitcham	CR4 3LD		19/P0428	6	6	6					6	Started
		15a, 15 & 17	Russell Road, Wimbledon	SW19 1QN		19/P3836	6	6	6					6	Started
		96 and 98	The Broadway, Wimbledon	SW19 1RH		15/P1569	6	6	6					6	Started
		61	Grand Drive, Raynes Park	SW20 9DJ		19/P2613	7	7	7					7	Started
Garages R/O		38	Inglemere Road, Mitcham	CR4 2BT		20/P1722	7	7	7					7	Started
		5	Bewley Street, London	SW19 1XF		18/P3139	7	7	7					7	Started
	138-140		Durnsford Road, Wimbledon Park	SW19 8HJ		21/P1697	7	7	7					7	Started
The Queens He		70	Cricket Green, Mitcham	CR4 4LA		17/P0253	8	8	8					8	Started
		2	Church Lane, Merton Park	SW19 3NY		19/P3400	8	8	8					8	Started
		87	Robinson Road, Tooting	SW17 9DN		20/P4086	8	8	8					8	Started
		361	Kingston Road, Raynes Park	SW20 8JX		19/P0808	9	9	9					9	Started
		641	Kingston Road, Raynes Park	SW20 8SA		18/P2207	9	9	9					9	Started
	131-135		Love Lane, Mitcham	CR4 3YA		21/P1138	9	9	9					9	Started
Brook Farm Ho		1	Station Road, Colliers Wood	SW19 2LP		20/P3385	9	9	9					9	Started
Unit 4 Waterfall		8	High Street, Colliers Wood	SW19 2AG		18/P0882	10	10	10					10	Started
		141	The Broadway, Wimbledon	SW19 1QJ		17/P0296	20	20			20			20	Started
	360-364		London Road, Mitcham (>272 & >277)	CR4 3ND		15/P3114	22	22			22			22	Started
Phoenix Hotel	123-125		Merton Road, South Wimbledon	SW19 1ED		20/P2729	22	22	22					22	Started
		159	Commonside East, Mitcham (187+)	CR4 2QB		20/P1060	24	24	24					24	Started
	64-76		Kingston Road, Wimbledon	SW19 1LA		19/P2120	26	26	26					26	Started
Units 2, 3 and 3	32-34		Bushey Road, Raynes Park	SW20 8BP		18/P2619	32	32	32					32	Started
Abbey Wall Works			Station Road, Colliers Wood	SW19 2LP		19/P4266	66	66			66			66	Started
Volante site	46-76		Summerstown, London	SW17 0BH	Wi12 (also as	15/P4798	93	93			93			93	Started
	579-589		Kingston Road, Raynes Park	SW20 8SD		19/P1676	118	118			59	59		118	Started
Land to the north and east of Marsh			High Path, South Wimbledon	SW19 2JL	In the 2018 E	16/P3738	134	134	134					134	Started
YMCA	196-200		The Broadway	SW19 1RY	Wi15	20/P1738	145	145			10	135		145	Started
Ravensbury Estate			Ravensbury Grove, Mitcham	CR4 4DL	In the 2018 E	19/P1845	179	179	54		51	74		179	Started
		66	Ridgway, Wimbledon	SW19 4RA		19/P4029	-4.11	-4.11	-4.11					-4.11	Not Started
Rose Court		34	Woodside, Wimbledon	SW19 7AN		15/P3293	-2	-2	-2					-2	Not Started
		9 A	The Grange, Wimbledon	SW19 4PT		20/P2882	-2	-2			-2			-2	Not Started
		30	Robinson Road, Tooting	SW17 9DW		19/P2943	-1	-1	-1					-1	Not Started
		70	High Street, Wimbledon	SW19 5EE		20/P0032	-1	-1	-1					-1	Not Started
Morden Lodge and ancillary buildin			Morden Hall Road, Morden	SM4 5JD		20/P3606	-1	-1			-1			-1	Not Started

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period completions (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
	201	A&B	South Park Road, Wimbledon	SW19 8RY		21/P0743	-1	-1			-1				-1 Not Started
	179 & 181		Graham Road, Wimbledon	SW19 3SL		21/P1411	-1	-1			-1				-1 Not Started
	30		Rayleigh Road, Wimbledon	SW19 3RF		21/P2255	-1	-1			-1				-1 Not Started
	209		Haydons Road, Wimbledon	SW19 8UA		21/P2391	-1	-1			-1				-1 Not Started
	62		Normanton Avenue, Wimbledon Park	SW19 8BB		21/P3769	-1	-1			-1				-1 Not Started
	1		Ridgway, Wimbledon	SW19 4RS		21/P3641	-1	-1			-1				-1 Not Started
	22		Home Park Road, Wimbledon Park	SW19 7HN		17/P3576	1	1	1						1 Not Started
	15		South Park Road, Wimbledon	SW19 8RR		18/P0671	1	1	1						1 Not Started
	32		Sheldrick Close, Colliers Wood	SW19 2UG		16/P2408	1	1	1						1 Not Started
Land rear of	105-111		Haydons Road, South Wimbledon	SW19 1HH		18/P3081	1	1	1						1 Not Started
	129		Haydon Park Road	SW19 8JH		18/P3693	1	1	1						1 Not Started
Land R/O	42		Tamworth Lane, Mitcham	CR4 1DA		18/P4168	1	1	1						1 Not Started
	4		Cavendish Road, Colliers Wood	SW19 2EU		18/P2254	1	1	1						1 Not Started
	69		Edenvale Road, Mitcham	CR4 2DP		18/P3794	1	1	1						1 Not Started
	1		Lower Downs Road, Raynes Park	SW20 8QF		19/P0122	1	1	1						1 Not Started
	21		Woodland Way, Mitcham	CR4 2DZ		18/P4341	1	1	1						1 Not Started
	10		Parkside Avenue, Wimbledon	SW19 5ES		18/P4548	1	1	1						1 Not Started
	12		Westway, Raynes Park	SW20 9LX		19/P0427	1	1	1						1 Not Started
	109		Central Road	SM4 5SQ		19/P0714	1	1	1						1 Not Started
	27		Cochrane Road, Wimbledon	SW19 3QP		19/P0702	1	1	1						1 Not Started
	2		Abbott Avenue, Raynes Park	SW20 8SQ		19/P2062	1	1	1						1 Not Started
	2		Coach House Lane, Wimbledon	SW19 5JY		19/P2465	1	1	1						1 Not Started
	139		Wandle Road, Morden	SM4 6AA		19/P1082	1	1	1						1 Not Started
	9		Chalgrove Avenue, Morden	SM4 5RB		17/P1362	1	1	1						1 Not Started
	113		Kingston Road, Wimbledon	SW19 1LT		19/P2448	1	1	1						1 Not Started
Maria Court	18		Commonside West, Mitcham	CR4 4HA		19/P0544	1	1	1						1 Not Started
	168		Rowan Road, Streatham	SW16 5JQ		19/P2873	1	1	1						1 Not Started
Garage Block R	205a-207		Kingston Road, Wimbledon	SW19 3NL		19/P2116	1	1	1						1 Not Started
	532 A		Kingston Road, Raynes Park	SW20 8DT		19/P2714	1	1	1						1 Not Started
	186		Martin Way, Morden	SM4 4AJ		19/P2612	1	1	1						1 Not Started
	147		Abbotts Road, Mitcham	CR4 1JZ		19/P2899	1	1	1						1 Not Started
Land Adjacent t	163 A		Mostyn Road, Merton Park	SW19 3LS		19/P1235	1	1	1						1 Not Started
	536		Kingston Road, Raynes Park	SW20 8DT		19/P2385	1	1	1						1 Not Started
	171		Hartfield Road, Wimbledon	SW19 3TH		19/P3767	1	1	1						1 Not Started
	14		The Drive, West Wimbledon	SW20 8TG		19/P4101	1	1	1						1 Not Started
	10		The Drive, West Wimbledon	SW20 8TG		20/P0282	1	1	1						1 Not Started
	23		London Road, Tooting	SW17 9JR		19/P2683	1	1	1						1 Not Started
	18		Devonshire Road, Colliers Wood	SW19 2EN		20/P0452	1	1	1						1 Not Started
	2		Elm Close, Raynes Park	SW20 9HX		20/P0489	1	1	1						1 Not Started
	80		Kingston Road	SW19 1LA		20/P0848	1	1	1						1 Not Started
	111		Kingston Road, Wimbledon	SW19 1LT		20/P0870	1	1	1						1 Not Started
	24		Middle Way, Streatham	SW16 4HN		20/P0901	1	1	1						1 Not Started
	17		Clarendon Grove, Mitcham	CR4 2PH		20/P1389	1	1	1						1 Not Started
	271, 271a and 273		Haydons Road, South Wimbledon	SW19 8TX		20/P0906	1	1	1						1 Not Started
	34		Cottenham Park Road, West Wimbledon	SW20 0SA		20/P1130	1	1	1						1 Not Started
	352-354		London Road, Mitcham	CR4 3ND		20/P0027	1	1	1						1 Not Started
	62		Grove Road, Mitcham	CR4 1SA		20/P1740	1	1	1						1 Not Started

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period completions (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
	206		Merton High Street	SW19 1AX		20/P1938	1	1	1						1 Not Started
	11		Botsford Road, Wimbledon Chase	SW20 9NP		20/P1467	1	1	1						1 Not Started
	24		Gladstone Road, Wimbledon	SW19 1QT		20/P1597	1	1	1						1 Not Started
	182 a		Merton High Street, Colliers Wood	SW19 1AY		19/P3201	1	1	1						1 Not Started
	180		Merton High Street, Colliers Wood	SW19 1AY		19/P3253	1	1	1						1 Not Started
	18		Homefield Road, Wimbledon	SW19 4QF		18/P4143	1	1	1						1 Not Started
	22		Lancaster Place	SW19 5DP		20/P2553	1	1	1						1 Not Started
	56		Byegrove Road, Colliers Wood	SW19 2AY		20/P2838	1	1	1						1 Not Started
	18		Eveline Road, Mitcham	CR4 3LE		20/P1221	1	1	1						1 Not Started
	5		Park Avenue Mews, Mitcham	CR4 2EL		20/P2366	1	1	1						1 Not Started
	30		Park Avenue, Mitcham	CR4 2EL		20/P3432	1	1	1						1 Not Started
	134		Merton Road, South Wimbledon	SW19 1EH		20/P1913	1	1	1						1 Not Started
	2 D		Walpole Road, Colliers wood	SW19 2BZ		20/P3208	1	1	1						1 Not Started
	39		Westway Close, Raynes Park	SW20 9LN		20/P2085	1	1	1						1 Not Started
	2		Downe Road, Mitcham	CR4 2JL		21/P4010	1	1			1				1 Not started
	108		Kingston Road	SW19 1LX		20/P3806	1	1			1				1 Not Started
	10		Ridgway, Wimbledon	SW19 4QN		20/P3611	1	1			1				1 Not Started
	270		Links Road, Tooting	SW17 9ER		20/P3450	1	1			1				1 Not Started
Ground Floor St	53		London Road, Tooting	SW17 9JR		20/P1742	1	1			1				1 Not Started
	73		Cavendish Road, Colliers Wood	SW19 2EY		20/P3965	1	1			1				1 Not Started
Garages Adj 19	19		Lewis Road, Mitcham			20/P2546	1	1			1				1 Not Started
	1		Orchard Close, Raynes Park	SW20 9HU		20/P2894	1	1			1				1 Not Started
	57 A		High Street, Wimbledon	SW19 5EE		20/P3532	1	1			1				1 Not Started
	38		Ashbourne Road, Mitcham	CR4 2BA		20/P2548	1	1			1				1 Not Started
	18 D		Ridgway, Wimbledon	SW19 4QN		21/P0008	1	1			1				1 Not Started
	292		West Barnes Lane, New Malden	KT3 6LU		19/P2591	1	1			1				1 Not Started
	61		Revelstoke Road, Wimbledon Park	SW18 5NL		21/P1365	1	1			1				1 Not Started
Land r/o	1		Firtree Avenue, Mitcham	CR4 2JP		20/P2290	1	1			1				1 Not Started
	12		Park Avenue, Mitcham	CR4 2EL		21/P0626	1	1			1				1 Not Started
	507		Kingston Road, Raynes Park	SW20 8SF		21/P0860	1	1			1				1 Not Started
	251 a		London Road, Mitcham	CR4 3NH		21/P0977	1	1			1				1 Not Started
Seoul House	9		Station Road, Motspur Park	KT3 6JJ		20/P2840	1	1			1				1 Not Started
VACANT PLOT 1	2		Gap Road, Wimbledon	SW19 8JG		20/P0303	1	1			1				1 Not Started
	106		Hill Road, Mitcham	CR4 2HS		21/P0660	1	1			1				1 Not Started
	1		Hengelo Gardens, Mitcham	CR4 4DP		21/P1548	1	1			1				1 Not Started
	55		Cavendish Avenue, New	KT3 6QJ		21/P1421	1	1			1				1 Not Started
	135		Bushey Road, Raynes Park	SW20 0JN		21/P0186	1	1			1				1 Not Started
	13		Crusoe Road, Mitcham	CR4 3LJ		21/P2120	1	1			1				1 Not Started
	1		Castle Way, Wimbledon	SW19 5JN		20/P2922	1	1			1				1 Not Started
	380		Kingston Road, Raynes Park	SW20 8LN		21/P1808	1	1			1				1 Not Started
Land Adjacent t	106		Gorringe Park Avenue, Mitcham	CR4 2DJ		21/P1714	1	1			1				1 Not Started
	3		Longthornton Road, Streatham	SW16 5QE		21/P1363	1	1			1				1 Not Started
	109-111		London Road, Mitcham	CR4 2JA		20/P3469	1	1			1				1 Not Started
	169		Seely Road, Tooting	SW17 9QX		21/P0832	1	1			1				1 Not Started
Garage Block			The Grange, Wimbledon	SW19 4PR		21/P2168	1	1			1				1 Not Started
	168		Links Road, Tooting	SW17 9ES		21/P0319	1	1			1				1 Not Started
rear of 40 &	40 a		Lambton Road, Raynes Park	SW20 0LP		21/P1442	1	1			1				1 Not Started

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period completions (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
	236		Lynmouth Avenue, Morden	SM4 4RP		21/P1986	1	1			1				1 Not Started
	21		Neath Gardens, Morden	SM4 6JN		21/P1546	1	1			1				1 Not Started
	7		Links Avenue, Morden	SM4 5AE		21/P2812	1	1			1				1 Not Started
	92		High Street, Colliers Wood	SW19 2BT		21/P1562	1	1			1				1 Not Started
	106		Park Avenue, Mitcham	CR4 2EP		21/P2564	1	1			1				1 Not Started
Chase Court	8 A		Bakers End, Wimbledon Chase	SW20 9ER		20/P3874	1	1			1				1 Not Started
	41		Approach Road, Raynes Park	SW20 8BA		20/P3304	1	1			1				1 Not Started
Maple Cottage	28		Arthur Road, Wimbledon	SW19 7DU		21/P2431	1	1			1				1 Not Started
	59		Colwood Gardens, Colliers Wood	SW19 2DS		21/P2091	1	1			1				1 Not Started
	97		Windermere Road, Streatham	SW16 5HE		21/P3066	1	1			1				1 Not Started
Land adjoining	1		Fox's Path, Mitcham	CR4 3DL		21/P3173	1	1			1				1 Not Started
	2 A		Oakwood Avenue, Mitcham	CR4 3DP		21/P3232	1	1			1				1 Not Started
Garage Block, H145&147			Springfield Avenue, Wimbledon Chase			21/P1463	1	1			1				1 Not Started
	290		Haydons Road, Wimbledon	SW19 8JZ		21/P1269	1	1			1				1 Not Started
Land Adjacent t	1		Lucien Road, Wimbledon Park	SW19 8EL		21/P1178	1	1			1				1 Not Started
	43 a		Hotham Road, Colliers Wood	SW19 1BS		21/P1582	1	1	1						1 Not Started
	42		Elmhurst Avenue, Mitcham	CR4 2HN		20/P0287	1	1	1						1 Not Started
Flat 2	582 A		Kingston Road, Raynes Park	SW20 8DN		21/P1182	1	1	1						1 Not Started
	288		London Road, Mitcham	CR4 3NB		21/P0648	1	1			1				1 Not Started
Rear of	65		Sherwood Park Road, Mitcham	CR4 1NB		21/P2609	1	1			1				1 Not Started
	11		Grand Drive, Raynes Park	SW20 0JB		21/P3332	1	1			1				1 Not Started
	290-302a		Kingston Road, Raynes Park	SW20 8LX		20/P3165	1	1			1				1 Not Started
Store Ro 94	94		Merton High Street, Hotham Road M	SW19 1BD		21/P1688	1	1	1						1 Not Started
	154		Graham Road, Wimbledon	SW19 3SJ		21/P1887	1	1	1						1 Not Started
	7		Cowdrey Road, Colliers Wood	SW19 8TU		21/P3383	1	1			1				1 Not Started
Ground Floor R	30		Durham Road, West Wimbledon	SW20 0TW		21/P1904	1	1			1				1 Not Started
	50		Faversham Road, Morden	SM4 6RE		21/P0896	1	1			1				1 Not Started
Oakleigh			Herbert Road, Wimbledon	SW19 3SH		21/P4072	1	1			1				1 Not Started
	208		Manor Road, Mitcham	CR4 1JF		21/P0742	1	1			1				1 Not Started
	7		North Gardens, London	SW19 2NR		21/P3955	1	1			1				1 Not Started
	87		Park Avenue, Mitcham	CR4 2ES		21/P3648	1	1			1				1 Not Started
	2		The Broadway, Wimbledon	SW19 1RF		21/P2792	1	1			1				1 Not Started
	36		Grand Drive, Raynes Park	SW20 0JT		21/P3749	2	1			2				2 Not Started
	29&30		Abbey Parade, Merton High Street	SW19 1DG		18/P1200	2	2	2						2 Not Started
	230		Rowan Road, Streatham	SW16 5HX		18/P2943	2	2	2						2 Not Started
	198		Queen's Road, Wimbledon	SW19 8LY		18/P3128	2	2	2						2 Not Started
Land East of	65		Sherwood Park Road, Mitcham			18/P3386	2	2	2						2 Not Started
	66		The Crescent, Wimbledon Park	SW19 8AN		19/P0125	2	2	2						2 Not Started
First And Second	2		The Broadway, Wimbledon	SW19 1RF		19/P1171	2	2	2						2 Not Started
	336		West Barnes Lane, New Malden	KT3 6NB		19/P1722	2	2	2						2 Not Started
Wimbledon Tan	26		Ridgway, Wimbledon	SW19 4QW		19/P2422	2	2	2						2 Not Started
Flats above shop 81-83			The Broadway, Wimbledon	SW19 1QE		19/P2072	2	2	2						2 Not Started
Wandle House	10		Riverside Drive, Mitcham	CR4 4SU		18/P4017	2	2	2						2 Not Started
	65		Ridgway, Wimbledon	SW19 4SS		18/P2948	2	2	2						2 Not Started
	144		Florence Road, Wimbledon	SW19 8TN		19/P2708	2	2	2						2 Not Started
	344		West Barnes Lane, New Malden	KT3 6NB		19/P2070	2	2	2						2 Not Started
	177-187		Arthur Road, Wimbledon	SW19 8AE		19/P4084	2	2	2						2 Not Started

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
	117		Pelham Road, Wimbledon	SW19 1NZ		20/P0205	2		2	2				2	Not Started
Land to the Rea	27		Leafield Road, Merton Park	SW20 9AG		19/P2382	2		2	2				2	Not Started
	18-24		Singleton Close, Tooting	SW17 9JY		19/P2289	2		2	2				2	Not Started
	75-77		Griffiths Road, Wimbledon	SW19 1NE		20/P0458	2		2	2				2	Not Started
Land Adjacent t	95		Devonshire Road, Colliers Wood	SW19 2EQ		20/P1399	2		2	2				2	Not Started
	1		Robinhood Close, Mitcham	CR4 1JN		20/P2016	2		2	2				2	Not Started
	562		Kingston Road	SW20 8DR		20/P2636	2		2	2				2	Not Started
	81		High Street, Wimbledon	SW19 5EG		20/P3352	2		2		2			2	Not Started
Units C & DE	19 A-F		Prince's Road, Wimbledon	SW19 8RQ		21/P0197	2		2		2			2	Not Started
Elm Grove Business Cen			Elm Grove, Wimbledon	SW19 4HE		20/P2095	2		2		2			2	Not Started
	8		Clement Road, Wimbledon	SW19 7RJ		21/P1278	2		2		2			2	Not Started
	63		MONKLEIGH ROAD, MORDEN	SM4 4EN		20/P0824	2		2		2			2	Not Started
	35		Florence Avenue, Morden	SM4 6EX		21/P1233	2		2		2			2	Not Started
	296		Coombe Lane, Raynes Park	SW20 0RW		20/P2235	2		2		2			2	Not Started
	45-47		Martin Way, Morden	SM4 4AH		21/P1936	2		2		2			2	Not Started
	1		Pentlands Close, Mitcham	CR4 1HW		21/P2405	2		2		2			2	Not Started
124 - 128 Haydn	27		Cochrane Road, Wimbledon	SW19 3QP		18/P2661	2		2	2				2	Not Started
124-128			Haydons Road, South Wimbledon	SW19 1AE		21/P0438	2		2		2			2	Not Started
	6		Ridge Road, Mitcham	CR4 2ET		21/P3521	2		2		2			2	Not Started
	41		Manor Road, Mitcham	CR4 1JG		21/P2734	2		2		2			2	Not Started
Alliance House	41		Epsom Road, Morden	SM4 5PR		21/P1785	2		2	2				2	Not Started
2a-2c			Prince George's Avenue, Raynes Park	SW20 8BH		21/P2558	2		2	2				2	Not Started
	89B		London Road, Morden	SM4 5HP		21/P2577	2		2	2				2	Not Started
	416		Durnsford Road, Wimbledon Park	SW19 8DZ		21/P0430	2		2		2			2	Not Started
	59 C		Robinson Road, Tooting	SW17 9DL		21/P4292	2		2		2			2	Not Started
	49		Queen's Road, Wimbledon	SW19 8NP		20/P2779	2.8		2.8		2.8			2.8	Not Started
Land to the rear	2 A		Amity Grove, Raynes Park	SW20 0LJ		18/P4148	3		3	3				3	Not Started
	58		Haynt Walk, Raynes Park	SW20 9NX		20/P1362	3		3	3				3	Not Started
rear of retail un	288		London Road	CR4 3NB		20/P2100	3		3	3				3	Not Started
	41		Streatham Road, Mitcham	CR4 2AD		20/P1847	3		3	3				3	Not Started
	14		New Close, Colliers Wood	SW19 2SY		21/P0085	3		3		3			3	Not Started
	340		West Barnes Lane, New Malden	KT3 6NB		21/P0070	3		3		3			3	Not Started
	33		Graham Road, Mitcham	CR4 2HB		21/P0628	3		3		3			3	Not Started
	240		Tamworth Lane, Mitcham	CR4 1DF		21/P0945	3		3		3			3	Not Started
Cavendish House			Cavendish Avenue, New Malden	KT3 6QQ		21/P1320	3		3	3				3	Not Started
	570		Kingston Road, Raynes Park	SW20 8DR		21/P1848	3		3		3			3	Not Started
	24		The Broadway, Wimbledon	SW19 1RE		20/P0555	3.44		3.44	3.44				3.44	Not Started
	152-154		Merton Road, South Wimbledon	SW19 1EH		21/P3499	4		4		4			4	Not Started
	15 & 16		York Road	SW19 8TP		18/P2966	4		4	4				4	Not Started
	1,2,3,4		Park Avenue Mews	CR4 2EL		19/P3937	4		4	4				4	Not Started
2A Park Avenue, 6, 7-8 and 9 Park Avenue			Park Avenue	CR4 2EL		20/P1301	4		4	4				4	Not Started
Ground Floor & 158-160			Arthur Road	SW19 8AQ		20/P1822	4		4	4				4	Not Started
	162-164		Arthur Road	SW19		20/P1979	4		4	4				4	Not Started
	59		Colwood Gardens, Colliers Wood	SW19 2DS		20/P0304	4		4	4				4	Not Started
	7		Elm Grove	SW19 4HE		21/P0021	4		4		4			4	Not Started
	94		The Broadway, Wimbledon	SW19 1RH		20/P3088	4		4	4				4	Not Started
	141-145		Cannon Hill Lane, Raynes Park	SW20 9BZ		20/P2396	4		4	4				4	Not Started

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period completions (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
Kings Arms Pub	260		London Road, Mitcham	CR4 3HD		19/P0328	4.44	4.44	4.44					4.44	Not Started
	2 B		Park Avenue, Mitcham			19/P2127	5	5	5					5	Not Started
	12		Ravensbury Terrace, Wimbledon Park	SW18 4RL		20/P1744	5	5	5					5	Not Started
	66		The Broadway, Wimbledon	SW19 1RQ		20/P2454	5	5	5					5	Not Started
	144-146		Durnsford Road, Wimbledon Park	SW19 8HJ		20/P3839	5	5			5			5	Not Started
Vista House & Prospect House			Chapter Way, Colliers Wood	SW19 2RE		20/P2841	5	5	5					5	Not Started
Vantage House	1		Weir Road, Wimbledon	SW19 8UX		17/P4219	5	5	5					5	Not Started
Vista House & Prospect House			Chapter Way, Colliers Wood	SW19 2RE		20/P2841	5	5			5			5	Not Started
	290-302a		Kingston Road, Raynes Park	SW20 8LX		20/P3168	5	5			5			5	Not Started
	64		London Road, Morden	SM4 5BE		21/P3384	5	5			5			5	Not Started
	192-202		Martin Way, Morden	SM4 4AJ		21/P1856	5	5			5			5	Not Started
	3		Mitcham Park, Mitcham	CR4 4EN		19/P0546	5.56	5.56	5.56					5.56	Not Started
	162 and 164		Hartfield Road, Wimbledon	SW19 3TQ		18/P2224	6	6	6					6	Not Started
	37&39		Cottenham Park Road, West Wimbledon	SW20 0SB		20/P1463	6	6	6					6	Not Started
Land Rear Of	60		Manor Road, Mitcham			20/P2259	6	6	6					6	Not Started
Deseret House	288 a		London Road, Mitcham	CR4 3NB		21/P0175	6	6			6			6	Not Started
	415-421		Durnsford Road, Wimbledon Park	SW19 8EE		20/P2294	6	6			6			6	Not Started
Land rear of	1 A		York Road, South Wimbledon	SW19 8TP		17/P2440	6	6	6					6	Not Started
The Warehouse	12		Ravensbury Terrace, Wimbledon Park	SW18 4RL		21/P2375	6	6	6					6	Not Started
	441		Commonside East, Mitcham	CR4 1HJ		21/P1863	6	6			6			6	Not Started
	50		Wimbledon Hill Road, Wimbledon	SW19 7PA		19/P3764	7	7	7					7	Not Started
Ground Floor Ju:	341		London Road	CR4 4BE		20/P1584	7	7	7					7	Not Started
	58-60		Durham Road	SW20 0TW		20/P3348	7	7			7			7	Not Started
	337-339		Haydons Road, Wimbledon	SW19 8LA		21/P2582	7	7	7					7	Not Started
	318		Worple Road, Raynes Park	SW20 8QU		21/P1792	7	7	7					7	Not Started
	4		Shrewton Road, Tooting	SW17 9HX		17/P3208	8	8	8					8	Not Started
	94		Gorringe Park Avenue, Mitcham	CR4 2DJ		21/P1842	8	8			8			8	Not Started
	2		Blenheim Road , Raynes Park	SW20 9BB		20/P1852	8	8			8			8	Not Started
	22-24		Caxton Road, South Wimbledon	SW19 8SJ		21/P3640	8	8			8			8	Not Started
Woodcock House			Gibbard Mews, Wimbledon Village	SW19 5BY		21/P2841	8	8	8					8	Not Started
	8		Lake Road, Wimbledon	SW19 7EL		18/P1052	9	9			9			9	Not Started
	8		Preshaw Crescent, Mitcham	CR4 3GA		19/P4118	9	9	9					9	Not Started
Marquis of Lorr	117		Haydons Road, South Wimbledon	SW19 1HH		20/P2297	9	9	9					9	Not Started
Fair Green Parade			London Road, Mitcham	CR4 3NA		20/P0823	9	9			9			9	Not Started
Land at rear of : 2 to 16			Woodville Road, Morden	SM4 5AF		20/P1091	9	9			9			9	Not Started
	227		Western Road, Colliers Wood	SW19 2QD		20/P1517	9	9			9			9	Not Started
Former Fire Station			Lower Green West	CR4 3GA		20/P0801	9	9			9			9	Not Started
Land on south side of road			Wyke Road, Raynes Park	SW20		20/P0945	9	9			9			9	Not Started
Dawood House	1		Caxton Road, South Wimbledon	SW19 8SJ		21/P2946	9	9			9			9	Not Started
Unit C and DElm Grove Business Ce			Elm Grove, Wimbledon	SW19 4HE		20/P4059	10	10	10					10	Not Started
White Hart Bacl	350		London Road, Mitcham	CR4 3ND		18/P2216	15	15			15			15	Not Started
Bennets Courtyard			Watermill Way, Colliers Wood	SW19 2RW		20/P3364	15	15			15			15	Not Started
Nonsuch House	31		Chapter Way, Colliers Wood	SW19 2RP		21/P1082	16	16			16			16	Not Started
Eltandia Hall Care Centre			Middle Way, Streatham	SW16 4HN		19/P0809	18	18	18					18	Not Started
	33-39		Upper Green East, Mitcham	CR4 2PF		19/P2747	18	18			18			18	Not Started
Shaftesbury Ho	2 A		Amity Grove, Raynes Park	SW20 0LJ		20/P3866	18	18			18			18	Not Started
Land West of	3 a		Ravensbury Lane, Morden Road, Mitc	CR4 4DH		18/P0458	25	25			25			25	Not Started

Site name	Street Number	Alpha Letter	Street Name	Postcode	Local plan ref (if relevant)	Planning application reference	Total capacity (net gain)	Plan period completions (2022/23-2036/37)	Five year completions 2022/23	Five year completions 2023/24	Five year completions 2024/25	Five year completions 2025/26	Five year completions 2026/27	Five year completions Total	Status
Former Barclay:	16-20		Morden Road,	SW19 3BN		21/P2028	26	26			26				26 Not Started
1 The Bungalow	225-231		Streatham Road,	SW16 6NZ		19/P0866	28	28			28				28 Not Started
Imperial Fields	Tooting and Mitcham Hub				Mo3	19/P4094	77	77				77			77 Not Started
Eddie Catz			42 Station Road	SW19 2LP		21/P1907	116	116			116				116 Not Started
Tesco car park	265		Burlington Road	KT3 4NE	RP3	19/P2387	456	456				256	200		456 Not Started

01 Type B- High Path estate regeneration

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	High Path Estate regeneration (phase 2)				
Local plan ref (if relevant)	None for this emerging local plan (but allocated in adopted Merton Estates Local Plan 2018)				
Total capacity	1578				
Plan period completions	0-15				
Five year completions	113				
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					113

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates Clarion Housing Group is the Developer as part of the estate regeneration of Eastfields, High Path and Ravensbury estates in Merton.</p> <p>Clarion are redeveloping three estates in Merton that they are the majority owners of, supported by the council. Engagement with council and residents since 2013/14 Outline permission granted for whole estate in April 2019; Phase 1 completing. High Path Phase 2 reserved matters granted permission in 2019. Council has adopted Estates Local Plan in February 2018 to support the regeneration of all three estates. Council also resolved CPO in principle (2018); waived elements of Merton’s Stock Transfer Agreement (September 2021) and considering details of CPO (scheduled for March 2022).</p> <p>Delivery programmes including anticipated start on site and build out rates are derived from dialogue with Clarion, are part of most recent September 2021 Clarion report and updated March 2022 as Compulsory Purchase Orders due to be considered by Merton’s Cabinet on 21 March 2022</p>
--

Current planning status and progress towards the submission of an application

- Estates local plan adopted in February 2018, allocating the three estates of Eastfields, High Path and Ravensbury for viability
- High Path Outline planning permission for 1578 homes and non-residential uses granted in April 2019
- Phase 1 (which had been granted full planning permission for 134 homes in October 2017) completing shortly
- Phase 2 granted reserved matters planning permission in September 2019 for 113 homes
- Phase 3 – Clarion has engaged on pre application discussions with the council and held community consultation events, most recently in January 2022

There are a total of seven phases delivering across c15 years

Progress with site assessment work

See link below to Merton's adopted Estates Local Plan

Site viability

See link below to September 2021 Cabinet Committee report – Clarion are continuing to deliver despite viability challenges and with the support of the council in waiving part of Merton's Stock Transfer Agreement which helps to improve viability.

Merton's Cabinet are due to consider Compulsory Purchase Orders for the three estates in March 2022, which is partly dependent on being able to demonstrate a viable scheme.

Availability: ownership, any existing uses, etc

The whole of High Path estate has 602 homes and some other facilities (i.e. a community room; two ball courts etc) Clarion own approx 60% of the existing estates. Since 2014 Clarion has been engaging residents (leaseholders, freeholders and their tenants) on the right to remain on the estate once regeneration has completed. Delivery addressed also in Examination in Public of Merton's Estates Local Plan. Council has resolved to support CPO in principle in February 2018 and is aiming for March 2022 to consider CPOs for High Path phases 2 and 3

Infrastructure provision

Thoroughly considered in adopted Estates Local Plan 2018; outline planning permission April 2019 (ref 17/P1721) and associated S106

Relevant information from the HELAA/SHLAA

Other evidence

- Link to Merton's Estates Local Plan adopted Feb 2018 [Estates Local Plan : Estates Local Plan | Merton Council](#)
- Link to Council report Feb 2018 on delivering Clarion's regeneration [2018-02-07 Council Delivering Clarion Regen vFINAL.pdf \(merton.gov.uk\)](#)
- Link to Outline Planning Permission granted for whole of High Path estate April 2019 (ref 17/P1721) <https://planning.merton.gov.uk/Northgate/PlanningExplorerAA/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=1000098159&XSLT=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/Menus/PL.xml&DAURI=PLANNING>
- Link to Phase 1 full permission granted 2017 (ref 16/P3738 (now nearly complete)) <https://planning.merton.gov.uk/Northgate/PlanningExplorerAA/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=1000095463&XSLT=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/Menus/PL.xml&DAURI=PLANNING>
- Link to Phase 2 full permission granted Sept 2019 (ref 19/P1852) <https://planning.merton.gov.uk/Northgate/PlanningExplorerAA/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=1000106688&XSLT=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/Menus/PL.xml&DAURI=PLANNING>
- Link to Phase 3 pre application public consultation material (for events in January 2022) https://clarionconsults.co.uk/highpath_phase3/widgets/41425/documents
- Link to Clarion improved plans for phases 4-7 https://clarionconsults.co.uk/highpath_phases_4-7
- Link to Clarion's website on High Path regeneration <https://www.myclarionhousing.com/my-community/regeneration-projects/merton-london/high-path>
- Link to Merton Council September 2021 report waiving part of the stock transfer agreement to support regeneration [Appx B - Cabinet report 6 Sept21 support for Clarion estate regen inc all appendices.pdf \(merton.gov.uk\)](#)

02 Type B sites – Madeira Road (north of 11-17) aka The Canons

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Madeira Road (north of 11-17) aka The Canons					
Local plan ref (if relevant)	Mi5					
Total capacity	18					
Plan period completions	0-5					
Five year completions	18					
	2021/2	2022/3	2023/4	2024/5	2025/6	2026/7
Completions				18		

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

Council owned site; resolved for planning permission for residential (2020) and disposal (2021).

Proposed for site allocation in Merton's new Local Plan as Mi15 Part of four site achieving planning permission in July 2020; approved for disposal by Merton's Cabinet in December 2021.

Council's timeline: planning permission resolved to be granted in July 2020; disposal approved December 2021; disposal to be completed summer 2022; S106 signed late 2022; construction 2023/24 and completions 2024/25

Current planning status and progress towards the submission of an application

Council owned site. Part of four council-owned sites resolved for grant of planning permission on 17th July 2020 by the council's former development company, Merantun Developments Ltd:

- Madeira Road / The Canons (19/P4050)
- Raleigh Gardens car park (19/P4048)

<ul style="list-style-type: none">- Elm Nursery car park (19/P4047)- Farm Road church (19/P4046)
Progress with site assessment work Site assessment work carried out as part of planning application resolved to be granted permission
Site viability Site viability work carried out as part of planning application resolved to be granted permission July 2020
Availability: ownership, any existing uses, etc Council owned. In December 2021 council approved disposal of all four sites
Infrastructure provision Addressed within planning application – no significant dependencies
Relevant information from the HELAA/SHLAA
Other evidence Link to planning application details for - Madeira Road / The Canons (19/P4050) Link to Merton's Planning applications committee 17th July 2020 resolved to approve 19/P4050 Link to Merton's Cabinet decision December 2021 to dispose of sites (agenda item 7)

03 Type B sites – Raleigh Gardens car park

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Raleigh Gardens car park					
Local plan ref (if relevant)	Mi11					
Total capacity	36					
Plan period completions	0-5					
Five year completions	36					
	2021/2	2022/3	2023/4	2024/5	2025/6	2026/7
Completions				36		

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

Council owned site; resolved for planning permission for residential (2020) and disposal (2021).

Proposed for site allocation in Merton's new Local Plan as Mi11 Part of four site achieving planning permission in July 2020; approved for disposal by Merton's Cabinet in December 2021.

Council's timeline: planning permission resolved to be granted in July 2020; disposal approved December 2021; disposal to be completed summer 2022; S106 signed late 2022; construction 2023/24 and completions 2024/25

Current planning status and progress towards the submission of an application

Council owned site. Part of four council-owned sites resolved for grant of planning permission on 17th July 2020 by the council's former development company, Merantun Developments Ltd:

- Madeira Road / The Canons (19/P4050)
- Raleigh Gardens car park (19/P4048)

<ul style="list-style-type: none"> - Elm Nursery car park (19/P4047) - Farm Road church (19/P4046)
<p>Progress with site assessment work Site assessment work carried out as part of planning application resolved to be granted permission</p>
<p>Site viability Site viability work carried out as part of planning application resolved to be granted permission July 2020</p>
<p>Availability: ownership, any existing uses, etc Council owned. In December 2021 council approved disposal of all four sites</p>
<p>Infrastructure provision Addressed within planning application – no significant dependencies</p>
<p>Relevant information from the HELAA/SHLAA</p>
<p>Other evidence</p> <p>Link to planning application details for Raleigh Gardens car park (19/P4048)</p> <p>Link to Merton’s Planning applications committee 17th July 2020 resolved to approve 19/P4048</p> <p>Link to Merton’s Cabinet decision December 2021 to dispose of sites (agenda item 7)</p>

04 Type B sites – Elm Nursery car park

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Elm Nursery car park					
Local plan ref (if relevant)	Mi4					
Total capacity	21					
Plan period completions	0-5					
Five year completions	21					
	2021/2	2022/3	2023/4	2024/5	2025/6	2026/7
Completions				21		

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

Council owned site; resolved for planning permission for residential (2020) and disposal (2021).

Proposed for site allocation in Merton's new Local Plan as Mi4. Part of four site achieving planning permission in July 2020; approved for disposal by Merton's Cabinet in December 2021.

Council's timeline: planning permission resolved to be granted in July 2020; disposal approved December 2021; disposal to be completed summer 2022; S106 signed late 2022; construction 2023/24 and completions 2024/25

Current planning status and progress towards the submission of an application

Council owned site. Part of four council-owned sites resolved for grant of planning permission on 17th July 2020 by the council's former development company, Merantun Developments Ltd:

- Madeira Road / The Canons (19/P4050)
- Raleigh Gardens car park (19/P4048)

<ul style="list-style-type: none">- Elm Nursery car park (19/P4047)- Farm Road church (19/P4046)
Progress with site assessment work Site assessment work carried out as part of planning application resolved to be granted permission
Site viability Site viability work carried out as part of planning application resolved to be granted permission July 2020
Availability: ownership, any existing uses, etc Council owned. In December 2021 council approved disposal of all four sites
Infrastructure provision Addressed within planning application – no significant dependencies
Relevant information from the HELAA/SHLAA
Other evidence Link to planning application details for Elm Nursery car park (19/P4047) Link to Merton's Planning applications committee 17th July 2020 resolved to approve 19/P4047 Link to Merton's Cabinet decision December 2021 to dispose of sites (agenda item 7)

05 Type B sites – Farm Road church

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Farm Road church					
Local plan ref (if relevant)						
Total capacity	21					
Plan period completions	0-5					
Five year completions	21					
	2021/2	2022/3	2023/4	2024/5	2025/6	2026/7
Completions				21		

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

Council owned site; resolved for planning permission for residential (2020) and disposal (2021).

Part of four site achieving planning permission in July 2020; approved for disposal by Merton's Cabinet in December 2021.

Council's timeline: planning permission resolved to be granted in July 2020; disposal approved December 2021; disposal to be completed summer 2022; S106 signed late 2022; construction 2023/24 and completions 2024/25

Current planning status and progress towards the submission of an application

Council owned site. Part of four council-owned sites resolved for grant of planning permission on 17th July 2020 by the council's former development company, Merantun Developments Ltd:

- Madeira Road / The Canons (19/P4050)
- Raleigh Gardens car park (19/P4048)
- Elm Nursery car park (19/P4047)

- Farm Road church (19/P4046)
Progress with site assessment work Site assessment work carried out as part of planning application resolved to be granted permission
Site viability Site viability work carried out as part of planning application resolved to be granted permission July 2020
Availability: ownership, any existing uses, etc Council owned. In December 2021 council approved disposal of all four sites
Infrastructure provision Addressed within planning application – no significant dependencies
Relevant information from the HELAA/SHLAA
Other evidence Link to planning application details for Farm Road church (19/P4046) Link to Merton's Planning applications committee 17th July 2020 resolved to approve 19/P4046 Link to Merton's Cabinet decision December 2021 to dispose of sites (agenda item 7)

06 Type B site- Benedict's Wharf

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Benedict's Wharf				
Local plan ref (if relevant)	Mi1				
Total capacity	850 homes				
Plan period completions	0-5 and 5-10 years (2025-2028)				
Five year completions	430				
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				215	215

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates Landowner SUEZ UK has subject to planning arrangement with established housebuilder. Planning permission due to be issued March 2022.</p> <p>Site proposed for allocation in the new Local Plan. Site proposed to be removed from waste management designation in the South London Waste Plan 2022. Pre-application discussions with residents etc started 2018; planning application submitted 2019</p> <p>Site will have outline planning permission for 850 homes subject to GLA issuing Decision Notice in early March 2022 (confirmed via liaison with the GLA)</p> <p>Site owner is SUEZ UK Ltd who are in the process of selling the site and have long confirmed that they will not be developing it (as not a housebuilder). Engagement with SUEZ UK clarifies significant housebuilder interest in the site and have a subject to planning deal with an established housebuilder. (This is also confirmed within the GLA's committee report dated December 2020)</p> <p>SUEZ UK are moving their waste operations to a site they own and which has planning permission in the nearby London Borough of Sutton; but until recently was used as a Covid19 testing centre.</p>

Outline development permission proposes multiple buildings and is likely to be built in phases. Start on site estimated 2023. Build out timescales similar to Wimbledon Stadium (634 homes in 2.5 years)

Current planning status and progress towards the submission of an application

Following pre-application engagement and engagement on local plan allocation; landowners SUEZ UK submitted an outline planning application in 2019 (ref 19/P2323) which was increased to up to 850 homes during the course of the planning application. In July 2020 Merton Council's Planning Committee resolved to refuse the application; it was called in by the Mayor of London; the GLA held a public hearing and resolved to grant permission in December 2020.

The Section 106 has been drafted and agreed by all parties. Awaiting GLA Decision Notice, due to be issued in the first two weeks of March 2022 (according to GLA email 11th February 2022).

Progress with site assessment work

As set out in Outline Planning Application 19/P2383 which is resolved to be granted with Section 106 agreed.

Site viability

As set out in Outline Planning Application 19/P2383 which was resolved to be granted based in part on viability evidence.

Availability: ownership, any existing uses, etc

Site owner is SUEZ UK Ltd who are in the process of selling the site and have long confirmed that they will not be developing it (as not a housebuilder).

SUEZ UK are moving their existing waste management operations to a site they own in the nearby London Borough of Sutton. Up until 2022 this site was used as a Covid19 testing centre by the NHS temporarily since 2020. Waste management matters have been considered by both the South London Waste Plan 2022 (which proposes to remove the site allocation for waste management) and via the planning application.

SUEZ UK have confirmed they had significant interest in the site from established housebuilders and have a subject to planning arrangement with an established housebuilder and registered provider to deliver the site.

Start on site estimated 2023.

Infrastructure provision

As detailed in the site allocation Mi1. Infrastructure provision has also been considered in the outline planning decision.

Relevant information from the HELAA/SHLAA

Other evidence

Link to planning records for Outline Planning Application 19/P2382

<https://planning.merton.gov.uk/Northgate/PlanningExplorerAA/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=1000107184&XSLT=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/Menu/PL.xml&DAURI=PLANNING>

Link to GLA website on December 2020 public hearing

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/land-benedict-wharf-public-hearing>

Link to GLA committee report pre hearing – December 2020

https://www.london.gov.uk/sites/default/files/gla_4756_benedict_wharf_stage_3_report_30.11.2020.pdf

07 Type B sites – Eastfields estate regeneration

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Eastfields Estate regeneration				
Local plan ref (if relevant)	None for this emerging local plan (but allocated in adopted Merton Estates Local Plan 2018)				
Total capacity	833 in multiple phases				
Plan period completions	0-15				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					99

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

Clarion Housing Group is the Developer as part of the estate regeneration of Eastfields, High Path and Ravensbury estates in Merton.

Clarion are redeveloping three estates in Merton that they are the majority owners of, supported by the council. Outline permission granted for whole of Eastfields estate in April 2019; Eastfields Phase 1 reserved matters submitted January 2022.

Council has adopted Estates Local Plan in February 2018 to support the regeneration of all three estates. Council also:

- resolved CPO in principle (2018);
- waived elements of Merton's Stock Transfer Agreement (September 2021) and
- considering details of CPO (scheduled for March 2022).

Delivery programmes part of most recent September 2021 Clarion report and updated for March 2022 Compulsory Purchase Orders (see links below).

Based on information from Clarion Housing Group on the complexities of moving residents to new homes, construction and demolition across phases.

Current planning status and progress towards the submission of an application

- Estates local plan adopted in February 2018, allocating the three estates of Eastfields, High Path and Ravensbury for viability
- Outline planning permission for whole estate granted in April 2019 (17/P1717)

- Clarion undertook Eastfields Phase 1 reserved matters pre application consultation with residents and the council in 2019 and again in 2021
- Clarion submitted Eastfields Phase 1 reserved matters in January 2022 (ref 21/P4430), due for Merton's planning committee in spring 2022

Eastfields will be delivered in circa 4 phases across 15 years

Progress with site assessment work

See link to Merton's adopted Estates Local Plan which is an adopted development plan document which has assessed site capacities. See also link to outline planning permission granted 17/P1717 on site capacities

Site viability

See link below to September 2021 Cabinet Committee report – Clarion are continuing to deliver despite viability challenges and with the support of the council in waiving part of Merton's Stock Transfer Agreement which helps to improve viability. In March 2022 Merton's Cabinet are due to consider a report on compulsory purchase orders which is, in part, dependent on demonstrating site deliverability.

Availability: ownership, any existing uses, etc

The whole of Eastfields estate has 464 existing homes. At the start of the project in 2014 Clarion owned approx 60% of the existing estate. Since 2014 Clarion has been engaging residents (leaseholders, freeholders and their tenants) on the right to remain on the estate once regeneration has completed and buying back owners who wanted to move. Delivery addressed also in Examination in Public of Merton's Estates Local Plan. Council has resolved to support CPO in principle in February 2018. Merton's Cabinet in March 2022 is due to consider compulsory purchase orders for all three estates

Infrastructure provision

Thoroughly considered in adopted Estates Local Plan 2018; outline planning permission April 2019 (ref 17/P1717) and associated S106

Relevant information from the HELAA/SHLAA

Other evidence

- Link to Merton's Estates Local Plan adopted Feb 2018 [Estates Local Plan : Estates Local Plan | Merton Council](#)
- Link to Council report Feb 2018 on delivering Clarion's regeneration [2018-02-07 Council Delivering Clarion Regen vFINAL.pdf \(merton.gov.uk\)](#)
- Link to Outline Planning Permission granted for whole of Eastfields estate April 2019 (ref 17/P1717) <https://planning.merton.gov.uk/Northgate/PlanningExplorerAA/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=1000098156&XSLT=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/Menus/PL.xml&DAURI=PLANNING>

- Link to Eastfields Phase 1 reserved matters submitted January 2022, on track for spring 2022 planning decision (ref 21/P4430) <https://planning.merton.gov.uk/Northgate/PlanningExplorerAA/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=1000117128&XSLT=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/Northgate/PlanningExplorerAA/SiteFiles/Skins/Merton/Menus/PL.xml&DAURI=PLANNING>
- Link to Clarion's website on Eastfields regeneration <https://www.myclarionhousing.com/my-community/regeneration-projects/merton-london/eastfields>
- Link to Merton Council September 2021 report waiving part of the stock transfer agreement to support regeneration [Appx B - Cabinet report 6 Sept21 support for Clarion estate regen inc all appendices.pdf \(merton.gov.uk\)](#)
- Link to Merton's Cabinet, March 2022 – [report recommending Compulsory Purchase Orders for all three estates](#)

08 Type B sites- White hart and car repairs, Kingston Road

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	White Hart and car repairs, Kingston Road					
Local plan ref (if relevant)						
Total capacity	56					
Plan period completions	0-5 years					
Five year completions						
	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Completions		56				

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>The planning applicant has entered into an agreement with the site owner (The Rutlish Foundation) to deliver the site. Pre application discussions undertaken since 2017; application submitted 2021; most issues resolved towards determination.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Held pre application discussions with the council and public consultation: 2017: http://www.mertonpark.org.uk/the-journey-begins/ And 2020: https://www.whitehartkingstonroad.co.uk/</p> <p>Planning application submitted July 2021 – reference 21/P2565 – for 56 homes and c400sqm commercial on the ground floor.</p> <p>Scheme has been reviewed by Merton’s Design Review Panel three times: 2018, 2020 and most recently in April 2021.</p>
<p>Progress with site assessment work</p>

Carried out as part of assessing planning application 21/P2565. Reviewed by Merton's Design Review Panel three times: 2018, 2020 and most recently in April 2021.

Site viability

Carried out as part of assessing planning application 21/P2565.

Availability: ownership, any existing uses, etc

There is currently a long term vacant former public house; a car repairs business and a parking lot on site. The planning applicant has entered into an agreement with the site owner (The Rutlish Foundation) to deliver the site. Significant planning activity and engagement with the council taking place.

Infrastructure provision

Considered as part of assessing planning application 21/P2565. No significant infrastructure required for delivery.

Relevant information from the HELAA/SHLAA

2017 SHLAA (ref 17240020) assessed capacity for 70 homes, delivered in phases 2 (2019-24 and phase 3 (2024-29)

Other evidence

[Link to planning application documents 21/P2565](#)

08 Type B sites- Brown and Root Phase 2

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Brown and Root Phase 2				
Local plan ref (if relevant)	CW2				
Total capacity	220				
Plan period completions	0-5				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				120	100

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

The Developer is Criterion Capital, agents Quod. Criterion Capital are an established developer and have previously developed the adjacent 19 storey building for residential (mixed use on ground floor).

Following pre application dialogue with council and GLA, developer has submitted a planning application (21/P0082) to Merton Council in January 2021

Viability information that the Developer provided with the planning application states a 2-year construction period. Developer's information provided for Local Plan and planning application indicates that subject to planning permission the site is immediately available for development

For the Local Plan and 5 year supply, site capacity based on two buildings of a height adherence to emerging Local Plan policy (N1 Colliers Wood and Site Allocation CW20 which states that the existing 19 storey tower (containing 218 new homes) adjacent the site being the pinnacle building height in the area.

Current planning status and progress towards the submission of an application

Developer submitted planning application (ref 21/P0042) to Merton Council in January 2021 for 266 homes in two buildings, one of 16 storeys and one of 26 storeys plus c1,100sqm mixed use commercial on the ground floor.

Merton's Design Review Panel reviewed the scheme in June 2020 and again on 25th November 2020 and raised issues of building heights.

Application referable to GLA and GLA have provided a Stage 1 report; development supported but raising issues of building heights.

Planning application issues of building heights, design, viability and other matters still under consideration.

Progress with site assessment work

The council has undertaken site assessment work together with the planning application assessment. The Local Plan site capacity assessment site capacity based on two buildings of a height adherence to emerging Local Plan policy (N1 Colliers Wood and Site Allocation CW20) which states that taller buildings are the existing 19 storey tower being the pinnacle building height

Site viability

The Developer has provided a detailed viability report as part of their planning application which is being considered by Merton Council and the GLA as part of the planning application.

Availability: ownership, any existing uses, etc

Site is cleared, adjacent existing 19 storey residential tower freehold by developer

The cleared site is owned by the Developer and there is no impediment to its availability for residential development (subject to planning permission) as demonstrated in the [Developer's response to Merton's Local Plan Stage 2a](#) (part of Document 0D15) and information in submitted planning application 21/P0082.

Site assessment for the purposes of the Local Plan has

Infrastructure provision:

As identified in site allocation CW2 – specific comments received from infrastructure providers. Infrastructure providers are also commenting on the planning application.

Relevant information from the HELAA/SHLAA

Other evidence

Link to the Developer's planning application 21/P0082 on Merton Council's website

<https://planning.merton.gov.uk/MVM/Online/DMS/DocumentViewer.aspx?pk=1000112962&SearchType=Planning%20Application>

09 Type B sites – Rufus Business Centre, Wimbledon Park

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Rufus business centre				
Local plan ref (if relevant)	Wi7				
Total capacity	96				
Plan period completions	96				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions		46	50		

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

Developer is Wandle Way Ltd. Site Rufus business centre is owned by some of the shareholders that own the adjacent Haslemere estate to the north, recently developed for 129 homes and some commercial space.

Developer has submitted the site for allocation in the local plan as Site Wi7, and submitted a planning application in April 2021, which was considered by and deferred from the February 2022 Planning Applications Committee, due to be considered by March 2022 planning applications committee.

Information provided by the developer to support the planning decision proposes a build out of approximately one year from 2023-2025, subject to planning. The timescale for build out rates also corresponds to the recent construction of 129 homes plus c1,000sqm commercial on the adjacent and directly connected site (Haselmere estate) where full build out of c2 years took place during the Covid19 pandemic.

Current planning status and progress towards the submission of an application

<p>Developer has undertaken pre application engagement since 2020, planning application submitted and validated in April 2021 (21/P1780).</p> <p>Planning application considered by Merton’s Planning Application Committee in February 2022; officers report recommending approval. Decision deferred until March 2022 pending more information.</p>
<p>Progress with site assessment work Site assessment work carried out via planning process; earlier schemes pre application were for different sizes and scales.</p>
<p>Site viability Site viability work carried out through planning application process</p>
<p>Availability: ownership, any existing uses, etc Rufus business centre is owned by some of the shareholders of the adjacent Haslemere estate to the north (2014 site allocation; recently rebuilt to provide +129 homes and some commercial floorspace.)</p>
<p>Infrastructure provision Considered as part of planning application process. Some on-site decontamination and flood risk mitigation required.</p>
<p>Relevant information from the HELAA/SHLAA</p>
<p>Other evidence Link to planning application documents for 21/P1780 Link to officer’s report to Merton’s Planning Applications Committee February 2022 (recommended approval – decision deferred)</p>

12 Type B sites – Majestic Way

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Majestic Way				
Local plan ref (if relevant)	Mi8				
Total capacity	39				
Plan period completions	0-5 years				
Five year completions	160				
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				80	80

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Developer is Centrica Combined Common Investment Fund; planning agents DP9. Undertaking pre application discussions with the council since 2020; planning application submission due mid 2022.</p> <p>Subject to planning permission; build out predicated on vacant possession 2023/24; demolition and construction 2024-2027. Site size means options for phasing scheme.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Pre-application discussions started early 2020; further pre application dialogue in 2021 and into 2022. Planning application expected spring 2022.</p>
<p>Progress with site assessment work</p> <p>Being progressed as part of significant pre application dialogue since 2020 and will be delivered through planning application.</p>

Site viability

Being progressed as part of pre application dialogue and will be delivered through planning application

Availability: ownership, any existing uses, etc

Owned by developer (Centrica Combined Common Investment Fund). Commercial leases on ground floor.

Infrastructure provision

As identified in proposed site allocation. Site includes multi storey car park, currently leased by Merton Council. Application will provide a car parking assessment to demonstrate demand for car parking spaces in the area.

Relevant information from the HELAA/SHLAA

In 2017 SHLAA ref 17240202 - 30 homes - 3 in P2, 6 in P3, 9 in P4 and 12 in P5.

Other evidence

12 Type B sites – Wilson Hospital

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Wilson Hospital				
Local plan ref (if relevant)	Mi18 (and in the adopted 2014 Sites and Policies Plan as Site Proposal 20)				
Total capacity	39				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					39

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>NHS Property Services own the site. Exploring site for Mitcham Health and Wellbeing Hub plus residential on surplus parts of site. Pre application discussions took place with council in 2021. Previous lapsed planning permission on same site for 11 homes.</p> <p>Long term project. Health and care plans commenced pre pandemic but put on hold for one year. Pre application dialogue with council in 2021.</p> <p>Above timescale predicated on achieving planning permission of this site and any NHS sites required to fund this development by 2024; development of health and wellbeing hub first, followed by new homes by 2026/27.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Very long term project. Site allocated in 2014 local plan as Site Proposal 20; Pre application discussions most recently since</p>
<p>Progress with site assessment work</p>

Planning permission 04/P0355 (granted 2004; lapsed) demonstrates that 11 homes could be delivered along Caesar's Walk (completing the existing form of terraced housing there). Developer (NHS) considers capacity for further 28 homes within remaining Wilson hospital site while accommodating the new Mitcham Health and Wellbeing Hub.

Pre application discussions have taken place with council, most recently in 2021

Site viability

NHS funding mechanisms for health and wellbeing hub now allow for capital receipts from other sites (e.g. Birches Close, site allocation Mi2 or the residential development on the Wilson) to be recycled to help fund the Mitcham health and wellbeing hub.

Site viability for residential will be taken forward through the planning application.

Availability: ownership, any existing uses, etc

Owned by NHS Property Services. Longstanding discussions on delivery in conjunction with other NHS Property Services sites allocated in Merton's 2014 local plan or proposed for allocation in this Local Plan. Parts of Wilson site are in existing clinical and wellbeing use. Proposed for site to be mainly Mitcham Health and Wellbeing Hub with some residential (see Submitted Document 14D6 Merton Health and Care Estates Strategy).

Infrastructure provision

As above – site to mainly provide health and wellbeing hub with some capacity for residential on parts not required for the Hub.

Relevant information from the HELAA/SHLAA

Other evidence

[Link to 04/P0355](#) - planning permission granted 2004 for 11 homes on part of site facing Caesar's Walk (lapsed)

[Submitted Document 14D6 Merton Health and Care Estates Strategy](#) – NHS Clinical Commissioning Group

[South West London Clinical Commissioning Group website](#) on Mitcham Health and Wellbeing Hub

Submitted Document 14



13 Type B sites- Tooting Police Station, Ascot Road

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Tooting Police Station, Ascot Road				
Local plan ref (if relevant)	N/A				
Total capacity	60				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions		60			

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Developer / landowner is Telereal Trillium; planning agents are Turley</p> <p>Pre application proposals mainly for the conversion of the existing empty building to residential, with some extensions proposed to provide more new homes.</p> <p>Application due for submission early 2022 with construction to start mid 2022 (subject to planning); according to Telereal Trillium's consultation website.</p> <p>Pre application consultation has been for approximately 69 homes. 60 homes has been assumed in housing trajectory pending planning decision to take account of any requirement for larger homes within converted building or any potential amendments that may arise on building extensions.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Pre application discussions taking place since 2021 with new owners</p> <p>Merton's Design Review Panel considered a scheme in July 2021 and again in November 2021.</p>

Public consultation took place for a scheme of 68 homes in late 2021, online and with drop in events (see link below)

Planning application due early 2022

Progress with site assessment work

Being carried out through the pre application process.

The Developer's pre-application site proposals were considered by Merton's Design Review Panel in July 2021 and again in November 2021

The site has been on Merton's local list of historic buildings since the 1990s and was listed by Historic England (Grade II) in May 2021

Pre application consultation has been for approximately 69 homes. 60 homes has been assumed in housing trajectory pending planning decision to take account of any requirement for larger homes within converted building or any potential amendments that may arise on building extensions during the planning application process.

Site viability

Being carried out through the planning application process.

Availability: ownership, any existing uses, etc

Site vacant. Tooting Police Station – the police / office functions were closed in 2020; the site was identified for disposal by the Met Police estate's strategy and was marketed through the GLA's small sites small builders programme. <https://www.london.gov.uk/what-we-do/housing-and-land/land-and-development/small-sites/former-tooting-police-station>

Telereal Trillium announced their purchase of the site in early 2021

Infrastructure provision

Being carried out through the planning application process. As the Met Police had identified this station as surplus to requirements there is no requirement to reprovide infrastructure relating to police activity.

Relevant information from the HELAA/SHLAA

82 homes in GLA SHLAA 2017 split 41 in P4 and 41 in P5.

Other evidence

[Merton Design Review Panel agenda for Tooting Police Station – November 2021](#) (referencing July 2021)

[Landowner Telereal Trillium's public consultation website \(November / December 2021\)](#)

16 Type B sites – Mitcham Gasworks

B. Other sites (including those of at least 10 homes or at least 0.5ha with outline permission, with a grant or permission in principle, allocations, or identified on brownfield register)

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Mitcham Gasworks					
Local plan ref (if relevant)	Mi16 (and allocated as Site Proposal 75 in Merton’s adopted Local Plan (Sites and Policies Plan 2014)					
Total capacity	450					
Plan period completions	0-5 years					
Five year completions	450					
	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Completions			225	225		

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates:
 Developer / landowner is St William – JV between Berkeley Homes and National Grid.

Developer has brought forward planning proposals (pre application) for circa 650 homes. Developer intentions to start construction as soon as possible on receipt of planning permission (as demonstrated in significant pre app discussions and link to consultation documents below).

Currently on site undertaking decontamination works. Gasholder was demolished by January 2022 and the site is vacant.

Developers have confirmed to council officers that delivery will be 2024 to 2026 (multi building development across 2ha) This also is a delivery build out timescales based on similar projects in Merton of this size and scale. Site decontamination will be required as part of planning permission.

There is a difference between the number of homes proposed in the Local Plan by the council (450 homes) and the numbers being considered by the Developer during the pre-application process (circa 650 homes)

Current planning status and progress towards the submission of an application

Significant pre application discussions with Merton Council.

In 2020 landowner applied to decommission the gasholder and engaged with council on early pre app discussions. The site is allocated in Merton's Sites and Policies Plan 2014 and the council has had ongoing engagement with the developer over time. Detailed pre-application discussions on specific scheme layouts started in 2021 and has continued into 2022. The GLA have also been involved in pre application engagement with the developer and the council (this is a referable scheme due to the number of homes)

Prior approval for gasholder decommissioning was given in March 2021 (20/P0703) and gasholder was removed by January 2022

Merton's Design Review Panel considered the site proposals in November 2021.

The Developer started public engagement in 2021, continued into 2022 (see links to engagement website below)

The Developer has informed the council to expect a planning application submission c June 2022.

Progress with site assessment work

Developer pre application proposals based on circa 650 homes on this cleared site, with buildings ranging between 5-8 storeys with some blocks proposed up to 13 storeys.

Council indicative capacity for Local Plan purposes is up to 450 homes; taking local site character into account. Surrounding properties are 2-5 storeys.

Design considerations mean Merton's Local Plan site allocation of up to 450 homes is different from the Developer's pre application proposals for "circa 650 homes".

Site assessment dialogue is continuing with the developer, the council and the GLA.

Site viability

Site viability will need to take account of site decontamination abnormals and usual development costs in planning application viability. Decontamination is currently taking place and gasholder demolished.

Availability: ownership, any existing uses, etc

Site is vacant, available and cleared. Existing Gasholder demolished in January 2022. Owned by National Grid. Being developed by St William (joint venture between National Grid and Berkeley Homes). Part of site developed for housing in late 2000s by Barrett Homes. Site allocated in 2014 local plan.

Infrastructure provision

As identified in site allocation Mi16 – specific comments from infrastructure providers.

Developer's pre application consultation has identified some non residential floorspace on site, which is supported..

Relevant information from the HELAA/SHLAA

In 2017 SHLAA - ref 17240202. For 30 homes - 3 in P2, 6 in P3, 9 in P4 and 12 in P5.

Other evidence

See link to 2014 adopted Local Plan where allocation is Site Proposal 75

https://www.merton.gov.uk/system/files?file=merton_sites_and_policies_mitcham_sites_only_jul14-2.pdf

See link to Merton Council Design Review Panel agenda 24th November 2021

<https://democracy.merton.gov.uk/documents/s44360/DRP%20Agenda%20-%202021%20-%2010%20-%2024%20Nov%20-%20Public.pdf>

See link to Developer's website set up in late 2021 prior to January 2022 consultation event

<https://mitchamgasworks.com/>

and direct link to Developer's January 2022 consultation display boards https://mitchamgasworks.com/wp-content/uploads/2022/01/MitchamGasworks_Jan_Consultation_web.pdf

15 Birches Close Mitcham

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Birches Close, Mitcham				
Local plan ref (if relevant)	Mi2				
Total capacity	38				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions			38		

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates Landowner NHS Property Services.</p> <p>Allocated in Merton’s 2014 Sites and Policies Plan and in this local plan. Receipts from Birches Close to be recycled to fund the Mitcham Health and Wellbeing Hub</p> <p>Pre application discussions June 2021.</p> <p>Estimate 1 year / 18 month build out from start on site.</p>
<p>Current planning status and progress towards the submission of an application Allocated in Merton’s 2014 Sites and Policies Plan and in this local plan as site Mi2 Receipts from Birches Close to be recycled to fund the Mitcham Health and Wellbeing Hub at the Wilson Hospital (site Mi16) Pre application discussions</p>

<p>Progress with site assessment work Carried out through pre application discussions with NHS Property Services.</p>
<p>Site viability Through the planning application process.</p>
<p>Availability: ownership, any existing uses, etc Owned by NHS Property Services. Allocated for residential uses in Merton's 2014 Sites and Policies Plan and this local plan. Earmarked for disposal in Merton's Health and Care Estates Strategy (Submitted Document 0D16).</p>
<p>Infrastructure provision Owned by NHS Property Services. Earmarked for disposal in Merton's Health and Care Estates Strategy (Submitted Document 0D16) Receipts from Birches Close to be recycled to fund the Mitcham Health and Wellbeing Hub at the Wilson Hospital (site Mi16)</p>
<p>Relevant information from the HELAA/SHLAA</p>
<p>Other evidence</p> <p>Submitted Document 14D6 Merton Health and Care Estates Strategy – NHS Clinical Commissioning Group</p> <p>South West London Clinical Commissioning Group website on Mitcham Health and Wellbeing Hub Submitted Document 14</p>

16 Type B sites - Wimbledon Chase Station

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Wimbledon Chase station				
Local plan ref (if relevant)					
Total capacity	62				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					62

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Longer build out times from 2022 planning application due to ongoing considerations of the development funding step free access and the sensitivities of constructing so close to an operational train station.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Pre application discussions started in 2019 for 62 homes.</p> <p>Developer undertook public consultation December 2019</p> <p>Merton’s Design Review Panel considered a scheme March 2020</p> <p>Latest pre application discussions winter 2021</p> <p>Application expected 2022</p> <p>Progress with site assessment work</p>

As per pre application discussions, including Merton's Design Review Panel review.

Site viability

Being taken through the planning applications process

Availability: ownership, any existing uses, etc

Part owned by Network Rail.

Infrastructure provision

Public consultation feedback is for the scheme to support step-free access to Wimbledon Chase station.

Relevant information from the HELAA/SHLAA

Other evidence

17 Type B sites - LESSA Grand Drive

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	LESSA, Grand Drive				
Local plan ref (if relevant)	RP6 21/P4063				
Total capacity	107				
Plan period completions	107				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					107

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Bellway Homes is landowner and developer. Has proposed site for allocation and submitted first planning application in 2020. Planning application is for 107 homes plus tennis facilities to be delivered for the adjacent Raynes Park tennis club as part of the requirement for sporting uses.</p> <p>Planning application 21/P4063 scheduled for March 2022 planning applications committee.</p> <p>Long build out time due to need to deliver sporting infrastructure as part of scheme alongside new homes.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Proposed site allocation RP6 for <i>“Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered”</i></p> <p>Pre application discussions undertaken from February 2020 onwards.</p>

Planning application submitted October 2020 for 89 homes (20/P3237) and scheme revised to 107 homes (21/P4063) to increase housing capacity on site.

Planning application scheduled for Merton's Planning Applications Committee March 2022.

Progress with site assessment work

As set out in successive planning applications, most recently 21/P4063. Developer and neighbouring tennis club worked together on tennis requirements.

Site viability

Explored through the planning application process for 21/P4063

Availability: ownership, any existing uses, etc

Site long term owned by Bellway Homes. Site vacant and fenced off. Last used as playing fields more than 15 years ago. Referred to in Merton's Playing Pitch Strategy

Infrastructure provision

Land last used as playing field more than 15 years ago. Site considered by council, Sport England and sports National Governing Bodies in creating and adopting Merton's Playing Pitch Strategy 2019 (Submitted Document 14D5). See Recommendation G1 which states

Recommendation G1: The council's draft Local Plan Site Allocations include the following former playing fields: • Site Mi14 - United Westminster Schools Sport Ground (Tamworth Lane Mitcham CR4 1DH) and - Site RP6 - Land at the former LESSA Sports Ground (Grand Drive, Raynes Park SW20 9EB). This PPS indicates that these sites should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough

Relevant information from the HELAA/SHLAA

Other evidence

[Submitted Document 14D5 Merton's Playing Pitch Strategy](#)

[First planning application 20/P3237](#) (89 homes)

[Second planning application 21/P4063](#) (107 homes)

18 Type B sites – Baltic Close

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Baltic Close, Colliers Wood				
Local plan ref (if relevant)	21/P4063				
Total capacity	107				
Plan period completions	2				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions		2			

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates Site owned by Transport for London (Commercial Development). Site cleared and fenced off.</p> <p>Site allocated for residential development</p> <p>Site marketed as part of GLA’s small sites, small builders programme</p> <p>Site development assumes planning application and building contractors assembled in Year 1, build out in Year 2</p>
<p>Current planning status and progress towards the submission of an application Site allocated for residential development, cleared and fenced off.</p>
<p>Progress with site assessment work Small site, considered via the GLA’s Small Sites Small Builders Programme</p>
<p>Site viability To be considered via the planning application process.</p>

Availability: ownership, any existing uses, etc

Site marketed as part of the GLA's small sites, small builders programme

Infrastructure provision

Potential for cycle parking station as meanwhile use while planning secured.

Relevant information from the HELAA/SHLAA

Other evidence

2 Type B sites – Colliers Wood Community Centre

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Colliers Wood Community Centre				
Local plan ref (if relevant)	CW3				
Total capacity	10				
Plan period completions	10				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					10

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Owned by Merton Council. Allocated for community provision and residential development</p> <p>Delivery programme assumes council disposal / developer secured 2023/24; planning application and decision 2024/25 and 2 year build out. Longer build period of 2 years due to re-provision of community space as well as homes.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Allocated in the emerging local plan as CW2 for “mixed use community and residential” and in Merton’s 2014 Sites and Policies Plan for the same.</p>
<p>Progress with site assessment work</p> <p>Initial site assessment work demonstrates capacity for community space and homes; at the time of application development proposals will have to have regard to Merton’s infrastructure delivery plan.</p>
<p>Site viability</p> <p>To be considered at the time of planning application</p>

Availability: ownership, any existing uses, etc

Council owned. Used as a community centre. Allocated in Merton's Sites and Policies Plan 2014 and this proposed local plan for mixed use community and residential

Infrastructure provision

As set out in the site allocation

Relevant information from the HELAA/SHLAA

Other evidence

20 Type B sites – Taylor Road Day Centre

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Taylor Road Day Centre				
Local plan ref (if relevant)	Mi15				
Total capacity	5				
Plan period completions	5				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				5	

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Site owned by council and used for community services on short lease.</p> <p>Completion assumes council disposal / developer interest 2023/24; planning application and decision 2024; build out by 2025/26</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Site proposed for allocation as mixed use community and residential or solely residential use if the community use is provided elsewhere.</p> <p>No pre application dialogue proposed in 2022</p>
<p>Progress with site assessment work</p> <p>Initial site assessment work demonstrates capacity for 5 homes</p>
<p>Site viability</p> <p>To be assessed pre application</p>

Availability: ownership, any existing uses, etc

Centre on short lease for community purposes

Infrastructure provision

The needs for community services on site or elsewhere would need to be assessed pre application

Relevant information from the HELAA/SHLAA

Other evidence

21 Type B sites Worsfold House, Mitcham

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Worsfold House				
Local plan ref (if relevant)	Mi19 and 2014 local plan				
Total capacity	60				
Plan period completions	60				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions			60		

Clear evidence relating to:

Developer delivery intentions including anticipated start and build out rates

Council owned site. Vacant or short term uses.

Allocated in the 2014 Sites and Policies Plan and this local plan for residential development.

Disposal agreed at Merton's Property Asset Management Board July 2020 following completion of construction at Melrose School on adjacent site.

Cabinet resolved to dispose of site in December 2021

Disposal to be completed summer 2022. In active discussions with interested parties for housebuilding.

Delivery programme assumes planning 2022 / 23 with 18 month / 2 year build out.

Current planning status and progress towards the submission of an application

Site allocated for residential development in 2014 Sites and Policies Plan and this local plan. Active discussions with interested parties for housebuilding.

Progress with site assessment work

Council has undertaken site assessment work including for original site capacity prior to a disposal proposal in 2019; including as part of Merton's One Public Estate programme which assessed site capacity and viability.

Site viability

Initially assessed alongside site capacity as part of Merton's One Public Estate Programme. Informed council disposal

Availability: ownership, any existing uses, etc

Council owned. Site has been vacant or on short lease occupancy since declared surplus to requirements in 2019. Disposal agreed at Merton's Property Asset Management Board July 2020 following completion of construction at Melrose School on adjacent site. Cabinet resolved to dispose of site for residential uses in December 2021

Infrastructure provision

As identified in proposed site allocation

Relevant information from the HELAA/SHLAA

Other evidence

[Merton Cabinet resolved surplus to requirements - July 2019](#)

[Merton's Cabinet resolved site disposal – December 2021](#)

23 Type B sites - 326 and 328 London Road

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	326 and 328 London Road, Mitcham				
Local plan ref (if relevant)	Mi7				
Total capacity	11				
Plan period completions	11				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					11

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Council owned.</p> <p>Considered as part of Merton's GLA-funded Small Sites Review. Capacity based on Merton's One Public Estate capacity and viability work.</p> <p>Disposal is subject to the relocation of current services in the building (Merton's Citizens Advice Bureau now occupies 326 London Road).</p> <p>Delivery assumptions based on disposal including relocation of existing services concluded by 2024/25; planning approval 2025; build out 18 months by 2027.</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Proposed for allocation in this local plan.</p>

Progress with site assessment work

Site capacity and development viability initially assessed as part of Merton's One Public Estate Programme in February 2019. Subsequently considered as part of Merton's GLA funded small sites review in 2021

Site viability

Valuation carried out as part of Merton's One Public Estate Programme February 2019. Viability would be assessed at the time of a planning application

Availability: ownership, any existing uses, etc

Council owned. Existing use includes Merton's Citizen's Advice Bureau which moved into the building in 2017. Disposal is subject to the relocation of current services in the building.

Infrastructure provision

As set out in the site allocation. Would require successful relocation of Merton's Citizens Advice Bureau

Relevant information from the HELAA/SHLAA**Other evidence**

23 Type B sites - Chaucer Centre

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Chaucer Centre				
Local plan ref (if relevant)	Mo1				
Total capacity	60				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				60	

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Council owned and occupied by council staff for training and meetings.</p> <p>Allocated in 2014 Sites and Policies Plan and this local plan for residential</p> <p>Council resolved to dispose of site in December 2021. Disposal due to be complete summer 2022.</p> <p>Delivery programme assumes planning application submitted 2022/23; determined 2023; construction based on conversion and extension of existing building: 2024-2026</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Site allocated in 2014 and this local plan.</p>
<p>Progress with site assessment work</p>

Initial viability and capacity work carried out as part of considering site for disposal. Capacity of 60 homes based on conversion and extension of existing building.
Site viability
Initial viability and capacity work carried out as part of considering site for disposal.
Availability: ownership, any existing uses, etc
Council owned; used for staff training and meetings. Allocated in Merton's Sites and Policies Plan 2014 and in this local plan for residential development. Identified as surplus to requirements and resolved for disposal in December 2021
Infrastructure provision
As identified in site allocation – no significant or unusual requirements
Relevant information from the HELAA/SHLAA
In SHLAA 2017 for 61 homes in P3
Other evidence
Merton's Cabinet – resolution to dispose of site December 2021

24 Type B sites - Gifford House

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Gifford House				
Local plan ref (if relevant)	Mo7				
Total capacity	24				
Plan period completions	24				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				24	

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Council owned. Site rented as offices to the South London Legal Partnership. Other council property assets available as part of post Covid19 operational property asset review</p> <p>Site identified as surplus to requirements and resolved for disposal in December 2021</p> <p>Delivery programme assumes disposal complete as planned summer 2022; planning application submitted 2022/23; determined 2023/24; construction based on conversion and extension of existing building: 2024-2026</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Site allocated in 2014 and this local plan.</p>
<p>Progress with site assessment work</p>

<p>Initial viability and capacity work carried out as part of considering site for disposal. Capacity of 24 homes based on conversion and extension of existing building.</p>
<p>Site viability Initial viability and capacity work carried out as part of considering site for disposal.</p>
<p>Availability: ownership, any existing uses, etc Council owned; rented as offices to the South London Legal Partnership. Identified as surplus to requirements and resolved for disposal in December 2021</p>
<p>Infrastructure provision As identified in site allocation – no significant or unusual requirements</p>
<p>Relevant information from the HELAA/SHLAA</p>
<p>Other evidence Merton's Cabinet – resolution to dispose of site December 2021</p>

25 Type B sites - Battle Close

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Battle Close				
Local plan ref (if relevant)	Wi1				
Total capacity	105				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				50	55

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Council owned. Cleared and vacant site.</p> <p>Cabinet resolved to dispose of site in December 2021</p> <p>Disposal due to complete summer 2022; planning application submissions 2022/23; decision 2023; start on site 2024 (no demolition required); completed by 2027</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Allocated for residential in this local plan. Resolved for disposal and housebuilders aware of council intentions.</p>
<p>Progress with site assessment work</p> <p>Site capacity work undertaken by council and as part of GLA small sites work</p>

Site viability

Site capacity work undertaken by council and as part of GLA small sites work. Detailed viability will be confirmed at planning application

Availability: ownership, any existing uses, etc

Council owned. Former Virgin Active gym and swimming pool; Virgin Active disposed of leasehold back to council in 2019 as surplus asset.

Infrastructure provision

Considered as part of Merton's Playing Pitch Strategy 2019 as Virgin Active disposing of lease as a surplus asset. New gym and swimming pool since constructed and opened in Morden

Relevant information from the HELAA/SHLAA**Other evidence**

[Merton's Playing Pitch Strategy 2019 \(Submitted Document 14D5\)](#)

[Merton's Cabinet – resolution to dispose of site December 2021](#)

26 Type B sites - Hoo Hing Elbrook Chak89

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Hoo Hing Elbrook Chak89				
Local plan ref (if relevant)					
Total capacity	105				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				50	55

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Owned by Hoo Hing Ltd and Elbrook Cash and Carry Ltd. Barton Wilmore is planning agent</p> <p>Landowners responded to Local Plan in February and September 2021 (Stge 2a / second Reg 18 and Stage 3 / Reg19 respectively) seeking site redevelopment for residential.</p> <p>Although site proposals submitted too late in Local Plan process for site allocation, council has encouraged landowners to come in for pre application discussions and deliver site through planning application process.</p> <p>The landowners' representations state that the site is available and deliverable within the first five years. The above delivery timescale assumes pre application discussions in 2022; planning application late 2022; temporary or permanent relocation of businesses 2023 and planning decision 2023 with site clearance and built out 2/3 years.</p> <p>Current planning status and progress towards the submission of an application</p> <p>Landowners responded to Local Plan in February and September 2021 (Stge 2a / second Reg 18 and Stage 3 / Reg19 respectively) seeking site redevelopment for residential.</p>
--

Although site proposals submitted too late in Local Plan process for site allocation, council has encouraged landowners to come in for pre application discussions and deliver site through planning application process.

The landowners' representations state that the site is available and deliverable within the first five years. The above delivery timescale assumes pre application discussions in 2022; planning application late 2022; temporary or permanent relocation of businesses 2023 and planning decision 2023 with site clearance and built out 2/3 years.

Progress with site assessment work

Landowners' representatives have not provided a site capacity assessment in either of their representations to the council. Site capacity therefore based on SHLAA 2017 capacity for this site.

Site viability

Viability to be assessed as part of planning application; site capacity also required.

Availability: ownership, any existing uses, etc

The landowner's representative describes the site as available and deliverable, in two land ownerships and could contribute to housing supply during the first five years of the local plan. (see Regulation 19 / Stage 32 representation linked below)

Occupying the site are Hoo Hing supermarket specialising in south east Asian foodstuffs; Chak89 banqueting hall and Elbrook Cash and Carry. The potential loss of the business / community space would have to be addressed; it may be that the proposal would reprovide space as part of a mixed use scheme.

Infrastructure provision

The potential loss of the business / community space would have to be addressed; it may be that the proposal would reprovide space as part of a mixed use scheme.

Relevant information from the HELAA/SHLAA

In the SHLAA 2017 for 105 homes

Other evidence

[Landowner's representation to Stage 3 / Regulation 19](#) (part of Submitted Document 0D6 and 0D7)

27 Type B sites - Morden Road Peugeot Garage

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Morden Road, Peugeot garage				
Local plan ref (if relevant)					
Total capacity	9				
Plan period completions	0-5				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions				9	

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates Site sold in 2021 to Attic Developments.</p> <p>Developer has undertaken pre application engagement with the council and publicly for a mixed use development of self storage and nine homes.</p> <p>Planning application due shortly (early 2022); determination late 2022. Site clearance and build by 2025/26. Long build in time to address any site clearance, contamination issues (site used as car showrooms) or other matters)</p>
<p>Current planning status and progress towards the submission of an application Pre application discussions with owners in 2021 – proposing mixed use self storage and 9 homes</p>
<p>Progress with site assessment work Carried out by the developer and consulted on as part of pre-application consultation</p>
<p>Site viability</p>

Will be carried out by the new landowner / developer as part of the planning application process. Proposing a mixed use scheme of self storage and 9 homes

Availability: ownership, any existing uses, etc

Site recently sold to landowner / developer. Former Peugeot car showrooms and garage, now closed.

Infrastructure provision

To be considered as part of planning application

Relevant information from the HELAA/SHLAA

In 2017 SHLAA for 100 homes assuming whole site developed. New landowner proposing mixed use scheme with self storage and nine homes

Other evidence

[Public consultation on proposed development – developer website](#)

28 Type B sites - Caxton Road depot and workshop

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Caxton Road depot and workshop				
Local plan ref (if relevant)					
Total capacity	43				
Plan period completions	0-5 years				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions					43

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Owned by Met Police. Long term use discussed as part of One Public Estate programme.</p> <p>Delivery assumes disposal of site in 2023/4; planning in 2024/25 and delivery by 206/27 (conservative timescales; for comparison, tooting police station was sold in March 2021 and was in pre application dialogue six months later)</p>
<p>Current planning status and progress towards the submission of an application</p> <p>None at present</p>
<p>Progress with site assessment work</p> <p>Considered as part of the 2017 SHLAA and One Public Estate Programme</p>
<p>Site viability</p>

To be considered as part of planning application process

Availability: ownership, any existing uses, etc

Discussed as part of One Public Estate Programme. Met Police should confirm whether surplus to requirements

Infrastructure provision

To be considered as part of the planning application process; subject to Met Police declaring site surplus to operational requirements

Relevant information from the HELAA/SHLAA

In 2017 SHLAA for 43 homes

Other evidence

29 Type B sites - Land at Waterfall Cottages

These sites can only be considered deliverable where there is clear evidence that housing completions will begin on site within five years

Site name	Land at Waterfall Cottages				
Local plan ref (if relevant)					
Total capacity	6				
Plan period completions	0-5				
Five year completions					
	2022/23	2023/24	2024/25	2025/26	2026/27
Completions			6		

Clear evidence relating to:

<p>Developer delivery intentions including anticipated start and build out rates</p> <p>Council owned.</p> <p>Cabinet resolved to dispose of site in December 2021</p> <p>Timescales assume disposals complete summer 2022; pre application and application submitted late 2022; decision 2023 and completions by 2024/25</p>
<p>Current planning status and progress towards the submission of an application</p> <p>Council owned site for disposal. Potential for site assembly as adjoining non-residential sites have already achieved planning permission for residential (lapsing in 2020)</p>
<p>Progress with site assessment work</p> <p>6 homes derived from work for Council site capacity and viability towards disposal.</p>

Site viability Would be considered as part of planning application process. Initial work undertaken by council on site capacity and viability
Availability: ownership, any existing uses, etc Council owned. Cabinet resolution for disposal December 2021
Infrastructure provision Would be considered as part of planning application process.
Relevant information from the HELAA/SHLAA In SHLAA 2017 combined with neighbouring sites / land ownerships for a total of 35 homes
Other evidence Merton's Cabinet – resolution to dispose of site December 2021

Response to Inspectors' Preliminary Matters for Merton Council dated 28th January 2022

Inspectors' letter:

54 (o) Aspects relating to monitoring of the plan (see paragraphs 43 to 44)

43 As submitted, aside from references to the Annual Monitoring Report (for example, at paragraphs 1.1.20 and 11.2.9), it is unclear what monitoring arrangements will be in place for the Local Plan. Amongst other things, monitoring would be used to gauge the effectiveness of policies and would also help to inform the review process required by Regulation 10A of the 2012 Regulations and outlined further in the Framework (at paragraph 33), and is thus integral to the overall soundness of the Local Plan.

44 It, therefore, follows that changes should be made to the Local Plan to ensure effective monitoring, and we would welcome your suggestions as to how this could be achieved. Any suggested MM should include relevant and measurable indicators, alongside actions that might be necessary as a result of under-performance against these. Your response should also include the wording of any specific monitoring policy that might be needed to ensure effectiveness in these terms.

Merton Council response

- 15.1. Page 24 and Figure 10 of [Document 0D3 Sustainability appraisal of Merton's Local Plan](#) contains the Local Plan monitoring indicators. This has evolved through the creation of the Local Plan and has been subject to public consultation, for example as part of [Document 0D16 Consultation Stage 2a sustainability appraisal of Merton's Local Plan](#) which was consulted on between November 2020 and February 2021 (see Figure 11: "proposed measures to monitor the effects of the Local Plan").
- 15.2. To address the issues raised in paragraphs 43 and 44 in the Inspector's Preliminary Matters, we propose **Main Modification MM19.1** that creates a new policy M19.1 Monitoring, which includes the Monitoring Framework previously contained as [Figure 10 of Document 0D3 Sustainability Appraisal of Merton's Local Plan](#), into the Local Plan.
- 15.3. Please note the following for the proposed Main Modification Table 19.1 "Local Plan Monitoring Framework" below:
 - the first two columns (thematic area and monitoring indicators) were contained in of [Document 0D3 Sustainability appraisal of Merton's Local Plan](#) and were subject to public consultation in earlier stages, as set out above, and
 - The final column, "target, is published in this Main Modification for the first time.

Main Modification 19.1

19 MONITORING

Policy M19.1 Monitoring

Merton Council will demonstrate the delivery of the Local Plan's spatial vision and strategic objectives by regularly monitoring the implementation of policies.

In the event that delivery falls significantly below what is required to achieve the necessary targets, the council will trigger a full or partial review of the plan in order to address the reasons for under-delivery.

Key indicators that may trigger a full or partial review are:

- A failure to demonstrate a 5-year housing land supply in any two successive monitoring years and the two monitoring years following that indicating no potential for recovery.
- Housing completions fall more than 20% beneath the targets in the housing trajectory over any rolling 3-year period.

Supporting text

- 19.1.1 Monitoring the Local Plan is crucial to the successful delivery of its vision and strategic objectives.
- 19.1.2 Section 113 of the Localism Act 2011 sets out the requirements for Authority Monitoring Reports (AMRs). Regulation 34 of The Town and Country Planning (Local Planning) (England) Regulations 2012 provides further detail on these requirements which are also reflected in the National Planning Practice Guidance (NPPG) on Local Plans.
- 19.1.3 Monitoring is required to ensure that the policies are relevant and effective. Monitoring allows us to understand whether policies have worked as they were intended.
- 19.1.4 Currently, the council has no reason to believe that the plan will not be implemented in full. However, the council accepts that there could be circumstances where development fails to come forward for a number of reasons, some of which are beyond the control of the council. These could include delivery challenges on a site or a more general slowdown in the economy and its ability to deliver viable development. Where the council can use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

Local Plan monitoring framework

- 19.1.5 The monitoring framework sets out the monitoring indicators for the Local Plan, which will be reported in the AMR (Authority Monitoring Report). The AMR is not the only monitoring tool. There are separate monitoring arrangements of other related strategies, for example, the climate change strategy and action plan, and the South London Waste Plan. The monitoring framework below relates to the performance of this Local Plan.
- 19.1.6 Regular monitoring will include analysis of delivery data and trends. Taking account of changes in legislation at the regional and national level. Reviewing the plan's supporting evidence base where necessary. If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to a full or partial review of the Local Plan and its policies.

Reviewing the plan

- 19.1.7 As required by the NPPF (National Planning Policy Framework) and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council will initiate a review of the plan within five years of adoption.

Local Plan monitoring framework		
Thematic area	Monitoring indicator	Target (if applicable)
<u>Growth Area (Opportunity area)</u>	<u>London Plan indicative target (up to 2041) to deliver 5,000 new homes and 6,000 jobs (indicative figure).</u>	<u>Cumulative housing completions since OA (Opportunity Area) designation.</u> <u>Cumulative non-residential floorspace approvals and completions since OA designation.</u>
<u>Air quality</u> <u>To reduce emissions and concentrations of harmful atmospheric pollutants,</u>	<u>Number of days p.a. when air pollution is moderate or high for PM10*</u> <u>*Daily mean particles</u>	<u>Decreasing number of days of high PM10 over a 3-year period.</u>

<p><u>particularly in areas of poorest air quality and reduce exposure.</u></p>	<p><u>(PM10) not to exceed 50 micrograms per cubic metre - more than 35 times a year at any measuring site.</u></p>	
<p><u>Biodiversity</u> <u>To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</u></p>	<p><u>Changes in areas of biodiversity importance.</u></p>	<p><u>No net loss of sites of importance for nature conservation (SINCS).</u></p>
<p><u>Land and soil condition and pollutants</u> <u>To conserve Merton's geodiversity and protect soils from development and over intensive use.</u></p>	<p><u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u></p>	<p><u>No planning permissions granted contrary to Environment Agency advice on flood risk and water quality grounds.</u></p>
<p><u>Sustainable land use</u> <u>To make the best and most efficient use of land to support sustainable patterns and forms of development.</u></p>	<p><u>Planning permissions granted and completed.</u></p>	<p><u>95% of major planning permissions started within a 3-year period.</u></p>
<p><u>Heritage (including architectural and archaeological heritage)</u> <u>To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.</u></p>	<p><u>Number of heritage assets on Historic England's Heritage at Risk Register.</u></p>	<p><u>A reduction in the number of heritage assets on the Heritage at Risk register.</u></p>

<p><u>Flood risk management</u></p> <p><u>To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</u></p>	<p><u>Number of planning permissions granted contrary to Environment Agency advice.</u></p> <p><u>Number and location of Environment Agency flood warnings issued across Merton each year.</u></p>	<p><u>No planning permissions granted contrary to Environment Agency advice.</u></p>
<p><u>Climate change</u></p> <p><u>To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</u></p>	<p><u>Reduction in carbon emissions from new build developments.</u></p> <p><u>Reporting on carbon offsetting proposed where on site reduction is not achievable.</u></p>	<p><u>Year on year decrease in carbon emissions from new development.</u></p> <p><u>Reporting on carbon offsetting in Infrastructure Funding Statement.</u></p>
<p><u>Noise and vibration</u></p> <p><u>To minimise noise, vibration levels and disruption to people and communities.</u></p>	<p><u>An increase in area of the Noise Action planning important areas.</u></p>	<p><u>No increase to area.</u></p>
<p><u>Water quality</u></p> <p><u>To protect and enhance Merton's water bodies.</u></p>	<p><u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u></p> <p><u>River water bodies classified under the Water Framework Directive to achieve good ecological status.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p> <p><u>No decrease of the Water Framework Directive classification of 'good' ecological status.</u></p>
<p><u>Water consumption</u></p> <p><u>Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</u></p>	<p><u>Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.</u></p> <p><u>Number and location of water pollution incidents reported to the Environment Agency across Merton annually.</u></p> <p><u>Water quality status of water bodies across borough.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p>

	<u>Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.</u>	
<u>Open space and nature</u>	<u>Net loss of designated open space for development.</u> <u>Metres of main river improved and restored across Merton.</u> <u>Biodiversity Net Gain delivered across Merton.</u>	<u>No net loss of designated open space.</u>
<u>Sustainable transport</u>	<u>Overall sustainable mode share.</u> <u>Uptake of low emission vehicles.</u>	<u>Increase in overall sustainable mode share based on a rolling three-year average.</u> <u>Increase in registered EV (Electric Vehicles) vehicles in Merton – measured annually.</u>
<u>Energy use</u>	<u>Average percentage improvement over Part L of the Building Regulations.</u>	<u>Compliance with local plan policy.</u>
<u>Health and wellbeing</u>	<u>Delivery of healthcare facilities identified in Merton’s Local Plan.</u> <u>Number of people taking up physical activities and stating they are in ‘good health.’</u> <u>Number of Health Impact Assessments (HIA) carried out.</u>	<u>n/a (Monitoring will be reported in the Health and Wellbeing Strategy annual update known as the Merton Story and added to the AMR.)</u> <u>All development proposals that meet the Local Plan policy requirements to submit a Health Impact Assessment.</u>

<p><u>Housing</u></p> <p><u>To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic changes and local housing demand.</u></p>	<p><u>Progress against borough wide affordable housing targets.</u></p> <p><u>Number of homes built each year.</u></p>	<p><u>Building regulation M4(3) – 10% of all new build self-contained homes.</u></p> <p><u>M4(2) – 90% of all new build self-contained homes.</u></p> <p><u>50% of all new homes to be affordable across the plan period.</u></p> <p><u>Of affordable homes, 70% to be low-cost rent 30% to be intermediate tenure.</u></p>
<p><u>Safe environments</u></p> <p><u>To contribute to safe and secure environments for all people including people with Protected Characteristics.</u></p>	<p><u>Number of Health Impact Assessments carried out and type of development.</u></p>	<p><u>Health Impact Assessments carried out for all developments required by policy.</u></p> <p><u>Increase in % of people feeling safe as measured in Merton Residents Survey.</u></p> <p><u>Yearly decrease in serious crime and crime against people with Protected Characteristics.</u></p>
<p><u>Infrastructure</u></p> <p><u>To ensure that environmental, social and physical infrastructure is managed and delivered to support demographic change.</u></p>	<p><u>Delivery of infrastructure projects identified in the Infrastructure Delivery Plan.</u></p>	<p><u>Number of infrastructure projects delivered.</u></p>
<p><u>Design</u></p> <p><u>To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</u></p>	<p><u>Increase in number of major schemes reviewed by the Design Review Panel at pre – application stage.</u></p>	<p><u>% Of planning appeals allowed by the Planning Inspector for applications originally refused for design reasons by the council.</u></p>
<p><u>Local employment</u></p>		

<p><u>To develop and maintain a healthy labour market.</u></p>	<p><u>Number of people unemployed.</u></p> <p><u>Number of new jobs created.</u></p>	<p><u>% Of people unemployed lower than regional and national averages.</u></p> <p><u>Increase in number of new jobs created.</u></p>
<p><u>Education and skills</u></p> <p><u>To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.</u></p>	<p><u>Development of floorspace to meet the needs for pupil places.</u></p> <p><u>Number of 16- 24-year-olds in training or apprenticeships or work programmes.</u></p> <p><u>Number of local people employed or in training as part of large or regeneration developments.</u></p>	<p><u>Delivery of necessary education floorspace</u></p> <p><u>Yearly increase in the number of apprenticeships or work programmes.</u></p> <p><u>All major developments to provide local people with employment and/or training opportunities.</u></p>
<p><u>Economic growth and town centres</u></p> <p><u>To increase the vitality and viability of existing town centres, local centres and parades.</u></p>	<p><u>Undertake the shopping survey to measure the retail vacancy rate in Merton's town centres below national and regional rates.</u></p>	<p><u>Maintain the retail vacancy rate below national and regional averages in Merton's town centres.</u></p> <p><u>No net loss of employment floorspace in Strategic Industrial Locations.</u></p>

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

Inspectors' letter:

54 (p) Your view on whether activity relating to the examination might be restricted during the pre-election period (see paragraph 48 above);

General Matters relating to the pre-election period

48. We would welcome the Council's view whether any actions it might have to take in response to this letter, might be restricted were they to take place during the pre-election period. Similarly, your view as the appropriateness of the publication of our Matters, Issues and Questions, and of any hearing statements that are submitted in response to these, during that pre-election period would also be welcomed.

Council response

- 16.1. Local elections take place in all London boroughs on Thursday 5th May 2022. The pre-election period starts on Friday 25th March 2022. The pre-election restrictions are governed by Section 2 of the Local Government Act 1986, (as amended) and means in summary that councils should '*not publish any material which, in whole or in part, appears to be designed to affect public support for a political party*'
- 16.2. If this letter (the Inspectors' Preliminary Matters for Merton dated 28th Jan 2022) was to have been published during the pre-election period, it would not have restricted the actions we have had to take to respond to it.
- 16.3. It is our view that the publication of the Planning Inspectors' Matters, Issues and Questions to all parties would not be restricted by the pre-election period.
- 16.4. However, it may be that, in responding to the Planning Inspectors' Matters, Issues and Questions, one or more responses received from any participant contains information or viewpoints that others may consider politically sensitive.
- 16.5. To avoid any potential for this while ensuring that the Examination proceeds in an efficient and timely manner, it is recommended that no response to the Inspectors Matters, Issues and Questions is uploaded onto the council's website (i.e. published) until Friday 6th May 2022, outside the pre-election period. This would allow the Programme Officer to receive responses on behalf of the Inspectors at any time; it is the publication of those responses on the council's website that would be restricted for a short time until outside the pre-election period.
- 16.6. The views of the council's Monitoring Officer have been taken into account in responding to this question.

Response to Inspectors' Preliminary Matters for Merton Council dated 28th January 2022

Inspectors' letter:

54 (q) Actions related to identifying superseded policies, and the status of the Estates Local Plan (see paragraphs 49 and 50);

Superseded policies and the adopted development plan

49. *Regulation 8(5) of the 2012 Regulations requires DPDs to make clear which policies are superseded. However, it is not abundantly clear which adopted policies are superseded by the Local Plan. Please could you make available suggested MM (e.g. a table in the Local Plan showing which development plan policies it would supersede) to ensure the effectiveness and regulatory compliance of the Local Plan in these regards.*

Council response

17.1. Main **Modification MM18.1** is proposed to show which development policies are to be superseded to be added to the Chapter 18 Appendices.

Main modification M18.1

Appendices

Once adopted the Local Plan will supersede all existing policies in Merton's Core Planning Strategy (2011), Sites and Policies Plan (2014) and the Policies Map (2014).

The following table lists the policies from Merton's Core Planning Strategy (2011), the Sites and Policies Plan (2014) and the Policies Map (2014) which are:

- Superseded by the Local Plan or,
- Not taken forward

The Estates Local Plan (2018) and the South London Waste Plan (2012 and its 2022 review) are not affected. The policies in these documents will be not be superseded by the new Local Plan and remain part of Merton's Local Plan.

Core Planning Strategy (2011) policies replaced by the forthcoming Local Plan

<u>Core Planning Strategy policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>Issues and options.</u>	<u>Good growth chapter</u>
<u>Merton's Core Strategy Spatial Vision.</u>	<u>Chapter 01c: Urban development objectives and vision.</u>
<u>Key Diagram (Figure 8.1 Key Diagram).</u>	<u>Figure 1: Merton's spatial strategy.</u>
<u>Policy CS 1 Colliers Wood.</u>	<u>Policy N3.1: Colliers Wood.</u>
<u>Policy CS 2 Mitcham Town Centre.</u>	<u>Policy N4.1 Mitcham.</u>
<u>Policy CS 3 Morden Town Centre.</u>	<u>Policy N5.1; Morden.</u>
<u>Policy CS 4 Raynes Park Local Centre.</u>	<u>Policy N6.1: Raynes Park.</u>
<u>Policy CS 5 Wandle Valley.</u>	<u>Policy O15.6 Wandle Valley Regional Park.</u>
<u>Policy CS 6 Wimbledon Town Centre.</u>	<u>Policy N9.1: Wimbledon.</u>
<u>Policy CS 7 Centres.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 8 Housing Choice.</u>	<u>Strategic Policy H11.1 Housing choice</u>
<u>Policy CS 9 Housing Provision.</u>	<u>Strategic Policy H11.2 Housing provision</u>
<u>Policy CS 10 Accommodation for Gypsies and Travellers.</u>	<u>Policy No. H11.6 Accommodation for Gypsies and Travellers.</u>
<u>Policy CS 11 Infrastructure.</u>	<u>Strategic policy IN 14.1 Infrastructure.</u>
<u>Policy CS 12 Economic Development.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 13 Open space, nature conservation, leisure and culture.</u>	<u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation.</u>
<u>Policy CS 14 Design.</u>	<u>Strategic Policy D12.1 Delivering well-designed and resilient neighbourhoods.</u>
<u>Policy CS 15 Climate Change.</u>	<u>Strategic Policy CC2.1: Promoting Sustainable Design to Mitigate and Adapt to Climate Change.</u>
<u>Policy CS 16 Flood Risk Management.</u>	<u>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage.</u>
<u>Policy CS 17 Waste Management.</u>	<u>Strategic Policy W14.4 Waste Management.</u>
<u>Policy CS 18 Active Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 19 Public Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 20 Parking, Servicing and Delivery.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Chapter 27 Delivery and Implementation (Delivery of the Spatial Strategy and Core Policies).</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>
<u>Chapter 28 Monitoring Framework.</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>

Sites and Policies Plan (2014) policies replaced by the forthcoming Local Plan

<u>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>DM R1 Location and scale of development in Merton's town centres and neighbourhood parades.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R2 Development of town centre type uses outside town centres.</u>	<u>Policy TC 13.6 Development of town centre type uses outside town centres.</u>
<u>DM R3 Protecting corner/ local shops.</u>	<u>Policy TC13.7 Protecting corner / local shops</u>
<u>DM R4 Protection of shopping facilities within designated shopping frontages.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R5 Food and drink / leisure and entertainment uses.</u>	<u>Policy TC13.8 Food and drink / leisure and entertainment.</u>
<u>DM R6 Culture, arts and tourism development.</u>	<u>Policy TC13.9 Culture, arts and tourism development.</u>
<u>DM R7 Markets.</u>	<u>Policy not taken forward.</u>
<u>DM H1 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>	<u>Policy No. H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>
<u>DM H2 Housing mix.</u>	<u>Policy No. H11.3 Housing mix</u>
<u>DM H3 Support for affordable housing.</u>	<u>Policy No. H11.1 Housing choice</u>
<u>DM H4 Demolition and redevelopment of a single dwelling house.</u>	<u>Policy not taken forward.</u>
<u>DM H5 Student housing, other housing with shared facilities and bedsits.</u>	<u>Policy No. H11.5 Student Housing, other housing with shared facilities and bedsits</u>
<u>DM C1 Community facilities.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM C2 Education for children and young people.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM E1 Employment areas in Merton.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E2 Offices in town centres.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E3 Protection of scattered employment sites.</u>	<u>Policy EC13.3 Protection of scattered employment sites</u>
<u>DM E4 Local employment opportunities.</u>	<u>Policy EC.13.4 Local Employment Opportunities</u>
<u>DM O1 Open space.</u>	<u>Policy O15.2 Open Space and Green Infrastructure</u>
<u>DM O2 Nature conservation, trees, hedges and landscape features.</u>	<u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.4 Protection of Trees</u>
<u>DM D1 Urban design and the public realm.</u>	<u>D12.2 Urban design</u>

<u>DM D2 Design considerations in all developments.</u>	<u>D12.3 Ensuring high quality design for all developments</u>
<u>DM D3 Alterations and extensions to existing buildings.</u>	<u>Policy D12.4 Alterations and extensions to existing buildings</u>
<u>DM D4 Managing heritage assets.</u>	<u>Policy D12.5 Managing heritage assets</u>
<u>DM D5 Advertisements.</u>	<u>Policy D12.7 Advertisements</u>
<u>DM D6 Telecommunications.</u>	<u>Policy D12.8 Digital infrastructure</u>
<u>DM D7 Shop front design and signage.</u>	<u>Policy D12.9 Shop front design and signage</u>
<u>DM EP1 Opportunities for decentralised energy networks.</u>	<u>Not taken forward.</u>
<u>DM EP2 Reducing and mitigating noise.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM EP3 Allowable solutions.</u>	<u>Not taken forward</u>
<u>Policy DM EP4 Pollutants.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM F1 Support for flood risk management.</u>	<u>Policy F15.8 Managing Local Flooding</u>
<u>DM F2 Sustainable urban drainage systems (SUDS) and; wastewater and water infrastructure.</u>	<u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u>
<u>DM T1 Support for sustainable transport and active travel.</u>	<u>Policy T16.2 Prioritising active travel choices</u>
<u>DM T2 Transport impacts of development.</u>	<u>Policy T16.3 Managing the transport impacts of development</u>
<u>DM T3 Car parking and servicing standards.</u>	<u>T16.4 Parking, deliveries and servicing</u>
<u>DM T4 Transport infrastructure.</u>	<u>T16.5 Supporting transport infrastructure</u>
<u>DM T5 Access to the Road Network.</u>	<u>Not taken forward</u>
<u>Appendices (A –L).</u>	<u>Chapter 17: Appendices</u>
<u>Policies Map (2014)</u>	<u>Policies Map (submitted 2022)</u>

50. You should also consider whether the status of the Estates Local Plan (adopted February 2018) is accurately reflected in the Local Plan's introduction (paragraphs 1.15ff).

17.2. The council is proposing an additional modification, which is set out in Schedule of Additional Modifications to Merton's Draft Local Plan (0D4b). AM1.1 sets out clearly the status of the Estates Local Plan (Submitted Document 0D25).

Additional modification AM1.1:

Paragraph 1.1.8 Once adopted the Local Plan will supersede all existing polices in Merton's Core Planning Strategy (2011), Sites and Policies Plan (2014) and the Policies Map (2014). Together with the London Plan, the South London Waste Plan (2012 and to be ~~once they are~~ adopted 2022) and the Estates Local Plan 2018; the Local Plan will form the Statutory Development Plan for Merton under section 38 of the 2004 Planning and Compulsory Purchase Act.

Response to Inspectors' Preliminary Matters for Merton Council - 28th January 2022

Inspectors' letter:

54 (r) Inclusion of relevant documents in the Examination Library – (see paragraph 51

Examination Library

We would appreciate confirmation from the Council that all documents and evidence that should be in the examination library have been included. We have picked up several references to documents in the Local Plan that do not appear in the library itself, and it would be useful for these, or relevant links to them to be uploaded as soon as possible. We will send our list through to the Council via the PO (Programme Officer).

Council response

- 18.1. Table 54r below contains the document names, links to where they can be accessed and proposed Examination Library reference numbers.
- 18.2. The second part of Table 54r contains documents that the council proposes for the Examination library that are not contained in the Inspectors' list but are either referenced in the Regulation 19 Local Plan or have arisen from responses to the Inspectors' Preliminary Matters and Questions.

Table 54r Documents referred to in local plan that might not be in the exam library

Letter from inspectors dated 28th January 2022

“51 Examination Library: We would appreciate confirmation from the Council that all documents and evidence that should be in the examination library have been included. We have picked up several references to documents in the Local Plan that do not appear in the library itself, and it would be useful for these, or relevant links to them to be uploaded as soon as possible. We will send our list through to the Council via the PO”.

[Link to Merton’s examination library](#)

Name of document	Where inspectors have found it in the Local Plan (Reg 19)	Link to document	Proposed new reference number for the exam library
Conservation Area Character Appraisals	paragraph 12.1.1 and elsewhere	Already in examination library as Document 12D9	
Air Quality Action Plan	mentioned on page 11 and elsewhere	Already in examination library as Document 0D24	
GLA’s “Be Seen” Energy Monitoring Guidance	paragraph 2.3.19	Already in examination library as Document 2D38	
RTPI (Royal Town Planning Institute) Report – Enabling Healthy Place-making	paragraph 10.1.10	https://www.rtpi.org.uk/research/2020/july/enabling-healthy-placemaking/	10D10
TCPA (Town and Country Planning Association) 20 Minute Neighbourhood Guidance	paragraph 10.1.14	https://www.tcpa.org.uk/the-20-minute-neighbourhood	10D4
Mayor of London Health Inequality Strategy	paragraph 10.1.20	https://www.london.gov.uk/what-we-do/health/health-inequalities/london-health-inequalities-strategy	10D9
RTPI Creating Better Environments for People Living with dementia.	paragraphs 10.1.28; 11.4.9	https://www.rtpi.org.uk/practice/2020/september/dementia-and-town-planning/	10D5

The Place Standard Toolkit	paragraph 10.1.29	https://www.placestandard.scot/	10D8
Design for Dementia: Level one	paragraph 10.1.30	https://www.hlpdesign.com/images/case_studies/Vol1.pdf	10D6
Design for Dementia: Level two	paragraph 10.1.30	https://www.hlpdesign.com/images/case_studies/Vol2.pdf	10D7
TfL's London Cycling Design Standards (Chapter 8 Cycle Parking)	Policy D12.3 Also Referred to in para 16.2.11	LCDS Chapter 8 Cycle Parking (tfl.gov.uk)	16D4
Merton's Waste and Recycling Storage Requirements	Policy D12.3	https://www.merton.gov.uk/system/files?file=waste2020recycling20storage20guide20-202019.pdf	12D19
Merton's Vehicle Crossover Information Park	paragraph 12.3.12	https://www.merton.gov.uk/system/files?file=vehicle20crossover20information20pack20a20-20202020-20final20for20web.pdf	12D20
Merton's Sustainable Drainage SPD (Supplementary Planning Documents)	12.10.19	Already in the Examination library as Document 15D11 Merton Sustainable Drainage Design and Evaluation Guide	
The recommendations of the Institute of Lighting Professionals	Policy 15.10	https://theilp.org.uk/resources/	15D12
Non-road mobile machinery practical guide	Policy 15.10	https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/nrmm	15D13
Right Waste, Right Place Guidance	Policy 15.10	http://www.rightwasterightplace.com/#close	15D14
Waste Management Duty of Care Practice	Policy 15.10	https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice	15D15

TfL (Transport for London) Guidance on Delivery and Servicing Plans	15.10.4626	https://content.tfl.gov.uk/delivery-and-servicing-plan-guidance.pdf	16D5
DEFRA Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems. Control of Odour and Noise from Commercial Kitchen Exhaust Systems (prepared by NETCEN for the Department for Environment, Food and Rural Affairs).	15.10.28	https://ee.ricardo.com/downloads/air-quality/control-of-odour-and-noise-from-commercial-kitchen-exhaust-systems	15D6
TfL Construction Logistics Guidance	referred to in para 16.3.6	TfL Construction Logistics Plan guidance	16D6
TfL Vision Zero for London	referred to in Policy 16.3	Vision Zero action plan (tfl.gov.uk)	16D7
TfL Travel Plans guide	referred to in para 16.3.5	Travel plans - Transport for London (tfl.gov.uk)	16D8
TfL's Parking Design and Management Plan Guidance	Policy T16.4	When the council prepared Regulation 19 / Stage 3, it was partly based on TfL's responses to Local Plan consultation, which requested that Merton refer to this forthcoming TfL guidance. As at March 2022, TfL has now confirmed that this guidance will not be produced until after 2022. Therefore, we are proposing an Additional Modification to remove reference to <i>TfL's parking, design and management plan guidance</i> from Merton's Local Plan.	N/A
Consultation Representation: Historic England's comments on the stage 2a			

Consultation and a letter of 4 February 2021.			
Decarbonising Transport.	Referred to in 16.1.2	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf	16D9
		Decarbonising Transport	
Cycle Infrastructure Design LTN1/20	Referred to in para 16.2.7	Cycle Infrastructure Design (publishing.service.gov.uk)	16D10
TfL Streets Toolkit	Referred to in para 16.2.7	Streets toolkit - Transport for London (tfl.gov.uk)	16D11
TfL Streetscape Guidance	Referred to in para 16.2.7	Streetscape Guidance (tfl.gov.uk)	16D12
London Cycling Design Standards	Referred to in para 16.2.7	London Cycling Design Standards	16D13
TfL Guidance on Transport Assessments	16.3.1	Transport Assessments - Transport for London (tfl.gov.uk)	16D14
Infrastructure for the charging of electric vehicles.	Referred to in para 16.4.15	Approved Document S: Infrastructure for the charging of electric vehicles (publishing.service.gov.uk)	16D15

Additional documents - to add to the Examination Library list below not listed by Inspectors, identified through the Strategic Policies review and responses to the Inspectors' Preliminary Matters and Questions.

Name of document	Link to document	Proposed new reference number for the exam library	
Government Clean Air Strategy (2019)	https://www.gov.uk/government/publications/clean-air-strategy-2019	10D8	
Views of the National Infrastructure Commission	Net-Zero-Report-May-2020.pdf (nic.org.uk)	2D48	
GLA (Greater London Authority) zero carbon pathway modelling	Pathways to Net Zero Carbon by 2030 London City Hall	2D49	
Greater London Authority / Merton Statement of Common Ground	Response to Inspectors Preliminary Questions paras 14-15	Submitted in PDF format. To be added to Examination library	0D13a
London Borough of Wandsworth SoCG (Statements of Common Ground)	Response to Inspectors Preliminary Questions paras 14-15	Submitted in PDF format. To be added to Examination library	0D13b
London Borough of Croydon SoCG	Response to Inspectors Preliminary Questions paras 14-15	Submitted in PDF format. To be added to Examination library	0D13c
London Borough of Sutton SoCG	Response to Inspectors Preliminary Questions paras 14-15	Submitted in PDF format. To be added to Examination library	0D13d
Royal Borough of Kingston upon Thames SoCG	Response to Inspectors Preliminary Questions paras 14-15	Submitted in PDF format. To be added to Examination library	0D13e

2019 correspondences with Local Planning Authorities on housing matters	Response to Inspectors Preliminary Questions paras 14-15	Submitted in PDF format. To be added to Examination library	0D13f
Transport for London Statement of Common Ground	Response to Inspectors Preliminary Questions paras 14-15	Submitted in PDF format. To be added to Examination library	0D13g
Flood and Water Management Act 2010		Flood and Water Management Act 2010 (legislation.gov.uk)	15D12
Flood Risk Regulations 2009		The Flood Risk Regulations 2009 (legislation.gov.uk)	15D13
The European Water Framework Directive 2000 transposed into law through the Water Environment (Water Framework Directive) England and Wales Regulations 2003		The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 (legislation.gov.uk)	15D14
National Flood and Coastal Erosion Risk Management Strategy for England (2020)		National Flood and Coastal Erosion Risk Management Strategy for England - GOV.UK (www.gov.uk)	15D15

Correction to Document 0D4i Merton’s Local Plan incorporating proposed modifications March 2022 and Schedule of Main Modifications 2022-03

Submitted 11th March 2022

0D4i Merton’s Local Plan incorporating proposed modifications March 2022 pages 360 and 361 paragraph 11.2.7 and Schedule of Main Modifications 2022-03 page 17 MM1.1 should correctly state:

11.2.7 As Figure 4.2.2 below indicates Merton’s annual housing target will be set at ~~775~~ 700 homes per annum for the period ~~2022/23~~ ~~2021/22~~, increasing to 950 for the period 2024 /25 – 2026/27 ~~2023/24~~, and then increase to ~~1,080~~ 1,555 for 2027/28 - 2028/29 ~~the period 2024/25-~~.

0D4i Merton’s Local Plan incorporating proposed modifications March 2022 page 361 Figure 4.4.2 and Schedule of Main Modifications 2022-03 page 17 should correctly state:

	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Shortfall from 2019/20 and 2020/21	Total
Merton Local Plan target	775 <u>750</u>	775 <u>700</u>	775 <u>700</u>	1,080 <u>950</u>	1,080 <u>950</u>	1,080 <u>950</u>	1,350 <u>1,555</u>	1,350 <u>1,555</u>		8265 <u>7,360</u>
London Plan target	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	<u>928</u>	8265 <u>6,426</u>

0D4ai - Schedule of Main Modifications to Merton's Draft Local Plan – March 2022

~~Red strikethrough~~ text indicates a proposed deletion

Red underlined text indicates a proposed addition to the text

Text in *italics* in the Proposed Changes column have a descriptive or instructive function and do not represent text to be retained unchanged.

The page and paragraph numbers are those in the [Stage 3 pre-submission draft Local Plan consulted on 22 July to 6 September \(Ref. 0D1\)](#)

An absent Mod Ref. number in a sequence of numbers represents a former modification that is no longer proposed.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM1.1	14	1 st sentence below sub heading: Identifying Merton's Growth areas	A considerable proportion of Merton's growth up to 2036/ <u>37</u> and beyond is, expected to be, delivered in the Opportunity Area (OA). The OA is, designated in the London Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton's OA.	To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year plan period to be 2022/23 - 2036/37.	March 2022 – response to Inspectors' preliminary matters
MM1.1	32	Spatial vision, 1 st sentence	By 2036/ <u>37</u> Merton will:	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM1.1	37	2.1.11	Current housing projections for Merton indicate that <u>a minimum of 11,374 additional homes will be built during the plan period around 29,000 new dwellings could be built in Merton between 2021 and 2050.</u> Policy must therefore ensure that new development in Merton does not create a legacy of poor performance that will require remedial action in the future and add to Merton's retrofit burden. In their Climate Emergency Design Guide (2020), the London Energy Transformation Initiative (LETI) concluded that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025. Footnote 2 - Refer to Policy H11.2. Based on sites identified to be delivered during the 15 year plan period and an assumed delivery of the Intend to Publish London Plan 2021 target for Merton of 918 new dwellings per year for the remaining 15 years to 2050. See Housing policies for further details.	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters

MM1.1	373	Places & Spaces in a Growing Borough, Introduction, 2 nd paragraph	The need to deliver more than 10,000 homes in Merton by 2036/37 does not outweigh the need for developments to be design-led. The Council will require all development to be of the highest design quality and contribute to the Merton's long-term economic prosperity, quality of life and a net zero carbon future.	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM2.1	35	2.1.1	In accordance with Paragraph 149 of the NPPF 2019 and Paragraph 152 3 of the Draft NPPF 2021, 'Plans should take a proactive approach to ...	To improve accuracy and demonstrate the soundness of the Local Plan with regards to the latest NPPF published July 2021. Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors' Preliminary Letter March 2022	March 2022 – response to Inspectors' preliminary matters
MM2.2	42	Policy CC2.2 Minimising Greenhouse Gas Emissions, part b	To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended.	March 2022 – response to Inspectors' preliminary matters
MM2.2	51	Climate Change CC2.3 Minimising Energy Use, part e	From <u>01 January</u> 2025, to meet the <u>following</u> maximum Energy Use Intensity targets as set out in the relevant guidance.;	To ensure that the policy is justified and legally sound, all policy requirements to conform to	March 2022 – response to Inspectors' preliminary matters

			<ul style="list-style-type: none"> ○ <u>Residential – 35 kWh/m2/yr</u> ○ <u>Offices – 55 kWh/m2/yr</u> ○ <u>Schools – 65 kWh/m2/yr</u> ○ <u>Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr</u> ○ <u>Retail – 55 kWh/m2/yr</u> ○ <u>Leisure – 100 kWh/m2/yr</u> ○ <u>Higher education teaching facilities – 55 kWh/m2/yr</u> ○ <u>Light industrial uses – 110 kWh/m2/yr</u> ○ <u>GP surgery – 55 kWh/m2/yr</u> ○ <u>Hotel – 55 kWh/m2/yr</u> 	guidance have been removed or amended. Specific Energy Use Intensity targets were added instead based on new evidence commissioned by Greater Cambridge Shared Planning.	
MM2.2	56	2.3.22 and new paragraph	<p>Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to future proof their development and lead the way in decarbonising Merton until EUI targets are required through national regulations or a locally derived methodology. Merton Council will enforce EUI targets from 2025; these targets will be confirmed in relevant guidance closer to the time in order to consider the latest evidence and technologies. In 2021, Etude carried out a feasibility study [25] to inform the Net Zero Carbon Evidence Base for the Greater Cambridge Local Plan [26] which identified the following Energy Use Intensity targets for a range of development types:</p> <ul style="list-style-type: none"> ● <u>Residential – 35 kWh/m2/yr</u> ● <u>Offices – 55 kWh/m2/yr</u> ● <u>Schools – 65 kWh/m2/yr</u> ● <u>Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr</u> ● <u>Retail – 55 kWh/m2/yr</u> ● <u>Leisure – 100 kWh/m2/yr</u> ● <u>Higher education teaching facilities – 55 kWh/m2/yr</u> ● <u>Light industrial uses – 110 kWh/m2/yr</u> ● <u>GP surgery – 55 kWh/m2/yr</u> ● <u>Hotel – 55 kWh/m2/yr</u> 	See above -MM2.2 at Page 51 Plan Ref. Policy CC2.3, part e. References also added.	March 2022 – response to Inspectors' preliminary matters

			<p><u>New Paragraph - Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to reduce fuel bills for future occupants and help tackle fuel poverty in Merton, and to future-proof their development and lead the way in decarbonising Merton. These targets, or subsequently adopted targets, will be enforced from January 2025.</u></p> <p><u>[25] Bioregional, Etude, Currie & Brown, “Greater Cambridge Local Plan: Net Zero Carbon Evidence Base. Task D - Technical Feasibility,” May 2021. [Online]. Available: Feasibility study https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/NetZeroTechnicalFeasibility_GCLP_210831.pdf.</u></p> <p><u>[26] Bioregional, Etude, Currie & Brown, Mode, “Greater Cambridge Net Zero Carbon Evidence Base Non-technical summary,” August 2021. [Online]. Available: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Greater%20Cambridge%20Local%20Plan%20Net%20Zero%20Carbon%20Evidence%20Base%20-%20Non%20Technical%20Summary%20FINAL.pdf.</u></p>		
MM2.2	255	Policy N7.1 part d	Support developments in the Local Centre that create a well-designed shopfront in accordance with Merton’s shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	268	Policy N9.1, part h	h. Promoting good placemaking by providing places for people to meet, relax, enjoy events and participate in the town centre. as set out in the public space framework in the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	281	Site Allocation Wi2	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters

MM2.2	288	Site Allocation Wi5	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	290	Site Allocation Wi6	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	299	Site Allocation Wi9	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	302	Site Allocation Wi10	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	305	Site Allocation Wi11	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	311	Site Allocation Wi13	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	314	Site Allocation Wi15	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	318	Site Allocation Wi16	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters

MM2.2	334	Policy H11.1, part i	For schemes of 10 homes and above, affordable housing is required to be provided on-site. In exceptional circumstances, where the applicant has robustly demonstrated to the council that on-site provision is not feasible, we may consider a financial contribution equivalent. This justification must include the provision of a detailed financial appraisal. For these schemes, off-site and cash in lieu schemes must accord with the requirements set out in The London Plan and have regard to the Mayor's Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	346	Policy H11.2, part c	Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 and having regard to Merton's design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	374	Policy D12.1, part a	Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and have regard to existing and emerging good practice guidance.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	378	Policy D12.2, part a	Be of the highest standard and have regard adhere to the most appropriate policy guidance and best practice.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	544	Policy P15.10, part b	Several policies in the local plan contribute to reducing and/or mitigating the impacts of air pollution such as transport, green infrastructure, design and climate change policies. Developers must have regard to follow any guidance provided by Merton Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	546	Policy P15.10, part r	Development proposals for leisure, sport and/or play facilities must have regard to follow Sport England's Artificial Lighting Guidance and London Plan policy S5 Sports and recreation facilities.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters
MM2.2	548	Policy P15.10, part bb, i	Its essential construction and demolition sites have regard to follow the Right Waste Right Place guidance and Waste Management Duty of care of practice to ensure construction and demolition waste is, managed correctly to prevent pollution and miss description of waste.	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters

					preliminary matters
MM3.1	81	Colliers Wood: Policy N3.1, New part after f	<u>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.</u>	<p>To be in general conformity with London Plan Policy D9 Tall Buildings, with particular reference to part B1, the policy D12.6 Tall building now specifies where tall buildings will be acceptable. Strategic Heights Diagrams have been introduced to show specific locations that are appropriate for tall buildings. The Strategic Height Diagrams provide a range of appropriate heights on the specific town centre locations.</p> <p>Colliers Wood Policy N3.1, Morden Policy N5.1 and Wimbledon Policy N9.1 now specify that tall buildings will only be supported when they are accordance with the details in the</p>	November 2021 – for submission

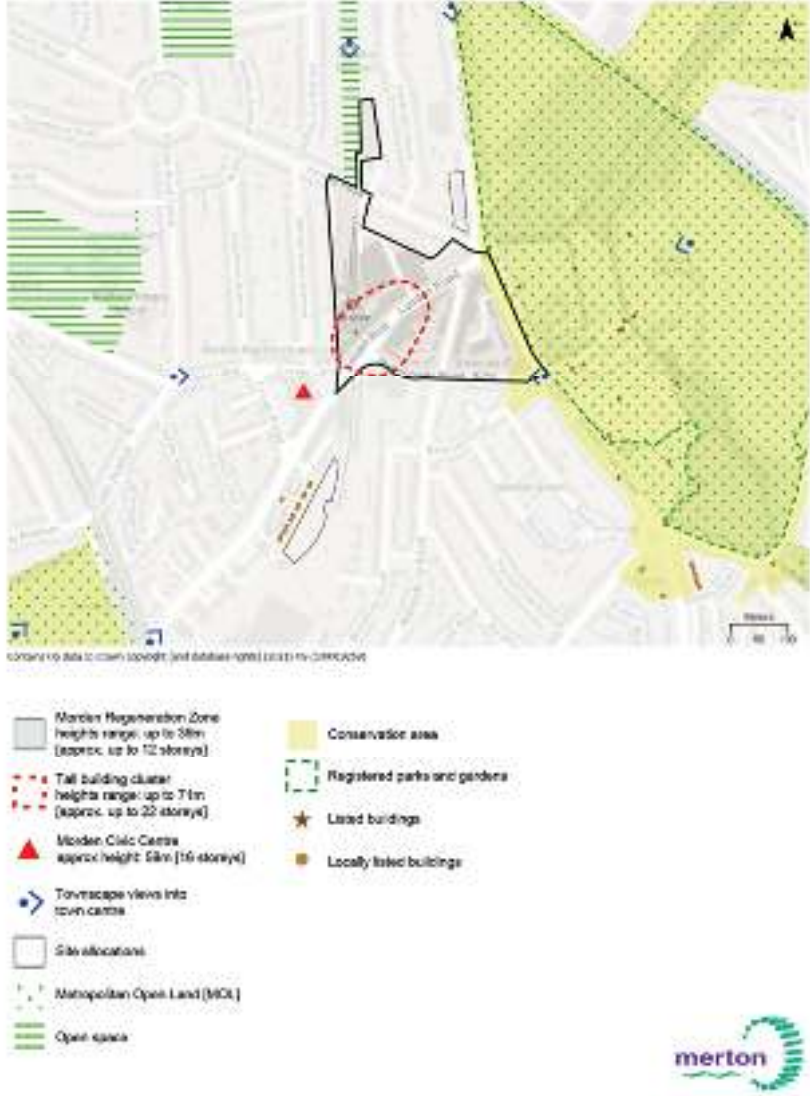
				<p>relevant Strategic Heights Diagrams and the policy D12.6.</p> <p>These changes have been developed in consultation GLA officers, following the Mayor of London's Stage 3 response.</p>	
MM2.1	84	3.1.10	In this circumstance, we would not be able to encourage new town centre uses in Colliers Wood as supporting large “out of centre” shops, offices and leisure development is contrary to the NPPF (National Planning Policy Framework) 2019 <u>2021</u> (chapter 7), the London Plan and Merton’s own planning policies.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM3.1	121	Site Allocation Mi1 Benedicts Wharf	Approach to tall buildings: The size of the site allows for a masterplanned approach which could contain taller buildings <u>of up to 10 storeys subject to consideration of design policies.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters
MM3.1	161	Site allocation Mi16 Mitcham Gasworks	Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings <u>of up to 9 storeys</u> subject to consideration of <u>design policies impacts on existing character, heritage and townscape.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters
MM4.1	119	Site Allocation Mi1 Benedict Wharf	Further information: The draft South London Waste Plan 2021-2036 <u>2022-2037</u> which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and has been submitted to the Secretary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.	To improve accuracy and ensure soundness, the plan period for the SLWP has been updated, in line with the	March 2022

				current EiP process.	
MM4.1	502	14.3.30	In 2018, the London boroughs of Croydon, Kingston, Merton and Sutton started working on the next version of the South London Waste Plan, making the most of their strong track record and commitment to joint working and helping to deliver the new London Plan's policies and de-risk the delivery of essential infrastructure for south London. The new South London Waste Plan will address waste management needs during the 15-year period from 2021 till 2036 <u>2022 til 3027</u> .	See above MM4.1, page 119.	March 2022
MM5.1	173	Morden: Policy N5.1, KEY OBJECTIV ES: MORDEN	Providing more high quality homes Incorporate Provide new homes in the <u>Morden and in particular, within the Morden Regeneration Zone</u> Wider Morden Town Centre Area with a diverse mix of housing sizes and tenures.	To improve clarity and accuracy of where the majority of new homes will be delivered.	November 2021 – for submission

				<p>Main Modification MM3.1 results in tall buildings only being supported within the Morden Regeneration Zone (Mo1). The removal of references to the potential appropriateness of tall buildings within some locations in the Wider Morden Town Centre Area (WMTCA), but outside the Morden Regeneration Zone, results in the designation of the WMTCA no longer being justified, as development proposals within this area could be addressed by means of other policies within the draft Local Plan and the London Plan. All references to the WMTCA are therefore proposed to be removed.</p> <p>As the details of a possible future Opportunity Area Planning</p>	
--	--	--	--	--	--

				Framework are still unknown, it is considered reasonable and justified to include the former WMTCA in the Merton Opportunity Area boundary.	
MM5.1	176	Morden: Policy N5.1 map	<i>Delete map</i>	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	176	Morden: Policy N5.1 text	This will be achieved through the delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes include intensification and...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	177	Morden: Policy N5.1 part c	Incorporating 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.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	177	Morden: Policy N5.1 part d	Incorporating green infrastructure that contributes to improved drainage, air quality and the creation of green links through the Morden Regeneration Zone and the Wider Morden Town Centre Area , connecting to...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM3.1	178	Morden: Policy N5.1 part 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.	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1	November 2021 – for submission
MM5.1	178	Morden: Policy N5.1 part f	Supporting an appropriate mix of retail, office, community and leisure uses, including night time uses, within the Morden Regeneration Zone and the Wider Morden Town Centre Area , which provide an appropriate level of active frontage and do not have an undue impact on neighbouring amenity.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	178	Morden: Policy N5.1 part h	Supporting incremental site-by-site development outside the Morden Regeneration Zone but within the Wider Morden Town Centre Area, where it: <ul style="list-style-type: none"> • is of a high-quality design, • complements and co-ordinates with the surrounding built form and public realm, • supports the delivery of new homes and complementary town centre uses, and 	See above - initial MM5.1 at Page 173	November 2021 – for submission

			<ul style="list-style-type: none"> • makes it easier for all to get around and in particular, encourages walking and cycling 		
MM5.1	178	Morden: Policy N5.1 part i	Ensuring that development within the Morden neighbourhood (AM5.11), which surrounds the Wider Morden Town Centre Area , conserves and enhances its suburban character of terraced and semi-detached homes and abundant green infrastructure.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	178	Morden: Policy N5.1 part j	Supporting transport improvements within the Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area (MM5.1), such as improvements to the existing tram network and improvements that help enable <u>sustainable and</u> active travel <u>choices</u> (AM5.12a).	See above - initial MM5.1 at Page 173	November 2021 – for submission

MM3.1	178	Policy N5.1	<p><i>Insert the diagram after the last policy bullet point</i></p> 	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM5.1	181	5.1.12	<p>The <u>Wider Morden Town Centre Area</u> <u>Morden town centre</u> is within an Opportunity Area as designated in the London Plan 2021... ...produce an Opportunity Area Planning Framework which will include the significant contribution that the <u>Wider Morden Town Centre Area</u> <u>Morden Regeneration Zone</u> will</p>	See above - initial MM5.1 at Page 173	November 2021 – for submission

			make towards the Opportunity Area's target to accommodate 5000 new homes and 6000 new jobs.		
MM5.1	182	5.1.20	The part of the Wider Morden Town Centre Area that is outside the Morden Regeneration Zone, is the area for incremental change, where the design and layout of public realm and streetscape is to be actively co-ordinated by the council, so that the Morden Regeneration Zone sits well within the local context.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	183	5.1.25	We will continue to work with Transport for London and others to provide good links between the Wider Morden Town Centre Area <u>Morden Town Centre</u> , the tram and the underground.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	184	5.1.32	The introduction of higher density development <u>and tall buildings</u> (AM5.26) within in the Wider Morden Town Centre Area and in particular within the Morden Regeneration Zone, will...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	185	5.1.33	Tall buildings that meet the requirements in policy D5 <u>12.6</u> (AM5.27), are considered appropriate as part of the regeneration <u>to deliver optimised residential development on and intensified use of</u> (AM5.19) 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.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM3.1	185	5.1.34	<u>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'.</u> The scale of existing buildings...	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM5.1	185	5.1.34	The scale of existing buildings with <u>in</u> (AM5.28) the suburban Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area , is predominantly two storeys in height and therefore ...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	185	5.1.36	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.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	187	5.1.46	As this site is located within the Wider Morden Town Centre Area, there <u>There</u> may be an opportunity to relocate the health centre elsewhere...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	188	5.1.50	Development at the perimeter of the Morden Regeneration Zone and the Wider Morden Town Centre Area are to be respectful of these sensitive edges, to ensure neighbouring occupiers are not unduly adversely affected, and that green and blue infrastructure links and active travel links are enhanced.	See above - initial MM5.1 at Page 173	November 2021 – for submission

MM5.2	202	Site Allocation Mo4, Site deliverability	Commencement within 5-10 years and delivery in phases within <u>the 5-10 and 10-15 years periods.</u>	To ensure that the site allocation is 'justified' and based on current evidence of the lack of funding and the land being 'developable'.	November 2021 – for submission
MM5.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 4	A range of appropriate public spaces and streets <u>within the Morden Regeneration Zone(AM5.6)</u> that enhance accessibility <u>through the Wider Morden Town Centre Area to the surrounding area,</u> with pedestrians and cyclists as the priority.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 5	...the creation of green links through the Wider Morden Town Centre Area <u>Morden Regeneration Zone,</u> ...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM3.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 6	The use of tall buildings where appropriate <u>and in accordance with the Strategic Heights Diagram for the Morden Regeneration Zone(MM5.2)</u> in order to optimise development that relates well to the surrounding context and public realm, particularly at street level.	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM5.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: text	While the Morden Regeneration Zone is an individual site allocation, there are also other development opportunities <u>in the Wider Morden Town Centre Area within its proximity,</u> including the following site allocations:...	See above - initial MM5.1 at Page 173	November 2021 – for submission

MM3.1	202	Site Allocation Mo4, Design and accessibility guidance: text	In accordance with <u>the Strategic Heights Diagram for the Morden Regeneration Zone a plan-led approach</u> , taller buildings would be acceptable in this town centre site, to	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM3.1	204	Site Allocation Mo4, Approach to tall buildings	<u>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</u> subject to consideration of impacts on existing character, heritage and townscape <u>in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' part of a plan-led approach, which could take the form of a masterplan, supplementary planning document or an outline planning application.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM3.1	233	Site allocation 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 <u>up to 15 storeys subject to consideration of design policies.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors' preliminary matters
MM3.1	267	Wimbledon: Policy N9.1, new part between (d) and (e.)	<u>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</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3 In March 2022 reference to the FutureWimbledon SPD was removed from this modification to address the Inspectors' Preliminary Questions letter paragraphs 37-40	November 2021 – for submission March 2022 – response to Inspectors' preliminary matters
MM9.1	268	Wimbledon: Policy N9.1, part j.	Securing <u>improvements to public transport and (AM9.2)</u> investment in Wimbledon station to improve the passenger experience <u>and reduce severance with new bridges over the railway.</u> Any proposals for Wimbledon Station should provide links to	Main modification to make the plan effective and	November 2021 – for submission


			neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.	deliverable by removing reference to new bridges over the railway as this would need to be enabled by Crossrail2 which is unlikely to occur in the plan period.	
MM9.2	268	Wimbledon Policy N9.1, new part after j	<u>Creating a more pleasant environment for shopping and leisure activities in by reducing traffic dominance and managing delivery and servicing needs in a safe, efficient and sustainable way, including through exploring the use of freight consolidation and last mile delivery solutions.</u>	New part added to ensure that the policy is consistent with national policy and to ensure the delivery of sustainable development, and to clarify that the transport strategy for Wimbledon will include reducing traffic dominance and managing deliveries and servicing. This will address matters raised in the submissions received from Love Wimbledon and Merton Residents Transport Group.	November 2021 – for submission
MM9.1	317	Site allocation Wi16	Development proposals must provide links and access to Wimbledon Station and nearby bus stops, which surround the site. They must also look to facilitate a potential road bridge linking Queen's Road and Alexandra Road to the rear of the site.	See above –Initial MM9.1 at Page 268 Plan Ref. Policy N9.1, part j.	November 2021 – for submission
MM11.1	333	H11.1	<u>Strategic</u> policy H11.1 Housing Choice	To comply with NPPF para 20(a) - in response to	March 2022 – response to Inspectors'

				Inspectors' Preliminary Matters question (d) March 2022	preliminary matters
MM1.1	333	H11.1	(e.) Aim for the strategic target of 50% of new homes built in Merton between 2022/ 23 -2036/ 37 to be affordable.	See above - initial MM1.1 at Page 14	March 2022 – response to Inspectors' preliminary matters
MM11.1	346	H11.2	<u>Strategic</u> policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors' preliminary matters
MM1.1	346	H11.2	We will aim to deliver a minimum of 41,732 <u>11,374</u> additional homes for the period 2022/23 - 2036/37 <u>2021/22 – 2035/36</u> .	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors' preliminary matters
MM1.1	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 41,732 <u>11,374</u> additional homes for the period 2021/22 – 2035/36 <u>2022/23 – 2036/37</u> will come forward in Merton by:	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors' preliminary matters

MM1.1	347	Supporting new paragraph after 11.2.4	<u>The SHLAA 2017 findings indicates 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 2036/37 increases to 548 homes per annum.</u>	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors' preliminary matters																																	
MM1.1	348	11.2.5	In accordance with the London Plan requirements and in consultation with and endorsed by the GLA, the housing trajectory set out in Figure 4.2.1 demonstrates how Merton's housing target will be met for the Local Plan period <u>2022/23 – 2036/37</u> 2021/22 – 2035/36 using a stepped housing delivery target.	See above - initial MM1.1 at Page 14	In response to Inspectors preliminary letter, March 2022																																	
MM1	348	11.2.7 and Figure 4.2.2	As Figure 11.2.2 below indicates Merton's annual housing target will be set at <u>775 700</u> homes per annum for the period <u>2022/23 2024/22, increasing to 950 for the period 2025 /26 – 2027/28 2023/24</u> , and then increase to <u>1,080 1,555</u> for 2028/29 the period 2024/25- 2026/27, then further increase to 1,350 for the period 2027/28 –2028/29. This ensures that Merton's Local Plan housing requirement for the Plan period 2022/23 – 2036/37 including the shortfall of 928 new homes is met.	See above - initial MM1.1 at Page 14 Formerly AM11.8. <i>Moved to Main Modifications in response to Inspectors preliminary matters</i>	March 2022 – response to Inspectors' preliminary matters																																	
			<table border="1"> <thead> <tr> <th></th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th><u>Shortfall from 2019/20 and 2020/21</u></th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Merton Local Plan target</td> <td>775</td> <td><u>775</u></td> <td><u>775</u></td> <td><u>700</u></td> <td><u>950</u></td> <td><u>950</u></td> <td><u>950</u></td> <td><u>5</u></td> <td></td> <td><u>6,505</u></td> </tr> <tr> <td>London Plan target</td> <td>1,033</td> <td><u>1,033</u></td> <td><u>1,033</u></td> <td><u>1,033</u></td> <td><u>1,033</u></td> <td><u>1,033</u></td> <td><u>1,033</u></td> <td><u>1,033</u></td> <td><u>928</u></td> <td><u>6,426</u></td> </tr> </tbody> </table>		2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	<u>Shortfall from 2019/20 and 2020/21</u>	Total	Merton Local Plan target	775	<u>775</u>	<u>775</u>	<u>700</u>	<u>950</u>	<u>950</u>	<u>950</u>	<u>5</u>		<u>6,505</u>	London Plan target	1,033	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>928</u>	<u>6,426</u>		
	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	<u>Shortfall from 2019/20 and 2020/21</u>	Total																												
Merton Local Plan target	775	<u>775</u>	<u>775</u>	<u>700</u>	<u>950</u>	<u>950</u>	<u>950</u>	<u>5</u>		<u>6,505</u>																												
London Plan target	1,033	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>1,033</u>	<u>928</u>	<u>6,426</u>																												
MM1.1	348	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 <u>and includes the rolling forward of the small sites target beyond 2029</u> . This sets a target for the	See above - initial MM1.1 at Page 14 Formerly AM11.8. <i>Moved to Main</i>	March 2022 – response to Inspectors' preliminary matters																																	

			<p>period 2029/30 to 2033/34 of 2,370 and for 2034/35 to 2036/37 2035/36 of 1,644 1,096 as indicated in the following table:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Plan period</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>2029/30 - 2033/34</td> <td>2,370</td> </tr> <tr> <td>2034/35 - 2036/37 2035/36</td> <td>1,644 1,096</td> </tr> <tr> <td>2029/30 - 2036/37 2035/36</td> <td>4,014 3,466</td> </tr> <tr> <td>Total</td> <td></td> </tr> </tbody> </table>	Plan period	Target	2029/30 - 2033/34	2,370	2034/35 - 2036/37 2035/36	1,644 1,096	2029/30 - 2036/37 2035/36	4,014 3,466	Total		<i>Modifications in response to Inspectors preliminary matters</i>	preliminary matters
Plan period	Target														
2029/30 - 2033/34	2,370														
2034/35 - 2036/37 2035/36	1,644 1,096														
2029/30 - 2036/37 2035/36	4,014 3,466														
Total															
MM1.1	349	Figure 4.2.1	<i>Figure 11.2.1 'Merton Housing Trajectory 2022/23 – 2036/37' updated – refer to Appendix 2</i>	See above - initial MM1.1 at Page 14 Formerly AM11.10. Moved to Main Modifications in response to Inspectors preliminary matters	March 2022 – response to Inspectors' preliminary matters										
MM2.2	390	Policy 12.1.g	Conserve and enhance Merton's heritage assets and distinctive character using Merton specific guidance, such as Merton's Borough Character Study and Conservation Area Appraisals.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters										
MM2.2	396	Policy 12.2.q	Prioritise pedestrians and cyclists and encourage greater walking and cycling for all around the area in accordance with Transport for London (TfL) Healthy Streets Approach.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters										
MM2.2	400	Supporting text: Additional point added after 12.2.9	<u>12.2.10 Transport for London's (TfL) Healthy Streets Approach provides information and guidance on how best to prioritise walking and cycling.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters										

MM2.1	402	12.5 a(i)	Principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, the London Plan, and Historic England guidance;	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.2	404	Policy 12.3.s	Provide well-designed cycle parking in accordance with London Plan minimum standards and TfL's London Cycle Design Standards that is well integrated with the overall design approach of the development and does not negatively impact on the primary street elevation.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	404	Policy 12.3.u	Ensure that the design and management of facilities for recycling, storage and disposal of household waste is designed to ensure efficient and effective waste collection, is well designed and is considered as in accordance with Merton's Waste and Recycling Storage Requirements and is part of the overall design approach and does not adversely affect the primary building function, appearance of the building and character of the street.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	408	Supporting text: Additional point after 12.3.7	<u>12.3.8 TfL's London Cycle Design Standards provides requirements and advice for the design of dedicated cycle infrastructure.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	410	Supporting text: Additional point after 12.3.15	<u>12.3.16 Merton's Waste and Recycling Storage Requirements sets out guidance on the siting and design of waste and recycling facilities so that waste collection services in Merton can efficiently collect and dispose of household and other waste and recycling.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters

MM3.1	410	Policy D12.6 Tall Buildings	<p>Diagram to be added at the end of the policy text: <u>Strategic Heights Diagram, Wimbledon town centre</u></p> 	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM12.8	419	Policy 12.5.a	<p>Development proposals affecting a heritage asset or its setting will be required to be in accordance with the following criteria: i. principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the</p>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b (for guidance) and also	March 2022 – response to Inspectors’ preliminary matters

			<p>accompanying Historic Environment Planning Practice Guide, and the London Plan, and Historic England guidance;</p> <p>ii. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.</p>	initial MM2.1 at Page 35 Plan Ref. 2.1.1 (for NPPF)	
MM2.2	422	Supporting text: Additional point after 12.5.2	<p><u>12.5.3 Historic England provides detailed guidance on best practice approaches when working with heritage assets. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study also provide borough specific guidance when working with heritage assets.</u></p>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	426	Policy 12.6.1.b	<p><u>Wimbledon town centre, as set out within the chapter on Wimbledon and the Future Wimbledon supplementary planning document.</u></p>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	427	Policy 12.6.2.k	They are informed by <u>have had regard to</u> the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.1	431	Para 13.1.1	The NPPF 2019 and 2021 draft states that planning policies...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.2	440	Policy 12.9.e	Shop-fronts must be of a high quality and well-proportioned and designed and should be designed in accordance with the council's Shopfront Supplementary Planning Document 2017.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	441	Supporting text 12.9.1	Shop-fronts have a huge impact on the appearance of individual buildings and parades of shops. <u>Merton's Shopfront SPD provides best practice design approaches for design and should be used when designing shop fronts.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters

MM2.1	443	13.2.16	...in line with the “Agent of Change” approach in the NPPF 2021 2019 and in the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	443	13.3.2	The NPPF 2021 2019 paragraphs 8, 20 and 81 0 -91 2 , the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	456	13.5.2	The NPPF 2019 (and 2021 consultation draft) makes clear that local authorities should definte <u>define</u> the extent of the Primary Shipping Area and the town centre boundary. These are available on Merton’s Policies Map for each town centre.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	456	13.5.4	The NPPF 2021 2019 and associated NPPG promotes	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.1	... the NPPF 2021-2019 (paras 86 0-91 0)...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.2	The NPPF 2021 2019 and the London Plan support the “town centres first” approach...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.4	As set out in the NPPF 2019 (and the 2021 draft) the Primary Shopping Area...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.5	In accordance with the National Planning Policy Framework 2019 (NPPF 2021 paragraph 90 , impact assessments will be required	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters

MM2.1	471	13.8.1	The NPPF 2021 2019 , the London Plan and Merton's strategic policies...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.1	490	14.2.5	Sports and leisure facilities (including Playing Pitches), should be tested against paragraph 97 99 of the NPPF and considered against the requirements of London Plan Policy S5. ...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	First published in Document 0D4b Additional modifications in November 2021 for submission March 2022 – response to Inspectors' preliminary matters
MM15.1	511	Policy O15.3 (d)	Require development to contribute to net gains in B biodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links. <u>Where development is adjacent to or includes a river, natural banks must be restored with a 10m buffer included.</u>	Agreed with the Environment Agency in Statement of Common Ground. Added as AM15.6	November 2021 – submission (added as AM15.6)
MM16.1	562	Para 16.1.2	As set out in t The Mayor's Transport Strategy <u>and the Government's Decarbonising Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce set out the overarching policy framework and strategic approach to transport which focuses on reducing</u> dependency on cars in favour of active, efficient and sustainable modes of travel.	Additional reference to newly published Decarbonising Strategy and associated wording amendment.	
MM16.2	565	T16.2d	Provide secure, covered <u>and well-designed</u> cycle parking <u>facilities that meet or exceed London Plan standards (higher level minimum requirements) in accordance with London Plan minimum standards (higher level) and London Cycle Design Standards.</u>	November 21 Amendment made as proposed by TfL Spatial Planning and to ensure consistency with	November 21 Amendment made as proposed by TfL Spatial Planning and

				London Plan policy T5 A 2 which states that “Developments should provide cycle parking at least in accordance with the minimum standards.”	to ensure consistency with London Plan policy T5 A2 March 22. Response to Inspectors preliminary matters
MM2.2	571	T16.4d	Disabled <u>persons</u> ’ parking should be provided in accordance with London Plan standards and should <u>have regard to meet</u> design guidelines, be accommodated within the development site <u>where possible</u> and be provided with electric vehicle charge points.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	
MM16.3	577 /578	16.4.8	The Government <u>has published a decarbonising transport strategy which includes proposals to increase the uptake of electric vehicles (EVs) and end the sale of new petrol and diesel cars by 2030. are progressing a strategy to significantly increase the uptake of electric vehicles (EVs) over the coming decades and confirmed in November 2020 that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned.</u>	Supporting text amended and updated to include reference to the Government’s recently published <u>decarbonising transport strategy</u> .	November 2021 for submission – was previously AM16.23
MM16.4	578	16.4.15	<u>For developments that comprise of a mix of dedicated private parking spaces and communal parking, the London Plan requirement for 20% active EV provision should be fully applied to any communal parking facilities. Developers should also refer to Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles (publishing.service.gov.uk) that may also be applicable to the development.</u>	Sentence added to provide clarity in relation to application of the London Plan standard for the provision of EV charge points for mixed developments. This is in response to newly published Government proposals for building regulation	March 2022

				to require all new dwellings with dedicated parking space to have a charge point installed. For developments comprising a mix of units with communal parking and houses with private driveways, there is concern that a development could attempt to meet both the building regs requirement and the London Plan 20% standard by allocating charge points first to units with private parking and thus leaving communal parking facilities with no or inadequate EV charging provision.	
MM18.1	After page 583	After the Appendices title page, insert a new initial appendix	[See appendix 4 to this Schedule of Main Modifications]	To improve clarity regarding which adopted policies are superseded by the Local Plan and to ensure the effectiveness and regulatory compliance of the Local Plan.	March 2022 – response to Inspectors' preliminary matters

MM-MOL Map-01b	Map	Policies Map – Metropolitan Open Land	<i>Slight boundary amendments around the Eveline Day Nursery SW20 9NA from Lower Morden Metropolitan Open Land (MOL-3).</i>	<p>Corrections to the MOL boundary have been made to fix a GIS error from the Stage 3 maps where the MOL boundary did not align with the property boundaries. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to maps Appendix 1 for details</p>	November 2021 – for submission
MM-Open Space Map-02	Map	Policies Map – Open Space	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Merton and Sutton Joint Cemetery Surrounds Open Space (M074).</i>	<p>This site contains 4 residential properties which do not form part of the adjoining cemetery. They do not meet the Open Space criteria set out in the Merton Green Infrastructure Study 2020. Officers consider that their inclusion in the Open Space designation is an anomaly and they should be removed. The modifications ensure that the Local Plan is 'justified'.</p>	November 2021 – for submission

				Refer to map Appendix 1 for details.	
MM-Open Space Map-03	Map	Policies Map – Open Space	<i>Remove part of Tooting and Mitcham Imperial Sports Ground from Open Space (P028), in accordance with approved planning application 19/P4094.</i>	<p>In accordance with approved Planning Application 19/P4094. This is to align with the amendment made to the MOL boundary, as per the Stage 3 Policy maps. The site was reviewed by officers prior to Stage 3 consultation, however it was left off the published map in error. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map in Appendix 1 for details.</p>	November 2021 – for submission
MM-Open Space Map-04	Map	Policies Map – Open Space	<i>Remove part of the Eastfields estate site owned by Clarion Housing Group from Streatham Park Cemetery Open Space (C004).</i>	<p>In accordance with approved Planning Application 19/P4094. This is to align with the approved planning application 17/P1717. This change was highlighted by Clarion Housing Group through</p>	November 2021 – for submission

				<p>their response to the Stage 3 Local Plan consultation. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-Open Space Map-04	Map	Policies Map – Open Space	<i>Remove part of the Long Bolstead Recreation Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).</i>	<p>In accordance with approved Planning Application 19/P4094. This is to align with the approved planning application 17/P1717. This change was identified by officers following the Clarion Housing Group response to the Stage 3 Local Plan consultation. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	November 2021 – for submission
MM-SINC Map-05	Map	Policies Map – Sites of Importance for Nature	<i>Wimbledon Park SINC (MeBI02) - An additional area of land needs to be included in this SINC as the land contains a number of veteran trees and other wildlife interest.</i>	<p>Reviewed following Stage 3 Local Plan response (D .Dawson) and confirmed by</p>	November 2021 – for submission

		Conservation		<p>Martin Boyle (LBM Greenspaces team).</p> <p>As part of the recent Wimbledon Park Lake project this land has been extensively surveyed and it holds nature conservation interest in line with the SINC designation. It is considered that the site was excluded in error.</p> <p>This change was identified through a Stage 3 Local Plan consultation response and has been confirmed with the Council's Ecologist.</p> <p>The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-SINC Map -06	Map	Policies Map – Sites of Importance for Nature Conservation	<i>Myrna Close SINC (MeBII10) - The SINC boundary needs to be amended in accordance with approved planning application 16/P3430.</i>	In accordance with approved Planning Application 16/P3430 to reflect the residential properties that have been built and the new	November 2021 – for submission

				<p>ecology area created on site. The site was reviewed by officers prior to Stage 2a consultation, however it was left off the published map in error. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-Green Corridor Map-07	Map	Policies Map – Green Corridor	<i>Ridge Road to Wimbledon Park Green Corridor (GC19) - The Green Corridor boundary needs to be amended to remove part of the Thames Water site at Byegrove Road, Colliers Wood.</i>	<p>In discussions with Thames Water officers agree that this part of the site does not meet the Green Corridor criteria and therefore should be removed from the Policies Map. Up to date site photos were provided by Thames Water following the Stage 3 submission. The modifications ensure that the Local Plan is 'justified'.</p>	November 2021 – for submission

				Refer to map Appendix 1 for details.	
MM-APZs-Map-08	Map	Policies Map – Archaeological Priority Zones	<i>Removed the map showing Archaeological Priority Zones from the Policies Map.</i>	For accuracy and to ensure that the Local Plan is 'justified', this data has been removed because it has been superseded by Archaeological Priority Areas according to the latest information from Historic England. Refer to map Appendix 1 for details.	November 2021 – for submission
MM-Conservation Areas-Map-09	Map	Policies Map Conservation Areas	<i>Added labels to the map showing the Conservation Area codes and also a table below the legend with the name of each of the Conservation Areas</i>	For clarity and to ensure the Local Plan is "justified", the Conservation Areas map has been labelled. Refer to map Appendix 1 for details.	November 2021 – for submission

MM-Listed Buildings-Map-10	Map	Policies Map Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Historic England. This modification ensures that the Local Plan is “justified”	November 2021 – for submission
MM- Locally Listed Buildings-Map-11	Map	Policies Map Locally Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Merton Council. This modification ensures that the Local Plan is “justified”. Refer to map Appendix 1 for details.	November 2021 – for submission
MM-Wandle Cycle Route-Map-12	Map	Policies Map Wandle Cycle Route	<i>New map to highlight the cycle routes that are part of the Wandle Trail</i>	For clarity the cycle network that is part of the Wandle Trail has been added as a separate map to highlight its importance in enabling active travel choices. This change was requested at the Stage 3 consultation from the Wandle Valley Forum.	November 2021 – for submission

				Refer to map Appendix 1 for details.	
MM-Merton-Cycle Network-Map13	Map	Policies Map New map	<i>Cycle network routes have been updated to show the Wandle Missing Link</i>	For accuracy and to ensure that the Local Plan is 'justified', the cycle network map has been updated to reflect the latest agreement on the Wandle Missing Link on the borough boundary between Merton and Wandsworth. Refer to map Appendix 1 for details.	November 2021 – for submission
MM19.1	After page 665	Insert new policy M19.1 Monitoring	<i>Refer to Appendix 3 for new policy wording</i>	To improve clarity of the proposed monitoring arrangements that will gauge the effectiveness of the policies and will help to inform the Local Plan review process, and therefore ensure the overall soundness of the Local Plan.	March 2022 – response to Inspectors' preliminary matters



MM-MOL-Map-01b



- MOL Stage 3
- MOL Submission

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



**MM-Open Space-
Map-02**

- Open Space Stage 3
- Open Space Submission



Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



MM-Open Space- Map-03



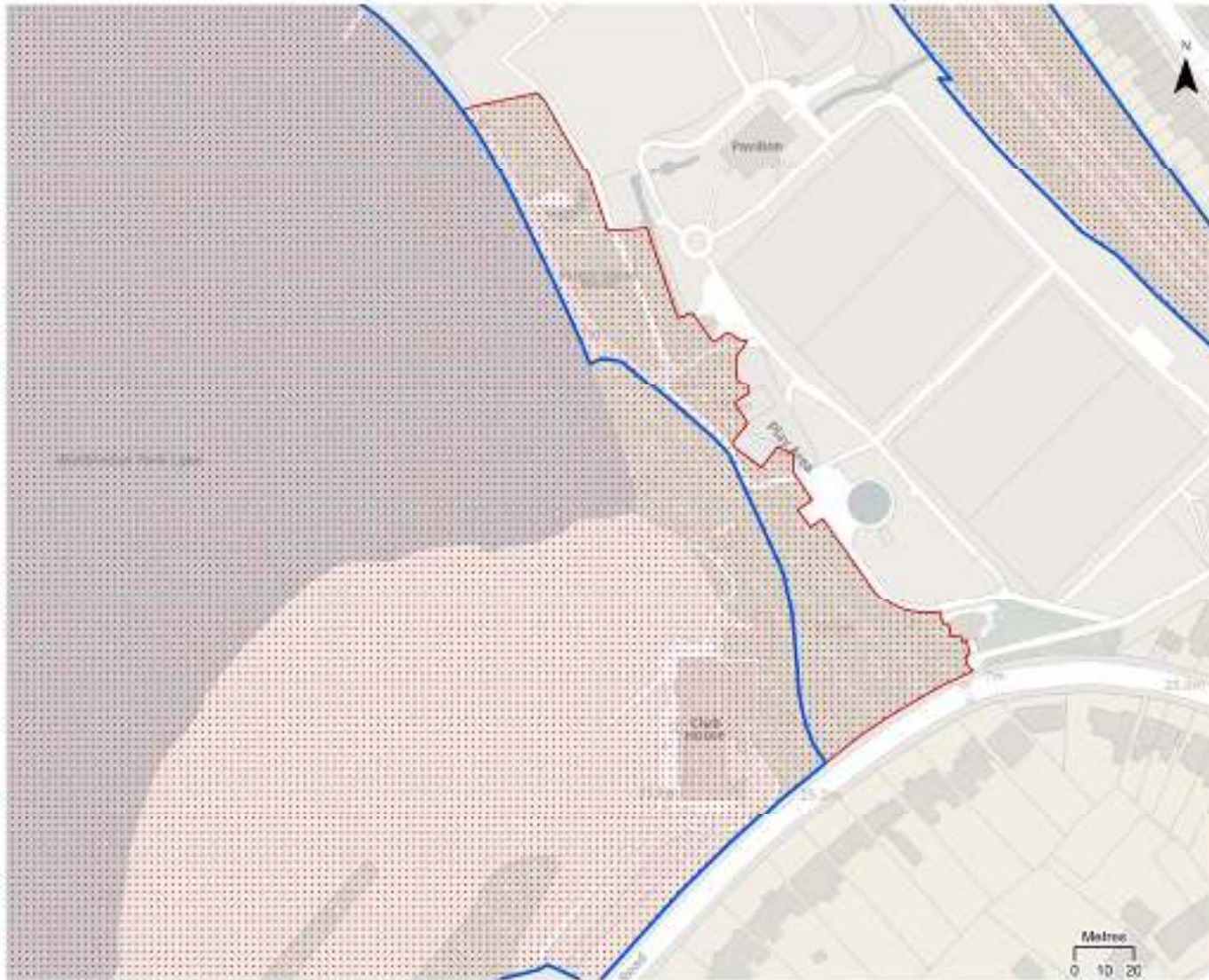
- Open Space Stage 3
- Open Space Submission



Contains OS data © Crown copyright [and database rights] (2011) OS (100019259)





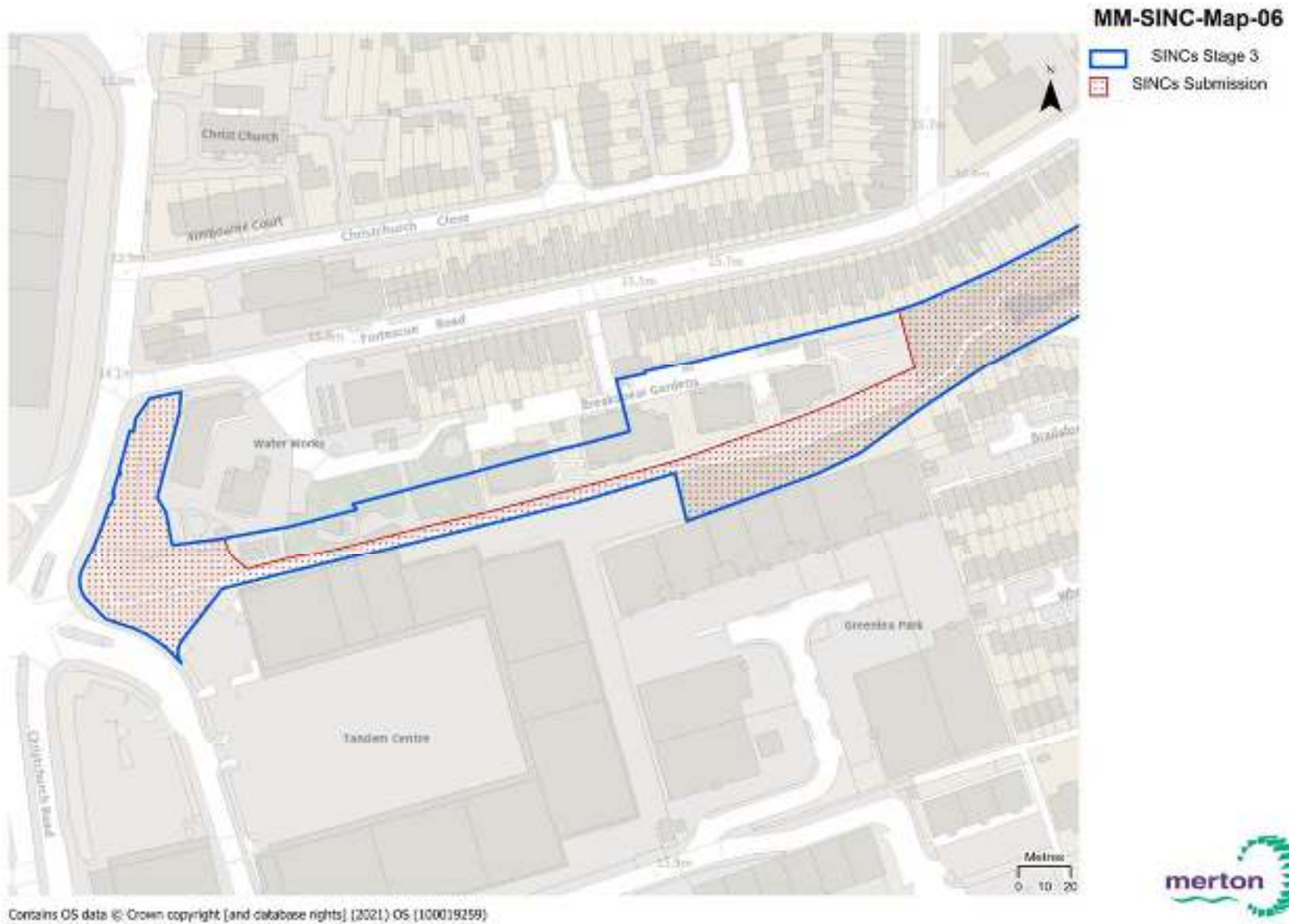
MM-SINC-Map-05



-  SINCs Stage 3
-  SINCs Submission

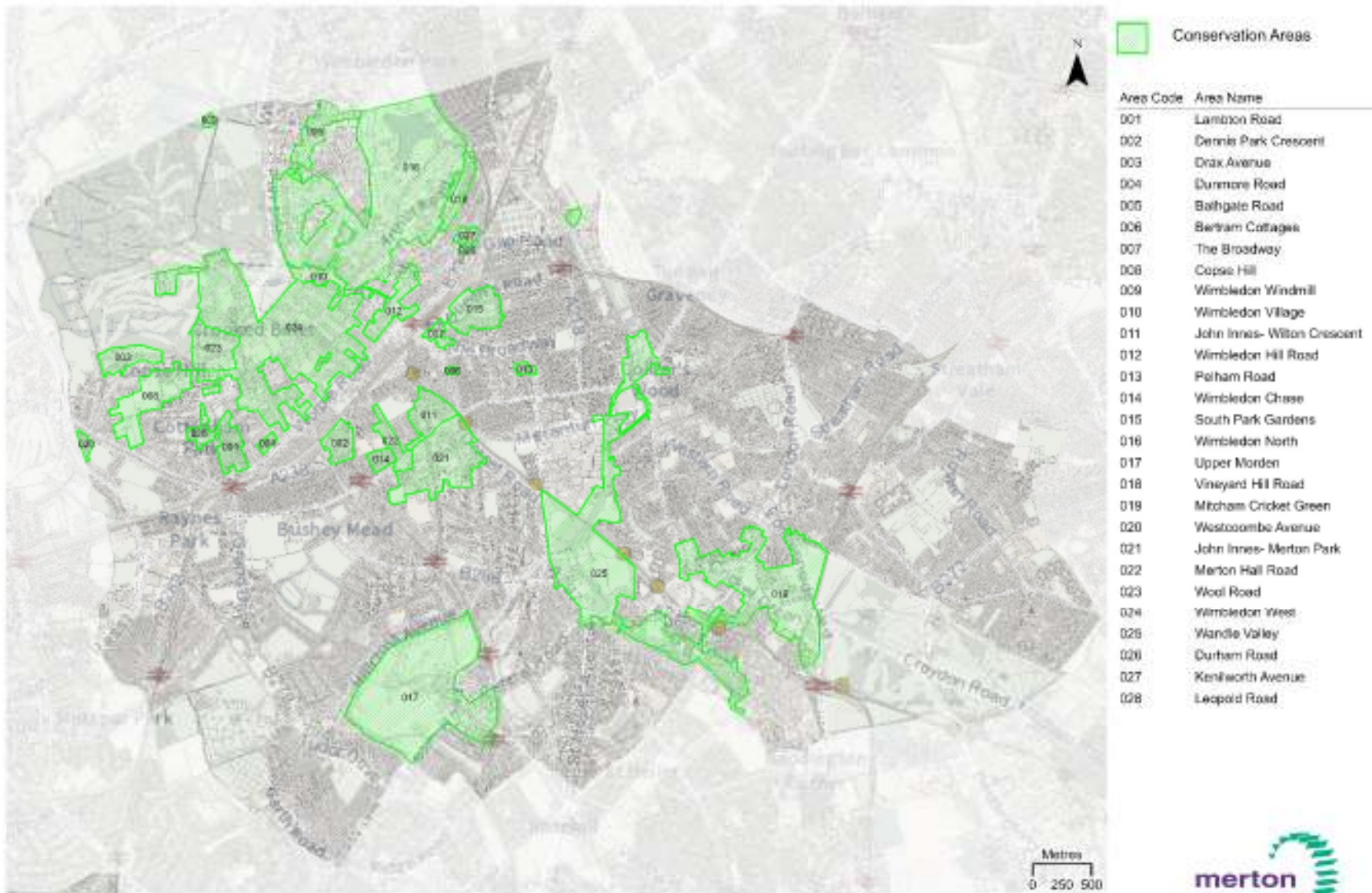
Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)





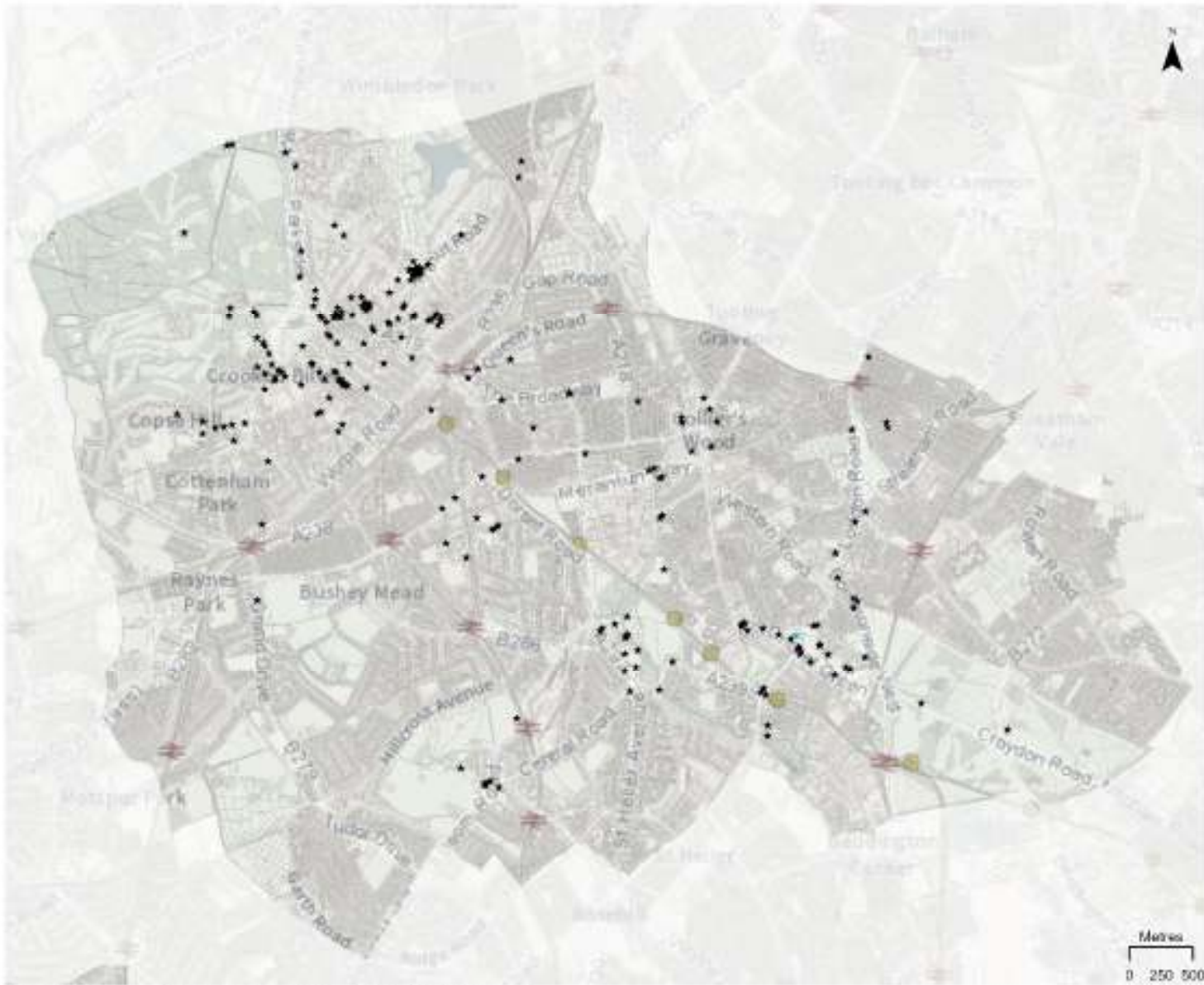


MM-Conservation Areas-Map-09



Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)

MM-Listed Buildings-Map-10



★ Listed Buildings

Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)



MM-Locally Listed Buildings-Map-11

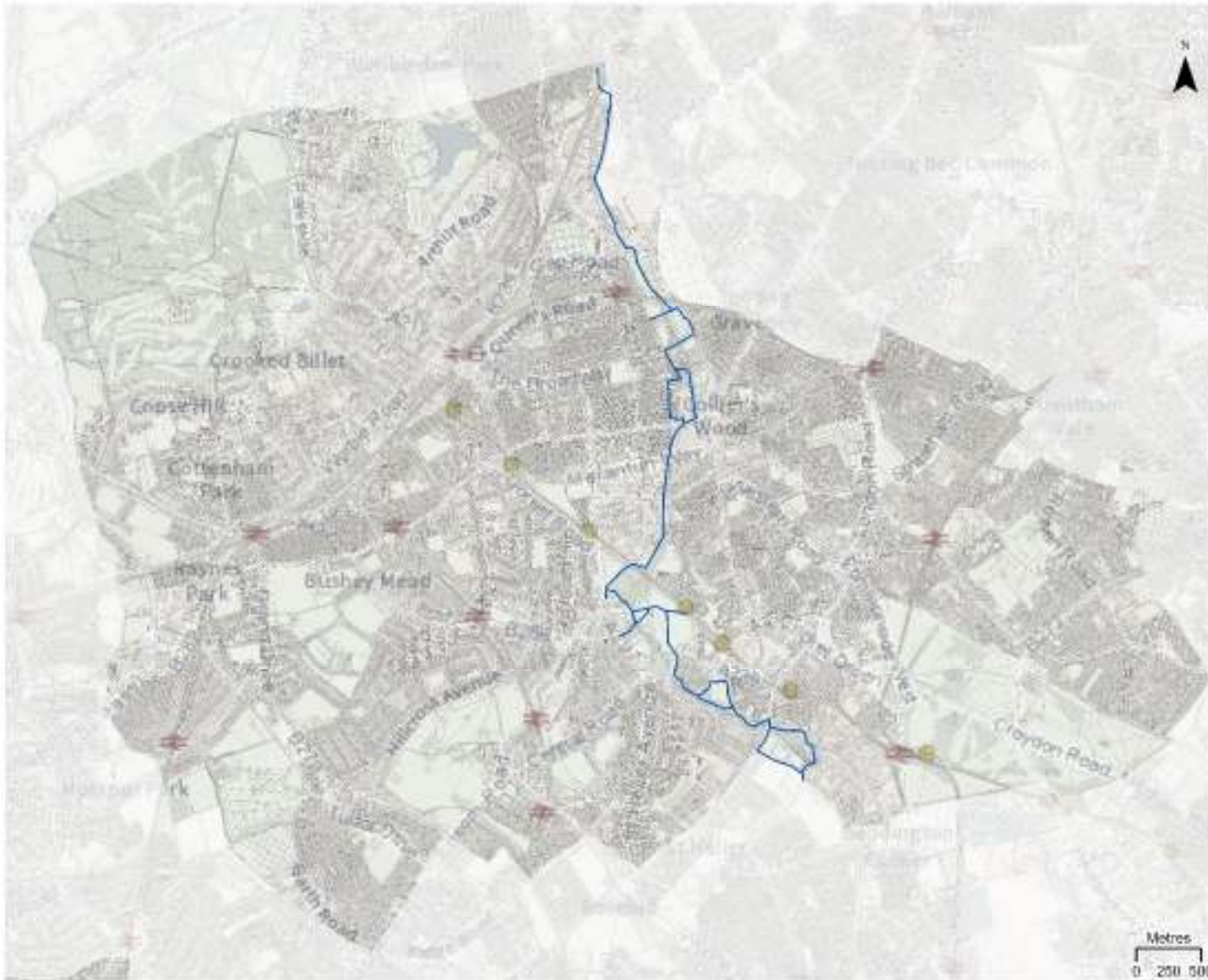
● Locally Listed Buildings



Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



MM-Wandle Cycle Route- Map-12

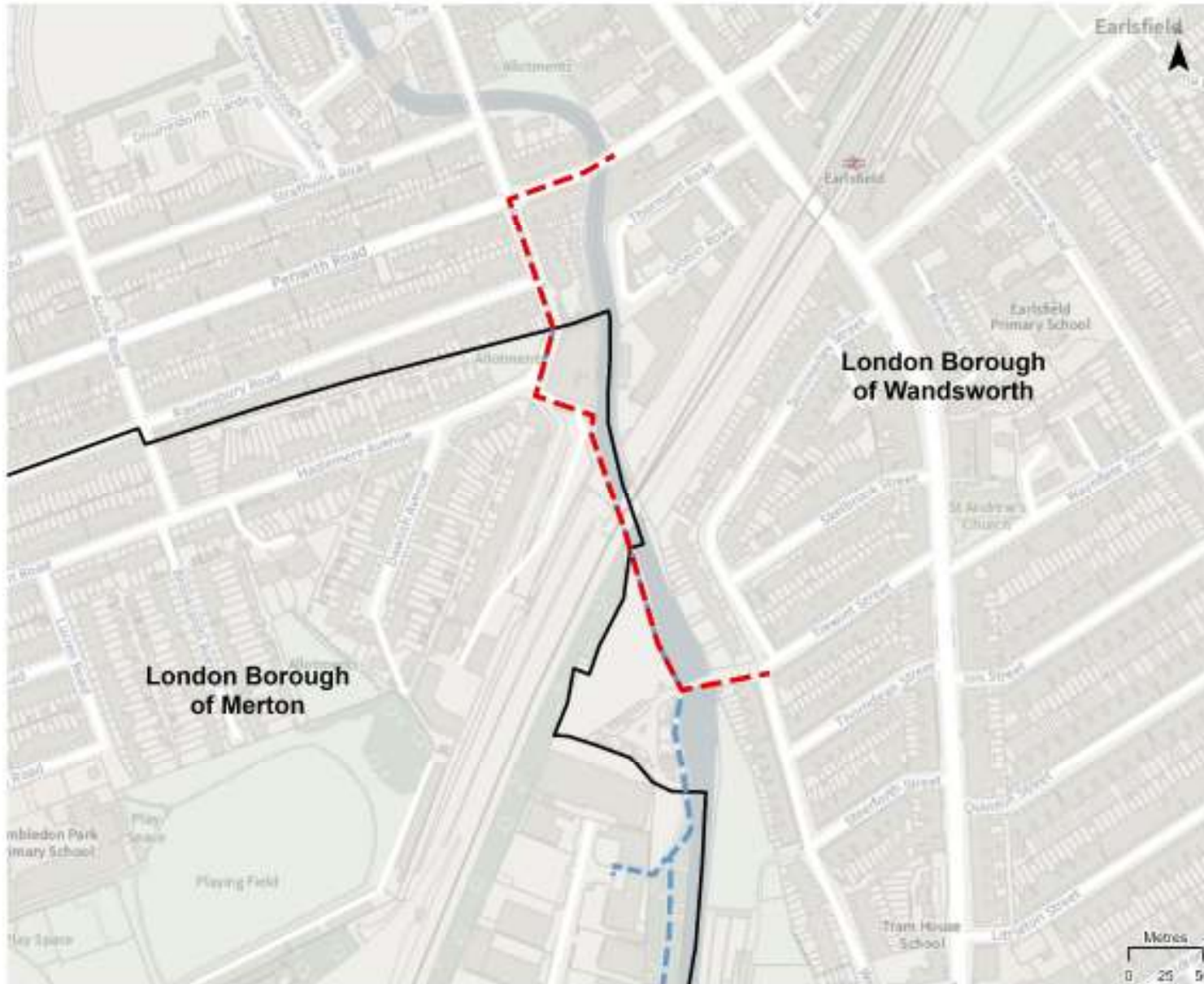


— Wandle Cycle Route

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



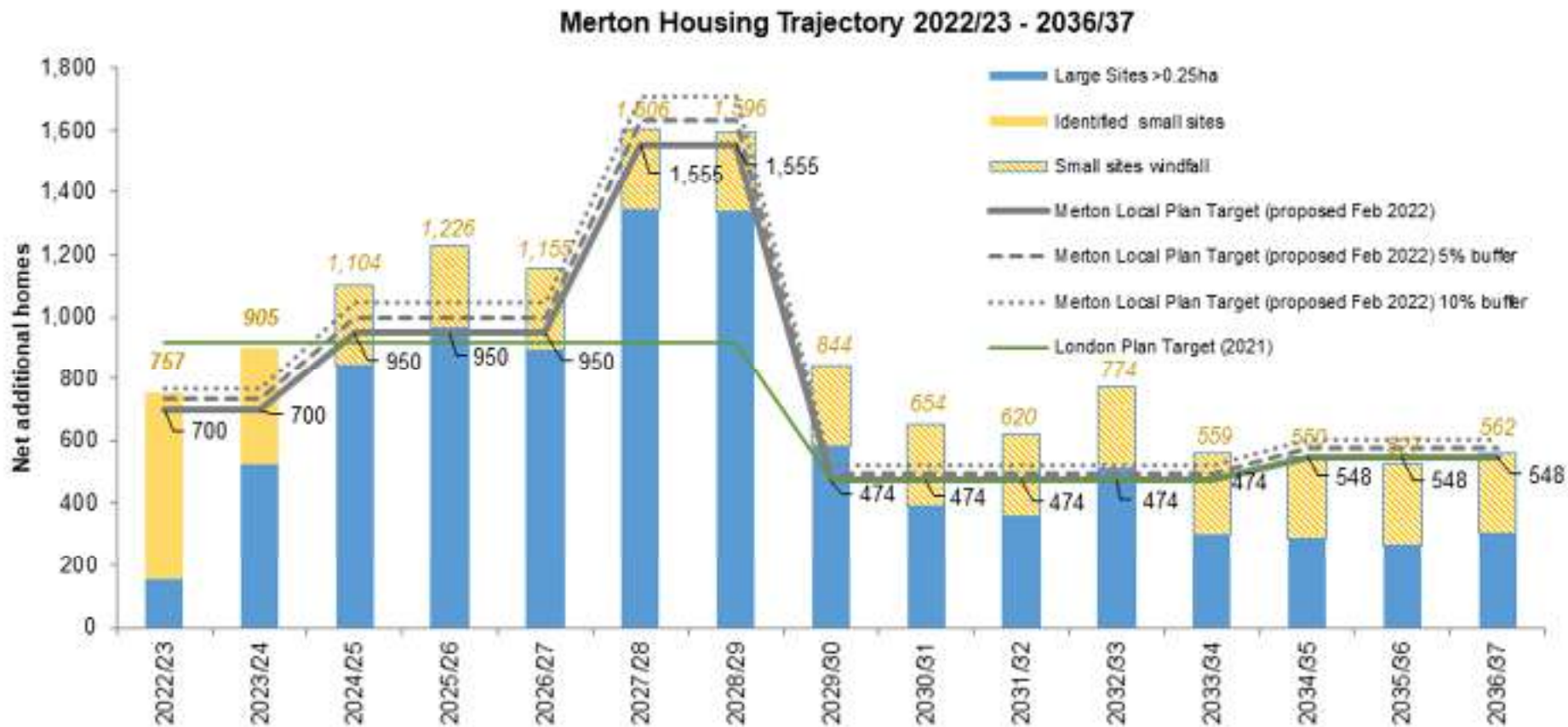
MM-Merton-Cycle Network-Map13



- Merton Cycle Network
- Wandle Missing Link
- Merton Borough Boundary

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)





Appendix 3 – after page 665 (MM19.1) new Policy

19. MONITORING

Policy M19.1 Monitoring

Merton Council will demonstrate the delivery of the Local Plan's spatial vision and strategic objectives by regularly monitoring the implementation of policies.

In the event that delivery falls significantly below what is required to achieve the necessary targets, the council will trigger a full or partial review of the plan in order to address the reasons for under-delivery.

Key indicators that may trigger a full or partial review are:

- A failure to demonstrate a 5-year housing land supply in any two successive monitoring years and the two monitoring years following that indicating no potential for recovery.
- Housing completions fall more than 20% beneath the targets in the housing trajectory over any rolling 3-year period.

Supporting text

19.1.1 Monitoring the Local Plan is crucial to the successful delivery of its vision and strategic objectives.

19.1.2 Section 113 of the Localism Act 2011 sets out the requirements for Authority Monitoring Reports (AMRs). Regulation 34 of The Town and Country Planning (Local Planning) (England) Regulations 2012 provides further detail on these requirements which are also reflected in the National Planning Practice Guidance (NPPG) on Local Plans.

19.1.3 Monitoring is required to ensure that the policies are relevant and effective. Monitoring allows us to understand whether policies have worked as they were intended.

19.1.4 Currently, the council has no reason to believe that the plan will not be implemented in full. However, the council accepts that there could be circumstances where development fails to come forward for a number of reasons, some of which are beyond the control of the council. These could include delivery challenges on a site or a more general slowdown in the economy and its ability to deliver viable development. Where the council can use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

Local Plan monitoring framework

19.1.5 The monitoring framework sets out the monitoring indicators for the Local Plan, which will be reported in the AMR. The AMR is not the only monitoring tool. There are separate monitoring arrangements of other related strategies, for example, the climate change strategy and action plan, and the South London Waste Plan. The monitoring framework below relates to the performance of this Local Plan.

19.1.6 Regular monitoring will include analysis of delivery data and trends. Taking account of changes in legislation at the regional and national level. Reviewing the plan’s supporting evidence base where necessary. If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to a full or partial review of the Local Plan and its policies.

Reviewing the plan

19.1.7 As required by the NPPF and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council will initiate a review of the plan within five years of adoption.

Local Plan monitoring framework		
Thematic area	Monitoring indicator	Target (if applicable)
<u>Growth Area (Opportunity area)</u>	<u>London Plan indicative target (up to 2041) to deliver 5,000 new homes and 6,000 jobs (indicative figure).</u>	<u>Cumulative housing completions since OA designation.</u> <u>Cumulative non-residential floorspace approvals and completions since OA designation.</u>
<u>Air quality</u> <u>To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</u>	<u>Number of days p.a. when air pollution is moderate or high for PM10*</u> <u>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre - more than 35 times a year at any measuring site.</u>	<u>Decreasing number of days of high PM10 over a 3-year period.</u>
<u>Biodiversity</u> <u>To protect and conserve Merton’s biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding</u>	<u>Changes in areas of biodiversity importance.</u>	<u>No net loss of sites of importance for nature conservation (SINCS).</u>

<u>to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</u>		
<u>Land and soil condition and pollutants</u> <u>To conserve Merton's geodiversity and protect soils from development and over intensive use.</u>	<u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u>	<u>No planning permissions granted contrary to Environment Agency advice on flood risk and water quality grounds.</u>
<u>Sustainable land use</u> <u>To make the best and most efficient use of land to support sustainable patterns and forms of development.</u>	<u>Planning permissions granted and completed.</u>	<u>95% of major planning permissions started within a 3 year period.</u>
<u>Heritage (including architectural and archaeological heritage)</u> <u>To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.</u>	<u>Number of heritage assets on Historic England's Heritage at Risk Register.</u>	<u>A reduction in the number of heritage assets on the Heritage at Risk register.</u>
<u>Flood risk management</u> <u>To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</u>	<u>Number of planning permissions granted contrary to Environment Agency advice.</u> <u>Number and location of Environment Agency flood warnings issued across Merton each year.</u>	<u>No planning permissions granted contrary to Environment Agency advice.</u>
<u>Climate change</u> <u>To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</u>	<u>Reduction in carbon emissions from new build developments.</u> <u>Reporting on carbon offsetting proposed where on site reduction is not achievable.</u>	<u>Year on year decrease in carbon emissions from new development.</u> <u>Reporting on carbon offsetting in Infrastructure Funding Statement.</u>
<u>Noise and vibration</u> <u>To minimise noise, vibration levels and disruption to</u>	<u>An increase in area of the Noise Action planning important areas.</u>	<u>No increase to area.</u>

<u>people and communities.</u>		
<p><u>Water quality</u></p> <p><u>To protect and enhance Merton's water bodies.</u></p>	<p><u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u></p> <p><u>River water bodies classified under the Water Framework Directive to achieve good ecological status.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p> <p><u>No decrease of the Water Framework Directive classification of 'good' ecological status.</u></p>
<p><u>Water consumption</u></p> <p><u>Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</u></p>	<p><u>Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.</u></p> <p><u>Number and location of water pollution incidents reported to the Environment Agency across Merton annually.</u></p> <p><u>Water quality status of water bodies across borough.</u></p> <p><u>Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p>
<p><u>Open space and nature</u></p> <p><u>To protect, connect and enhance Merton's natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</u></p>	<p><u>Net loss of designated open space for development.</u></p> <p><u>Metres of main river improved and restored across Merton.</u></p> <p><u>Biodiversity Net Gain delivered across Merton.</u></p>	<p><u>No net loss of designated open space.</u></p>

<p><u>Sustainable transport</u></p> <p><u>To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</u></p>	<p><u>Overall sustainable mode share.</u></p> <p><u>Uptake of low emission vehicles.</u></p>	<p><u>Increase in overall sustainable mode share based on a rolling three year average.</u></p> <p><u>Increase in registered EV vehicles in Merton – measured annually.</u></p>
<p><u>Energy use</u></p> <p><u>To manage and reduce demand for energy.</u></p>	<p><u>Average percentage improvement over Part L of the Building Regulations.</u></p>	<p><u>Compliance with local plan policy.</u></p>
<p><u>Health and wellbeing</u></p> <p><u>To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</u></p>	<p><u>Delivery of healthcare facilities identified in Merton’s Local Plan.</u></p> <p><u>Number of people taking up physical activities and stating they are in ‘good health.’</u></p> <p><u>Number of Health Impact Assessments (HIA) carried out.</u></p>	<p><u>n/a (Monitoring will be reported in the Health and Wellbeing Strategy annual update known as the Merton Story and added to the AMR.)</u></p> <p><u>All development proposals that meet the Local Plan policy requirements to submit a Health Impact Assessment.</u></p>
<p><u>Housing</u></p> <p><u>To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton’s demographic changes and local housing demand.</u></p>	<p><u>Progress against borough wide affordable housing targets.</u></p> <p><u>Number of homes built each year.</u></p>	<p><u>Building regulation M4(3) – 10% of all new build self-contained homes.</u></p> <p><u>M4(2) – 90% of all new build self-contained homes.</u></p> <p><u>50% of all new homes to be affordable across the plan period.</u></p> <p><u>Of affordable homes, 70% to be low-cost rent 30% to be intermediate tenure.</u></p>

<p><u>Safe environments</u></p> <p><u>To contribute to safe and secure environments for all people including people with Protected Characteristics.</u></p>	<p><u>Number of Health Impact Assessments carried out and type of development.</u></p>	<p><u>Health Impact Assessments carried out for all developments required by policy.</u></p> <p><u>Increase in % of people feeling safe as measured in Merton Residents Survey.</u></p> <p><u>Yearly decrease in serious crime and crime against people with Protected Characteristics.</u></p>
<p><u>Infrastructure</u></p> <p><u>To ensure that environmental, social and physical infrastructure is managed and delivered to support demographic change.</u></p>	<p><u>Delivery of infrastructure projects identified in the Infrastructure Delivery Plan.</u></p>	<p><u>Number of infrastructure projects delivered.</u></p>
<p><u>Design</u></p> <p><u>To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</u></p>	<p><u>Increase in number of major schemes reviewed by the Design Review Panel at pre – application stage.</u></p>	<p><u>% of planning appeals allowed by the Planning Inspector for applications originally refused for design reasons by the council.</u></p>
<p><u>Local employment</u></p> <p><u>To develop and maintain a healthy labour market.</u></p>	<p><u>Number of people unemployed.</u></p> <p><u>Number of new jobs created.</u></p>	<p><u>% of people unemployed lower than regional and national averages.</u></p> <p><u>Increase in number of new jobs created.</u></p>
<p><u>Education and skills</u></p> <p><u>To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.</u></p>	<p><u>Development of floorspace to meet the needs for pupil places.</u></p> <p><u>Number of 16- 24-year-olds in training or apprenticeships or work programmes.</u></p> <p><u>Number of local people employed or in training as part of large or regeneration developments.</u></p>	<p><u>Delivery of necessary education floorspace</u></p> <p><u>Yearly increase in the number of apprenticeships or work programmes.</u></p> <p><u>All major developments to provide local people with employment and/or training opportunities.</u></p>

<p><u>Economic growth and town centres</u></p> <p><u>To increase the vitality and viability of existing town centres, local centres and parades.</u></p>	<p><u>Undertake the shopping survey to measure the retail vacancy rate in Merton's town centres below national and regional rates.</u></p>	<p><u>Maintain the retail vacancy rate below national and regional averages in Merton's town centres.</u></p> <p><u>No net loss of employment floorspace in Strategic Industrial Locations.</u></p>
---	--	---

Core Planning Strategy (2011) policies replaced by the forthcoming Local Plan

<u>Core Planning Strategy policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>Issues and options.</u>	<u>Good growth chapter</u>
<u>Merton's Core Strategy Spatial Vision.</u>	<u>Chapter 01c: Urban development objectives and vision.</u>
<u>Key Diagram (Figure 8.1 Key Diagram).</u>	<u>Figure 1: Merton's spatial strategy.</u>
<u>Policy CS 1 Colliers Wood.</u>	<u>Policy N3.1: Colliers Wood.</u>
<u>Policy CS 2 Mitcham Town Centre.</u>	<u>Policy N4.1 Mitcham.</u>
<u>Policy CS 3 Morden Town Centre.</u>	<u>Policy N5.1; Morden.</u>
<u>Policy CS 4 Raynes Park Local Centre.</u>	<u>Policy N6.1: Raynes Park.</u>
<u>Policy CS 5 Wandle Valley.</u>	<u>Policy O15.6 Wandle Valley Regional Park.</u>
<u>Policy CS 6 Wimbledon Town Centre.</u>	<u>Policy N9.1: Wimbledon.</u>
<u>Policy CS 7 Centres.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 8 Housing Choice.</u>	<u>Strategic Policy H11.1 Housing choice</u>
<u>Policy CS 9 Housing Provision.</u>	<u>Strategic Policy H11.2 Housing provision</u>
<u>Policy CS 10 Accommodation for Gypsies and Travellers.</u>	<u>Policy No. H11.6 Accommodation for Gypsies and Travellers.</u>
<u>Policy CS 11 Infrastructure.</u>	<u>Strategic policy IN 14.1 Infrastructure.</u>
<u>Policy CS 12 Economic Development.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 13 Open space, nature conservation, leisure and culture.</u>	<u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation.</u>
<u>Policy CS 14 Design.</u>	<u>Strategic Policy D12.1 Delivering well-designed and resilient neighbourhoods.</u>
<u>Policy CS 15 Climate Change.</u>	<u>Strategic Policy CC2.1: Promoting Sustainable Design to Mitigate and Adapt to Climate Change.</u>
<u>Policy CS 16 Flood Risk Management.</u>	<u>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage.</u>
<u>Policy CS 17 Waste Management.</u>	<u>Strategic Policy W14.4 Waste Management.</u>
<u>Policy CS 18 Active Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 19 Public Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>

<u>Policy CS 20 Parking, Servicing and Delivery.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Chapter 27 Delivery and Implementation (Delivery of the Spatial Strategy and Core Policies).</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>
<u>Chapter 28 Monitoring Framework.</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>

Sites and Policies Plan (2014) policies replaced by the forthcoming Local Plan

<u>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>DM R1 Location and scale of development in Merton's town centres and neighbourhood parades.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R2 Development of town centre type uses outside town centres.</u>	<u>Policy TC 13.6 Development of town centre type uses outside town centres.</u>
<u>DM R3 Protecting corner/ local shops.</u>	<u>Policy TC13.7 Protecting corner / local shops</u>
<u>DM R4 Protection of shopping facilities within designated shopping frontages.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R5 Food and drink / leisure and entertainment uses.</u>	<u>Policy TC13.8 Food and drink / leisure and entertainment.</u>
<u>DM R6 Culture, arts and tourism development.</u>	<u>Policy TC13.9 Culture, arts and tourism development.</u>
<u>DM R7 Markets.</u>	<u>Policy not taken forward.</u>
<u>DM H1 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>	<u>Policy No. H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>
<u>DM H2 Housing mix.</u>	<u>Policy No. H11.3 Housing mix</u>
<u>DM H3 Support for affordable housing.</u>	<u>Policy No. H11.1 Housing choice</u>
<u>DM H4 Demolition and redevelopment of a single dwelling house.</u>	<u>Policy not taken forward.</u>
<u>DM H5 Student housing, other housing with shared facilities and bedsits.</u>	<u>Policy No. H11.5 Student Housing, other housing with shared facilities and bedsits</u>
<u>DM C1 Community facilities.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>

<u>DM C2 Education for children and young people.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM E1 Employment areas in Merton.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E2 Offices in town centres.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E3 Protection of scattered employment sites.</u>	<u>Policy EC13.3 Protection of scattered employment sites</u>
<u>DM E4 Local employment opportunities.</u>	<u>Policy EC.13.4 Local Employment Opportunities</u>
<u>DM O1 Open space.</u>	<u>Policy O15.2 Open Space and Green Infrastructure</u>
<u>DM O2 Nature conservation, trees, hedges and landscape features.</u>	<u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.4 Protection of Trees</u>
<u>DM D1 Urban design and the public realm.</u>	<u>D12.2 Urban design</u>
<u>DM D2 Design considerations in all developments.</u>	<u>D12.3 Ensuring high quality design for all developments</u>
<u>DM D3 Alterations and extensions to existing buildings.</u>	<u>Policy D12.4 Alterations and extensions to existing buildings</u>
<u>DM D4 Managing heritage assets.</u>	<u>Policy D12.5 Managing heritage assets</u>
<u>DM D5 Advertisements.</u>	<u>Policy D12.7 Advertisements</u>
<u>DM D6 Telecommunications.</u>	<u>Policy D12.8 Digital infrastructure</u>
<u>DM D7 Shop front design and signage.</u>	<u>Policy D12.9 Shop front design and signage</u>
<u>DM EP1 Opportunities for decentralised energy networks.</u>	<u>Not taken forward.</u>
<u>DM EP2 Reducing and mitigating noise.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM EP3 Allowable solutions.</u>	<u>Not taken forward</u>
<u>Policy DM EP4 Pollutants.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM F1 Support for flood risk management.</u>	<u>Policy F15.8 Managing Local Flooding</u>
<u>DM F2 Sustainable urban drainage systems (SUDS) and; wastewater and water infrastructure.</u>	<u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u>
<u>DM T1 Support for sustainable transport and active travel.</u>	<u>Policy T16.2 Prioritising active travel choices</u>
<u>DM T2 Transport impacts of development.</u>	<u>Policy T16.3 Managing the transport impacts of development</u>
<u>DM T3 Car parking and servicing standards.</u>	<u>T16.4 Parking, deliveries and servicing</u>

<u>DM T4 Transport infrastructure.</u>	<u>T16.5 Supporting transport infrastructure</u>
<u>DM T5 Access to the Road Network.</u>	<u>Not taken forward</u>
<u>Appendices (A –L).</u>	<u>Chapter 17: Appendices</u>
<u>Policies Map (2014)</u>	<u>Polices Map (submitted 2022).</u>

0D4bi - Schedule of Additional Modifications to Merton's Draft Local Plan – March 2022

~~Red strikethrough~~ text indicates a proposed deletion

Red underlined text indicates a proposed addition to the text

Text in *italics* in the Proposed Changes column have a descriptive or instructive function and do not represent text to be retained unchanged.

The page and paragraph numbers are those in the [Stage 3 pre-submission draft Local Plan published for comments from 22 July to 6 September 2021 \(Ref. 0D1\)](#).

An absent Mod Ref. number in a sequence of numbers represents a former modification that is no longer proposed.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	November 2021 – for submission
AM1.1	2	1.1.8	<u>Once adopted, the Local Plan and associated Policies Map will supersede all existing polices in Merton's Core Planning Strategy (2011), Sites and Policies Plan (2014) and the Policies Map (2014).</u> Together with the London Plan, the South London Waste Plan (2012 and review to be once they are adopted 2022) and the Estates Local Plan 2018, the Local Plan will form the Statutory Development Plan under section 38 of the 2004 Planning and Compulsory Purchase Act for Merton.	To improve clarity by refereeing to all the relevant documents.	November 2021 – for submission
AM1.2	3	1.1.10	In accordance with the NPPF (para 20), the key strategic priorities that the local plan must address must include the following:	Typographical correction	November 2021 – for submission
AM1.3	3	1.1.15	At the time of writing (June 2021), the council's public consultation has just been completed on PlanWimbledon proposal to form a neighbourhood forum for their proposed neighbourhood area of Wimbledon. More information can be found on Merton's website: Neighbourhood plans (merton.gov.uk)	Factual update	November 2021 – for submission
AM1.4	4	1.1.21	Three stages of Public consultations stages of the Local Plan have already taken place in developing Merton's new Local Plan and policies map:...	More concise	November 2021 – for submission
AM1.5	4	1.1.21	<ul style="list-style-type: none"> A Stage 2a draft Local Plan public consultation took place between<u>from</u> 13th November 2020 to 1st February 2021. 	Grammar correction	November 2021 – for submission

AM1.5(a)	7	Last paragraph under 'Good Growth'	All development proposals in Merton, large or small, must accord with all relevant policies of this Local Plan and all other documents such as Supplementary Planning Documents (SPDs) which, make up Merton's Statutory Development Plan.	Removed as partly repetition from 1.1.7 and partly due to factual inaccuracy.	March 2022 – response to Inspectors' preliminary matters
AM1.6	9	1 st para under 'Stakeholders and partner organisations'	...We will work with community groups and organisations <u>across</u> Merton's diverse communities (faith and ethnicity) <u>including resident and business association, neighbourhood forums, cultural organisation,</u> disability groups, <u>faith groups,</u> children, young people, and the veteran community at Haigh Homes to deliver growth, as well as healthy and sustainable neighbourhoods. ...	Updated to reflect the council's aspirations to work with a wide range of different stakeholders.	November 2021 – for submission
AM1.7	12	3 rd paragraph	The Mayor will be developing a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth. Merton Council supports this approach and will work with local communities; the Mayor and partners to protected and enhance our rich heritage. <u>Merton Council supports a London-wide Heritage Strategy and we will work with the Mayor and communities in developing the strategy.</u>	For clarity	November 2021 – for submission
AM1.8	14	1 st para under 'Density and mixed uses'	...In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden , South Wimbledon, Morden and Colliers Wood will generally expect densities towards...	Deleted repetition.	November 2021 – for submission
AM1.9	14	3 rd para under 'Density and mixed uses'	In accordance with the London Plan 2021, taller buildings are one form of high-density development that can be <u>appropriate</u> in some <u>the</u> locations <u>identified in this plan,</u> subject to excellent design, good public transport accessibility <u>and</u> impact on existing character, heritage and townscape. ...	Add reference to statutory development plan for clarity	November 2021 – for submission
AM1.10	15	Last paragraph	...The council's overall spatial strategy is illustrated in the <u>Figure 1</u> below. This shows the broad locations of Merton's growth area. Development will still take place outside of the OA, although not at the same scale. Outside the OA, <u>where sites are</u>	Change made for clarity.	November 2021 – for submission

			<u>not allocated</u> , smaller scale development and more incremental change will take place.		
AM1.11	16	Figure 1 – Merton's spatial strategy	<i>Updated spatial strategy diagram to show new Wi3 boundary, removal of site Wi14 which was removed before Stage 3 consultation, adding site allocations to the key and altering the symbology of the opportunity area to make it clear which site allocations are within the opportunity area boundary.</i>	The diagram has been updated for consistency with changes and to improve clarity.	November 2021 – for submission
AM1.12	19	1 st bullet point under 'Colliers Wood'	<ul style="list-style-type: none"> Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health - providing a mix of uses, including substantial new homes (including affordable), employment and <u>social and</u> community uses. 	Text added to ensure consistency with terminology throughout the local plan.	November 2021 – for submission
AM1.13	21	1 st para under 'Morden'	The Morden Regeneration Zone (town-centre) is, expected to deliver circa 2000 new homes.	Change made for clarity and accuracy of where the comprehensive regeneration is planned for.	November 2021 – for submission
AM1.14	21	1 st bullet point under 'Morden'	Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health by delivering a mix of uses, including affordable homes, offices and other employment opportunities, social <u>and</u> community facilities and retail to support new homes.	Change made for clarity and consistency of terminology.	November 2021 – for submission
AM1.15	21	3 rd bullet point under 'Morden'	Deliver high quality homes, <u>which is</u> sympathetic to historic area which preserve local amenity and...	Improve clarity	November 2021 – for submission
AM1.16	22	1 st para under 'Mitcham Neighbourhood'	<u>Most of the Mitcham neighbourhood lies outside the Opportunity Area (see Figure 2) aside from parts of the neighbourhood around Church Road and bordering Morden.</u>	For clarity and to ensure the text aligns with the Mitcham neighbourhood shown on Figure 2.	November 2021 – for submission

AM1.17	22	1 st bullet point under 'Mitcham Neighbourhood'	<ul style="list-style-type: none"> Reduce inequalities in the neighbourhood and improve the wider determinates of health by providing a mix of uses, including substantial new homes (including affordable), employment and <u>social and</u> community uses. 	Change made for clarity and consistency of terminology.	November 2021 – for submission
AM1.18	22	3 rd bullet point under 'Mitcham Neighbourhood'	<ul style="list-style-type: none"> Explore opportunities for social housing estate regeneration. We will engage and work with housing providers in Mitcham neighbourhood. The Council's ambition is that regeneration will focus primarily on improving the quality of housing stock but also offers the potential to create an improved physical environment and enhanced connectivity as well as address several social and economic issues. This is a long-term aspiration which will continue outside this plan period. 	This text has been removed to align with the current status of the Clarion Estates Regeneration programme, which has already begun.	November 2021 – for submission
AM1.19	30	Strategic Objective 3: places for people, part e.	Assessing the impact of <u>Requiring</u> major development proposals <u>to maximise the positive impacts and minimise adverse impacts</u> on physical and mental health and wellbeing to maximise the positive impacts and minimise adverse impacts.	To improve accuracy and clarity arising from HUDU's representations	November 2021 – for submission
AM1.20	32	Vision, 4 th bullet point	<u>Improved community health and wellbeing and</u> reduced health and income inequality within the borough and the disparities between the east and west of the borough.	To improve clarity and arising from HUDU's representations that reducing inequalities does not necessarily equate to improvements	November 2021 – for submission
AM1.22	32	Vision, 9 th bullet point	Improved access to our unique rich heritage and historic environment for all, while encouraging innovations in building technology and improving sense of	Correct typographical error	November 2021 – for submission
AM2.1	Multiple pages	All policies	<u>JUSTIFICATIONSUPPORTING TEXT</u>	A more accurate descriptive sub-heading to improve clarity.	November 2021 – for submission

AM2.3	37	Footnote 2	Based on sites identified to be delivered during the 15 year plan period and an assumed delivery of the Intend to Publish London Plan <u>2021</u> target for Merton of 918 new dwellings per year for the remaining 15 years to 2050. See Housing policies for further details.	Updated to refer to the current London Plan, to improve accuracy.	November 2021 – for submission
AM2.4	40	2.1.20	Policy CC2.5 ‘Minimising waste and promoting a circular economy’ sets out Merton’s requirements to minimise embodied carbon and Policy CC2.6 sustainable design standards adapting to a changing climate sets out the sustainability standards required of development in Merton.	To improve clarity and accuracy, the policy reference has been updated.	November 2021 – for submission
AM2.5	42	Policy CC2.2 Minimising Greenhouse Gas Emissions, part a	To reduce greenhouse gas emissions on-site and minimise both annual and peak energy demand in accordance with the Mayor of London’s Energy Hierarchy below, or in line with any future locally derived methodology:	Modified in response to consultation feedback received at stage 3 to avoid onerous wording.	November 2021 – for submission
AM2.5	43	Policy CC2.2 Minimising Greenhouse Gas Emissions, part d	To demonstrate compliance with the Mayor’s net-zero carbon target, or any future locally derived target.	See above - initial AM2.5 at Page 42 Plan Ref. Policy CC2.2, part a	November 2021 – for submission
AM2.5	44	2.2.5	In addition, all new build development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA will need to demonstrate compliance with the Mayor’s net-zero carbon target, or any future locally derived target. This means that any carbon shortfall ⁸ will need to be offset via renewable energy generation offsite or via cash-in-lieu contributions.	See above - initial AM2.5 at Page 42 Plan Ref. Policy CC2.2, part a	November 2021 – for submission
AM2.5	45	Footnote 8	Using the Part L methodology, or any future locally derived methodology.	See above - initial AM2.5 at Page 42 Plan Ref. Policy CC2.2, part a	March 2022 – response to Inspectors’ preliminary matters
AM2.5a	46	2.2.8	This net-zero carbon target will be reviewed as and when national and regional policy changes (e.g. updates to Building Regulations expected in 202 23 and 2025 and any updates to the London Plan), and as part of the Local Plan review in 5 years.	Amended to correct a typo.	March 2022 – response to Inspectors’ preliminary matters

AM2.5b	53	2.3.7	Improved fabric energy efficiency will ensure that buildings use low and zero carbon energy in the most efficient way [11]. As well as reducing greenhouse gas emissions, using ultra-high levels of fabric efficiency alongside heat pumps and Mechanical Ventilation and Heat Recovery (MVHR) systems can help reduce annual and peak electricity demand, provide comfort and health benefits to occupants, and deliver average bill savings of around £85 per year for a typical three bedroom semi-detached house [11], <u>which will help tackle fuel poverty in Merton</u> . This will also help ‘future proof’ developments and reduce the likelihood of buildings needing difficult and expensive refurbishment at a later date.	Added to highlight benefits of energy efficiency improvements for fuel poverty, particularly in the context of energy price rises.	March 2022 – response to Inspectors’ preliminary matters
AM2.6	54	New paragraph after 2.3.13	<u>In the past 5 years, non-residential development in Merton has included everything from a football stadium, to a hotel development, to a mixed-use development comprising a community gym/ retail space, hostel and residential development. Given the range of non-residential developments that could come forward in Merton over the lifetime of this Local Plan, the council will work with applicants towards achieving this target on a case by case basis for any bespoke non-residential development.</u>	Added to clarify approach for bespoke non-residential developments given the range of non-residential developments in Merton.	November 2021 – for submission
AM2.7	55	2.3.17	LETI’s Climate Emergency Design Guide <u>and the UK Green Building Council’s Net Zero Whole Life Carbon Roadmap</u> , which sets out a roadmap to net-zero carbon, <u>both</u> recommends the use of Energy Use Intensity (EUI) targets in regulations, policy and design decisions to drive energy efficiency [9] [24]. <u>[24] UKGBC, “Net Zero Whole Life - Summary for Policy-Makers,” 2021. [Online]. Available: https://www.ukgbc.org/wp-content/uploads/2021/11/UKGBC-Whole-Life-Carbon-Roadmap-Summary-for-Policy-Makers.pdf. [Accessed 22 11 2021].</u>	To improve clarity, a reference is included to additional supporting evidence, which was published in November 2021 since the last Local Plan consultation. Reference also added.	November 2021 – for submission
AM2.7a	56	2.3.21	<u>In their Climate Emergency Design Guide</u> , LETI have identified energy consumption targets for four building typologies consistent with achieving national net-zero carbon targets; LETI concluded that all new build development should be designed to achieve these standards by 2025 [9]:	Modified to improve clarity regarding the source.	March 2022 – response to Inspectors’ preliminary matters

AM2.8	57	Policy CC2.4 Low Carbon Energy, part a	All new development to use low carbon heat. There can be no gas boilers in new dwellings or new non- domestic <u>residential</u> development in Merton from January 2023.	Modified to ensure consistency in wording throughout climate change policies (residential vs domestic).	November 2021 – for submission
AM2.9	59	2.4.7	No gas boilers can be installed in new dwellings or new non- domestic <u>residential</u> development from January 2023.	Modified to ensure consistency in wording throughout climate change policies (residential vs domestic).	November 2021 – for submission
AM2.10	66	New paragraph after 2.5.7	<u>All applications that are referable to the Mayor of London will need to submit Circular Economy Statements that have been prepared in accordance with the GLA’s Circular Economy Statement Guidance¹⁸.</u> <u>¹⁸ Mayor of London (2020) Circular Economy Statement Guidance – Draft for Consultation (Available at: https://www.london.gov.uk/publications/circular-economy-statement-guidance).</u>	Modified to clarify London Plan requirements for referable schemes. Footnote also added with a link to the Mayor of London’s Circular Economy Statement Guidance.	November 2021 – for submission
AM2.11	68	Policy CC2.6 Sustainable Design Standards, part d	Requiring all conversions and changes to the use of existing buildings resulting in the creation of 10 or more new dwelling(s) to achieve a minimum BREEAM Domestic Refurbishment rating of ‘Excellent’ or equivalent.	Modified to correct typographical error.	November 2021 – for submission
AM2.12	72	Bibliography Ref 14	[14] Etude, “Islington Energy Evidence Base,” 2016 <u>2017</u> . [Online]. Available: https://www.islington.gov.uk/media/sharepointlists/publicrecords/planningandbuildingcontrol/publicity/publicnotices/20182019/20181121islingtonenergyevidencebasestudynovember20171.pdf?la=en&hash=164DFEDE701FAE92BDEDD1FF9091505FD769BC60 https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20212022/20210718islingtonenergyevidencebasestudynovember	Modified to provide new link; old link was broken.	November 2021 – for submission

			2017.pdf?la=en&hash=B9F5B29BFE300D8481FD55325CF434DA12815104.		
AM3.1	85	3.1.13	Crossrail2 <u>construction has been delayed and</u> will not be finished until after 2036,...	To improve clarity and accuracy about the delays to Crossrail2.	November 2021 – for submission
AM3.1	85	3.1.16	...until Crossrail2 is finishing <u>beyond</u> in the 2030s.	See above – Initial AM3.1 at Page 85 Plan Ref. 3.1.13	November 2021 – for submission
AM3.2	89	Site Allocation CW1, Design and accessibility guidance:	<u>The site-TfL’s strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. However, there is a lack of space on the public highway to facilitate this. Should residential or commercial-mixed use development not take place on Site CW1, then we would welcome a secure cycle hub on this site as it is opposite the underground station and accessible to both the Wandle Trail and the Cycle Superhighway. There is also an anticipated requirement for space to accommodate docking areas to facilitate future cycle or scooter hire schemes considering the high expected demand in this location so, this site may be required to make provision for docking areas for cycle/ scooter hire schemes in proximity to the public highway.</u>	Wording amended and amalgamated with statement on commuter cycle storage/ hub moved and amended from Infrastructure requirements in response to comments from TfL to provide clarification on the requirements for cycle storage/ hub for commuter parking and for space for cycle/ scooter docking stations.	November 2021 – for submission
AM3.4	89	Site Allocation CW1, Infrastructure Requirements:	There is a need for secured cycle parking provision for commuters in Colliers Wood and there is a lack of space on the public highway to facilitate this. Should residential development not take place on Site CW1, then we would welcome a secure cycle hub on this site as it is opposite the underground station and accessible to both the Wandle Trail and the Cycle Superhighway.	See above. Related matters included in modification to Design and Accessibility Guidance.	November 2021 – for submission

AM3.5	89, 93, 96, 100, 103.	All Site Allocations, Infrastructure Requirements:	Development proposals for this site must <u>refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.</u>	Wording was reviewed following the Stage 3 Local Plan submission received from HUDU and changes made for clarity on infrastructure requirements for each Site Allocation.	November 2021 – for submission
AM3.6	92	Site Allocation CW2, Design and accessibility guidance:	<u>TfL's strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. However there is a lack of space on the public highway to facilitate this, so this site may be required to make provision for an appropriate amount and type of publicly accessible cycle storage for commuters. There is also an anticipated requirement for space to accommodate docking areas to facilitate future cycle or scooter hire schemes considering the high expected demand in this location so, where appropriate, development may be required to make some provision for docking stations for cycle/scooter hire schemes in proximity to the public highway.</u>	Amended wording in response to comments from TfL to provide clarification on the requirements for cycle storage/ hub for commuter parking and for space for cycle/ scooter docking stations.	November 2021 – for submission
AM3.7	93	Site Allocation CW2 Infrastructure Requirements:	<u>This site is in close proximity to National Grid infrastructure YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the</u>	Wording has been added at the request of National Grid, following their Stage 3 Local Plan submission, to protect the nearby National Grid assets.	November 2021 – for submission

			<u>developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.</u>		
AM3.8	93	Site Allocation CW2 Infrastructure Requirements:	Thames Water have indicated that the scale of development for this site that, upgrades of the water supply network infrastructure and wastewater network <u>and sewage treatment infrastructure</u> are likely.	Added to ensure Thames Water infrastructure requirements are made clear for future development of the site.	November 2021 – for submission
AM3.9	93	Site Allocation CW2, Impacts on Archaeological Priority Area	Yes, Wandle Valley/Colliers Wood Archaeological Priority <u>ZoneArea</u> Tier 2 <i>(Change all references to ‘Archaeological Priority Zone’, to ‘Archaeological Priority Area’, including the related acronyms, APZ to APA, throughout the Local Plan)</i>	For clarity by using the same terminology as that used by Historic England and in the London Plan.	November 2021 – for submission
AM3.10	99	Site Allocation CW4 Design and accessibility guidance:	<u>TfL’s strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. However there is a lack of space on the public highway to facilitate this so redevelopment of the station should make provision for an appropriate amount and type of cycle storage for commuters. There is also an anticipated requirement for space to accommodate docking areas to facilitate future cycle or scooter hire schemes considering the high expected demand in this location so, where appropriate, development may be required to make some provision for docking stations for cycle/scooter hire schemes in proximity to the public highway.</u>	Wording amended and amalgamated with statement on commuter cycle storage/ hub moved and amended from Infrastructure requirements in response to comments from TfL to provide clarification on the requirements for cycle storage/ hub for commuter parking and for space for cycle/ scooter docking stations.	November 2021 – for submission

AM3.11	100	Site Allocation CW4 Infrastructure Requirements:	There is a need for secured cycle parking provision for commuters in Colliers Wood and there is a lack of space on the public highway to facilitate this. In the long term, should a cycle hub not be installed on other Transport for London sites including Site CW.1, then in the long term we would welcome a secure cycle hub on this site as it is located close to the underground station and accessible to both the Wandle Trail and the Cycle Superhighway.	Deleted from Infrastructure Requirements and moved to Design and Accessibility Guidance and amended for clarity.	November 2021 – for submission
AM3.12	101	Site Allocation CW4, Site description:	The western boundary of the site is formed by the Pickle Ditch, a tributary of the river Wandle, a riparian green space and remnants of the historic Merton Priory Wall. The Pickle Ditch, a tributary of the river Wandle, a riparian green space and remnants of the historic Merton Priory Wall, forms the western boundary of the site. Sainsbury's and Marks and Spencer are found beyond that in a single purpose-built podium supermarket with car parking underneath.	To improve clarity	November 2021 – for submission
AM3.13	104	Site Allocation CW5, Design and accessibility guidance:	<u>In line with the Environment Agency requirements, development proposals must enhance the Pickle Stream corridor, including the removal of concrete banks, restoration of ecology to the watercourse and inclusion of a 10m wide riverside buffer strip.</u>	Change made at the request of the Environment Agency for this site allocation.	November 2021 – for submission
AM3.14	105	Site Allocation CW5, Infrastructure Requirements	Thames Water have indicated that the scale of development for this site is likely to require upgrades of the water supply network infrastructure, but there are no infrastructure concerns for the wastewater network <u>and</u> or wastewater treatment infrastructure capability. ...	Change made to ensure Thames Water infrastructure requirements are made clear for future development of the site.	November 2021 – for submission
AM3.9	104	Site Allocation CW5, Impacts on Archaeological Priority Area	Parts of the site hold a listed structure of Merton Priory wall remnants and are within a Archaeological p Priority zones <u>Area Tier 2</u> .	For clarity by using the same terminology as that used by Historic England and in the London Plan.	November 2021 – for submission
AM4.1	112	Mitcham: Policy N4.1 m	Support the regeneration at <u>Eastfields, Ravensbury and</u> Pollards Hill to provide good quality new homes and services and refurbish existing homes in a landscaped setting.	To improve clarity and accuracy by including references	November 2021 – for submission

				to the relevant estates for which the regeneration is supported by the adopted Estates Local Plan 2018.	
AM4.2	112	Mitcham: Policy N4.1p	Support and improve the quality of local <u>Neighbourhood Parades</u>	To improve clarity in response to Mitcham Cricket Green Community and Heritage	November 2021 – for submission
AM4.3	115	Para 4.1.13	Mitcham Cricket Green is an attractive neighbourhood with a wealth of historic assets surrounding Cricket Green, <u>a site used for cricket for more than 300 years. the oldest continuously played cricket pitch in the country.</u> ...	Change made for factual correctness.	November 2021 – for submission
AM4.4	115	Para 4.1.14	The Canons House and grounds is an attractive historic landscape but has not been well used or much known outside the Mitcham Cricket Green area. The Canons <u>National</u> Heritage Lottery Fund <u>and National Lottery Community Fund</u> “Parks for People” project is to shine a spotlight on this underplayed and underused landscape. The project <u>aims to will</u> increase footfall and visibility of the Canons House and Grounds to be a better used asset for Mitcham.	Change made for factual correctness.	November 2021 – for submission
AM4.5	116	New paragraph after 4.1.16	<u>The London Plan 2021 identifies Mitcham as an area with potential for housing growth. Merton’s Borough Character Study 2021 analyses the existing character of Mitcham’s neighbourhoods, which are generally lower density and low rise. We will continue to support the development of new homes and associated infrastructure in Mitcham in site allocations, in incremental development and via estate regeneration. Merton’s Estates Local Plan 2018 guides the regeneration of Eastfields and Ravensbury estates, which are underway and will provide a substantial number of new homes and considerably improve the housing stock over the next 15 years. Regeneration plans have</u>	To improve clarity and accuracy by including references to the relevant estates for which the regeneration is supported by the adopted Estates Local Plan 2018.	November 2021 – for submission

			<u>also been developed for Pollards Hill to provide new homes to the south east of the borough.</u>		
AM4.6	117-169	All Site Allocations	Development proposals for this site must <u>refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</u> have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.	Wording was reviewed following the Stage 3 Local Plan submission received from HUDU and changes made for clarity on infrastructure requirements for each Site Allocation.	November 2021 – for submission
AM4.7	119	Site allocation Mi1, Site description	To the north of the site, beyond Cappagh's car pound boundary, lies White Bridge Avenue, a residential road and Benedict Primary School. Morden Hall Park, a historic park owned by the National Trust, lies circa 200m to the north <u>westeast</u> of the site boundary. To the <u>west east</u> of the site boundary lies Baron Walk, a fenced off path and beyond lies London Road playing fields.	Factual correction	November 2021 – for submission
AM4.8	121	Site allocation Mi1, Infrastructure Requirements	The scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure <u>and sewage treatment infrastructure.</u>	Added to ensure Thames Water infrastructure requirements are made clear for future development of the site.	November 2021 – for submission
AM4.9	123	Site allocation Mi2, Site owner	National Health <u>NHS</u> Property Service (NH H SPS)	Factual correction to site owner details.	November 2021 – for submission
AM4.10	126	Site allocation Mi3, Site description	...On the part of the site that faces Cricket Green is a two-storey red brick and wood building, <u>currently</u> in use as a Cricket Pavilion serving the cricket club on Cricket Green. ... The cricket pavilion <u>opened in 1904 built around 1920</u> and the associated land and building is the only dedicated facility supporting the playing of cricket on Mitcham Cricket Green. ...	Factual correction based on Mitcham Cricket Green Community and Heritage representation	November 2021 – for submission

AM4.11	127	Site allocation Mi3, site allocation	Use of the Burn Bullock building as in non-residential uses...	Grammatical correction	November 2021 – for submission
AM4.12	128	Site allocation Mi3, Impacts Listed Buildings or undesignated heritage assets.	The cricket pavilion <u>opened in 1904 built around 1920</u> , and associated land / building is the only dedicated facility supporting cricket playing on Mitcham Cricket Green.	Factual correction based on Mitcham Cricket Green Community and Heritage representation	November 2021 – for submission
AM4.13	132	Site allocation Mi5, Design and accessibility guidance:	Development proposals need to be sympathetic to the historic setting, particularly of Canons House and the views from the nearby Metropolitan Open Land <u>and have regard to The Canons Conservation Area Management Plan</u> .	To improve clarity – reference to conservation area already given later in the site allocation	November 2021 – for submission
AM4.14	132	Site allocation Mi5, Impacts Listed Buildings or undesignated heritage assets.	Yes, historic assets within the surrounding area include the Grade II* listed Canons House, <u>the adjacent Grade II* listed wall</u> and the Grade II listed Dovecote	Factual addition to refer to listed structure arising from Mitcham Cricket Green Community and Heritage	November 2021 – for submission
AM4.15	134	Site allocation Mi6, Design and accessibility guidance:	Development proposals must recognise the site's close proximity to Grade II Elm Lodge and structures, Grade II milestone and heritage assets near the site and must consider the setting of heritage assets. <u>326 London Road was added to Merton's Local List in 2020</u> .	Factual addition arising from Mitcham Cricket Green Community and Heritage	November 2021 – for submission
AM4.15	134	Site allocation Mi6, Impacts Listed Buildings or undesignated heritage assets.	Yes. Grade II Elm Lodge and structures, Grade II milestone. <u>326 London Road was added to Merton's Local List in 2020</u> .	See above – Initial AM4.15 at Page 134	November 2021 – for submission
AM3.9	134	Site Allocation Mi6, Impacts on Archaeological Priority Area	Yes. Mitcham Village Archaeological Priority Zone <u>Area</u> (APZA) <u>Tier 2</u>	For clarity by using the same terminology as that used by Historic	November 2021 – for submission

				England and in the London Plan.	
AM3.9	136	Site Allocation Mi7, Impacts on Archaeological Priority Area	Yes. Mitcham Village Archaeological Priority Zone <u>Area</u> (APZA) <u>Tier 2</u> ...	See above – Initial AM3.9 at Page 134	November 2021 – for submission
AM4.16	138	Site Allocation Mi8, Site owner	Appleby <u>Centrica Combined Common Investment Fund</u>	Factual correction	November 2021 – for submission
AM4.17	138	Site Allocation Mi8, Site Allocation	Mixed use: <u>Town Centre Type Uses including</u> retail, businesses, food and drink, <u>leisure</u> and community services (health centres, crèches, day nurseries, day centre) on the ground floors, residential on upper floors.	Terminology added for clarity.	November 2021 – for submission
AM4.18	139	Site Allocation Mi8, Infrastructure Requirements	<u>Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.</u> Thames Water does not envisage infrastructure concerns about the water supply network infrastructure , wastewater network or	Changed to ensure Thames Water infrastructure requirements are made clear for future development of the site.	November 2021 – for submission

			wastewater treatment infrastructure capability in relation to the development of the site.		
AM3.9	139	Site Allocation Mi8, Impacts on Archaeological Priority Area	Yes, two <u>Mitcham</u> Archaeological Priority Zones <u>Area Tier 2</u>	For clarity by using the same terminology as that used by Historic England and in the London Plan.	November 2021 – for submission
AM4.19	140	Site allocation Mi9, Site description	This site is a 2-3 storey building (fire station) set in a group of buildings, including 3-4 storey Vestry Hall next to the rear of the site (northeast) and the <u>new homes on the former</u> Cricketers pub site, which is currently being redeveloped, next to the adjacent southeast of the site. Next to the northwest of the site is triangular open space known as Lower Green. The site fronts Lower Green Road. Cricket Green (recreational open space) lies to the southeast of the group of buildings, across London Road from Vestry Hall and is close to a <u>Grade II listed</u> war memorial. <u>On 25th November 2021 planning permission was granted for nine homes (reference 20/P0801)</u>	Factual updates for clarity as recommended by Mitcham Cricket Green Community and Heritage	November 2021 – for submission
AM4.20	159	Site allocation Mi16, Existing uses	The site is currently vacant <u>for c 15 years aside from a large gasholder within the northern corner of the site that has permission for demolition having most recently been used as regional offices for National Grid.</u>	Factual updates for clarity - put forward by St William	November 2021 – for submission
AM4.21	161	Site Allocation Mi16, Impacts on Archaeological Priority Area	<u>No, adjacent to</u> Mitcham a <u>Archaeological p</u> Priority zone <u>Area Tier 2</u>	Factual correction	November 2021 – for submission
AM4.22	198	Moved Site Allocation Mo3	<i>Site Allocation Mo3 is to be moved from the Morden Neighbourhood chapter to the Mitcham Neighbourhood chapter and inserted as the last site allocation in that chapter. For ease of reference, the reference number 'Mo3' it to be retained.</i>	To improve clarity and accuracy, the site allocation is moved to the Mitcham Neighbourhood in	November 2021 – for submission

				which it is located however, for ease of reference, the number 'Mo3' will be retained. All the site reference numbers will be reviewed with the view of renumbering only at the final stage prior to adoption of the Local Plan. This proposed modification is also listed as AM5.41 for the Morden Neighbourhood chapter.	
AM4.23	199	Moved Site Allocation Mo3, Design and Accessibility Guidance	On 20 August 2020, Merton's Planning Applications Committee resolved to grant planning permission for the development of 77 homes on the site, subject to the completion of a S106 legal agreement and conditions. This application is considered to be of potential strategic importance and therefore, as part of Stage 2 of the referral process, the Mayor of London <u>reviewed the application. In April 2021, the Mayor decided that the council's decision could stand and the application was therefore approved now has to make a decision to allow the Planning Applications Committee decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority.</u>	Factual correction. Text has been updated to reflect the current status of the planning application for this site.	November 2021 – for submission
AM4.24	200	Moved Site Allocation Mo3	<u>PTAL 1, very poor 2 poor</u> access to public transport.	Factual correction	November 2021 – for submission
AM5.1	172	PLACE PROFILE: MORDE	As part of the <u>Borough's ongoing Merton</u> Character Study <u>SPD 2021</u> , 415 Merton residents took part in an online public survey, of which 91 people live in Morden. The diagram below highlights how people felt about their neighbourhood based on a series of	Removal of unnecessary repetition to improve clarity and conciseness.	November 2021 – for submission

			questions asked. This work was also used to inform the Borough Character Study 2021.		
AM5.2	173	KEY OBJECTIVES: MORDEN	Diversifying and supporting retailers Supporting an appropriate and diverse mix of retail, office, community and leisure uses, including night time uses.	Grammar correction	November 2021 – for submission
AM5.3	173	KEY OBJECTIVES: MORDEN	Improving public space Prioritise pedestrians and cyclists in the regeneration of public spaces and streets in the Morden Regeneration Zone and the Wider Morden Town Centre Area.	To improve clarity and accuracy on matter, that public space and transport improvements will be sought throughout the Morden Neighbourhood.	November 2021 – for submission
AM5.4	175	CHARACTER: MORDEN	<i>Photograph of mosque updated</i>	To show recently installed façade features.	November 2021 – for submission
AM5.5	176	Morden Policy N5.1 text	This policy supports the rejuvenation <u>regeneration</u> of Morden...	To improve clarity through consistency of the use of the word, 'regeneration'.	November 2021 – for submission
AM5.6	176	Morden Policy N5.1 text	This policy supports the rejuvenation <u>regeneration</u> (AM5.5) of Morden <u>Town Centre</u> to create a modern, attractive and vibrant destination that meets the needs of the current and future residents, businesses and visitors, and provides economic, social and environmental benefits.	To improve clarity by specifying the town centre area that the relevant phrase or sentence is referring to and the addition of a related clarifying sentence to paragraph 5.1.37.	November 2021 – for submission
AM5.7	176	Morden Policy N5.1 text	...intensification and comprehensive development <u>regeneration</u> within Morden Regeneration Zone...	To improve clarity through the addition of a definition in paragraph 5.1.18 and consistent use of the same phrase, in the policy text,	November 2021 – for submission

				supporting text and the text for site allocation Mo1.	
AM5.8	176	Morden Policy N5.1 text	...within the Morden Regeneration Zone <u>(Site Mo1)</u> .	To improve clarity by specifying the area that is being referred to and highlight the link between the policy and the site allocation.	November 2021 – for submission
AM5.9	177	Morden Policy N5.1 text	<p>The development capacity of the Wider Morden Town Centre Area will be significantly increased through a plan-led approach which will:</p> <ul style="list-style-type: none"> • incorporate new homes at higher densities than the surrounding residential streets, with a diverse mix of housing sizes and tenures. • improve and diversify space for shops and businesses. • provide high quality public realm and attractive and useful public spaces and planting. • create healthier streets with better connectivity and permeability for pedestrians and cyclists. • reduce traffic dominance, improve walking, cycling and vehicle links into and around the town centre; and • provide better services and facilities for the people who live, work or study in, or pass through Morden. <p>By focusing regeneration in the Wider Morden Town Centre Area, this plan-led approach will help to enhance the character and distinctiveness of the surrounding suburban Morden Neighbourhood.</p>	Removed to improve clarity by avoiding unnecessary repetition and details of matters addressed elsewhere in the policy or supporting text.	November 2021 – for submission
AM5.10	177	Morden Policy N5.1, part a.	...the Morden Regeneration Zone (Site Mo <u>41</u>)...	To signify the Morden Regeneration Zone site allocation's priority within the Morden Neighbourhood, all	November 2021 – for submission

				references to it are to change to Mo1 and the reference number for proposed Site Allocation for the Chaucer Centre, Canterbury Road, is to change to Mo4.	
AM5.12	178	Morden Policy N5.1 part g.	Investigating the feasibility of decentralised energy and district heating which takes account of opportunities within the Morden Regeneration Zone, the Wider Morden Town Centre Area and potentially the wider Morden Neighbourhood. Suitable futureproofing measures should be implemented where appropriate.	Deleted to avoid unnecessary duplication of matters that are adequately addressed in draft Local Plan policy CC2.4 b. v.	November 2021 – for submission
AM5.11	178	Morden Policy N5.1, part i.	<p><i>Insert before point i</i></p> <p><u>Surrounding Morden Neighbourhood</u></p> <p><u>In the surrounding Morden Neighbourhood we will:</u></p> <p>Ensuring that development within the Morden neighbourhood (AM5.11), which surrounds the Wider Morden Town Centre Area, (MM5.1) conserves and enhances its suburban character of terraced and semi-detached homes and abundant green infrastructure.</p>	To improve clarity by creating a distinction between the aspects of the policy that relate to the regeneration of Morden Town Centre and those that relate to the surrounding Neighbourhood, the use of the same phrase throughout the policy and by improved consistency with the format of the other Neighbourhood policies.	November 2021 – for submission

AM5.12a	178	Morden Policy N5.1 part j.	Supporting transport improvements within the Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area(MM5.1), such as improvements to the existing tram network and improvements that help enable <u>sustainable and active travel choices</u> .	To improve clarity, that trams and other forms of sustainable transport will be supported and to make the policy wording more concise.	November 2021 – for submission
AM5.13	179	Paras 5.1.1-3	<p>5.1.1 Morden's initial growth was fuelled by investment in London's Underground network, with the arrival of the tube in 1926 which resulted in the rapid development of 'Metroland' type residential suburbs in the surrounding area during the following decade.</p> <p>5.1.2 The attraction of abundant green open spaces, clean air and easy access into central London, made the area a popular destination for families in search of a suburban lifestyle.</p> <p>5.1.3 Almost 100 years later, Morden is changing once again. There is a strong presence of a working age population with a high proportion of families and younger people. People in search of a more suburban lifestyle are heading to Morden due to its leafy suburban nature and excellent connections into central London. Morden's transformation is required to ensure that it continues to meet the needs of the existing and future residents, businesses and users of the area.</p>	This background text is not necessary and it is proposed to be deleted to make the supporting text more concise.	November 2021 – for submission
AM5.6	179	5.1.4	The character of Morden t <u>T</u> own e <u>C</u> entre has eroded over time, but...	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.14	179	5.1.4	<u>The scale and comprehensive nature of the regeneration within the Morden Regeneration Zone provides the opportunity to reimagine the town centre and to create new character areas and features.</u> It is important that new development celebrates, develops and strengthens this <u>the existing</u> physical character, but without necessarily copying it unimaginatively.	To improve clarity about the expected nature and scale of the regeneration sought within the Morden Regeneration Zone.	November 2021 – for submission

AM5.6	179	5.1.5	In terms of activity, Morden town Centre is a busy transport interchange and the civic focus of the borough. The town Centre also has a broad range of shops, cafes and restaurants.	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.15	180	5.1.7	...when Transport for London (<u>TfL</u>), a major landowner...	To improve clarity when the acronym is used later in text.	November 2021 – for submission
AM5.16	180	5.1.9	The Strategic Development Framework defines: <ul style="list-style-type: none"> Why the regeneration of Morden <u>Regeneration Zone</u>Town Centre is necessary and important (the 'Vision'). 	To improve clarity and accuracy by specifying the area that the text relates to.	November 2021 – for submission
AM5.17	181	5.1.12	...is within an Opportunity Area as designated in the London Plan 2021 <u>and identified in Figure 2: Opportunity Area, in Chapter 1B 'Good Growth'</u> . We will <u>work with the GLA to</u> produce an Opportunity Area Planning Framework which will...	To improve clarity, accuracy and constancy with regards to OAPF matters elsewhere in the Local Plan.	November 2021 – for submission
AM5.17a	181	5.1.13	Morden town centre was identified as an opportunity for housing intensification in Merton's 2011 Core Planning Strategy (CS3), with the Sustainability Appraisal recognising positive improvements that could be made to retail provision, the public realm and the capacity of Morden's transport interchange.	This background text is not necessary and it is proposed to be deleted to make the supporting text more concise.	November 2021 – for submission
AM5.18	181	5.1.14	One of the aims of this Local Plan policy is to improve the experience for the current and future users...	To improve clarity and accuracy.	November 2021 – for submission
AM5.6	181	5.1.14	One of the aims of this Local Plan policy (AM5.18) is to improve the experience for the current and future users of Morden <u>town centre</u> , making it a destination and not simply a thoroughfare.	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.19	181	5.1.14	This will be facilitated by improving the quantity, quality and mix of housing offer through optimising intensification of residential development at the heart of Morden,...	Improve clarity and consistency with the use of similar wording to that in London Plan policies SD6, D1 D3 and H1.	November 2021 – for submission

AM5.20	181	5.1.14	...residential development at the heart of Morden, alongside the delivery of a range of associated improvements to the public realm, transport and t Town e Centre t Type u Uses.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.21	181	5.1.16	...the Morden Regeneration Zone represents an ideal opportunity to provide circa 2,000 <u>residential</u> units towards meeting this target,...	To improve clarity and accuracy.	November 2021 – for submission
AM5.22	181-182	5.1.17	Within the Wider Morden Town Centre Area, the provision of adaptable housing will be sought, namely homes that can adapt internally to the changing circumstances of their occupants, which requires well thought out, flexible internal layouts as per the Mayor’s Design Guidance. Mixed tenure and a range of dwelling types, along with modern flexible business spaces, will create a mixed community that responds to housing, business and leisure needs and creates a vibrant and diverse community that is robust in times of change and has appropriate protection against decline.	Deleted to avoid unnecessary duplication of matters that are adequately addressed in other Local Plan policies.	November 2021 – for submission
AM5.23	182	5.1.18	As Merton Council and TfL (Transport for London) both own	Delete to remove unnecessary duplication of details provided above (AM5.15).	November 2021 – for submission
AM5.7	182	5.1.18	There are also multiple other land ownership interests within the Morden Regeneration Zone and a land assembly strategy will be required to ensure that the site can be <u>developed in a comprehensive manner, to regenerated comprehensively and</u> avoid fragmented development and suboptimal densities in this highly accessible location. <u>References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method.</u>	See above – Initial AM5.7 at Page 176	November 2021 – for submission
AM5.7	183	5.1.23	One of the key aims of the comprehensive <u>redevelopment regeneration</u> of the Morden Regeneration Zone is to	See above – Initial AM5.7 at Page 176	November 2021 – for submission
AM5.24	183	5.1.23	<i>Add the sentence at the end of the paragraph.</i> <u>The new bus standing facilities are identified as a medium to long term requirement in the Infrastructure Delivery Plan 2021 and in accordance with policy IN 14.1 Infrastructure,</u>	To improve clarity by highlighting potential planning contributions.	November 2021 – for submission

			<u>developments may be required to make planning contributions towards the provision of these facilities.</u>		
AM5.6	183	5.1.24	The dominance of the road and traffic network throughout Morden <u>Town Centre</u> results in a poor experience for pedestrians and cyclists and negatively impacts on public realm.	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.6	184	5.1.28	Potential solutions to these urban design matters and indicative details of a potential hierarchy of streetscapes for <u>the Morden town-centre</u> <u>Regeneration Zone</u> are set out in the SDF.	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.6	184	5.1.29	Morden <u>town centre</u> already benefits from a number of large green spaces on its periphery.	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.25	184	5.1.31	Combined with a reduction in vehicular through traffic, <u>these green</u> spaces can reawaken the garden city principles...	To improve clarity by specifying the type of spaces that this text is referring to.	November 2021 – for submission
AM5.26	184	5.1.32	The introduction of higher density development <u>and tall buildings</u> within in the Wider Morden Town Centre Area and in particular within the (MM5.1) Morden Regeneration Zone,...	To improve clarity that, along with increased density, tall buildings will also be appropriate within the Morden Regeneration Zone.	November 2021 – for submission
AM5.19	184	5.1.32	The introduction of higher density development <u>and tall buildings</u> (AM5.26) within in the Wider Morden Town Centre Area and in particular within the (MM5.1) Morden Regeneration Zone, will <u>optimise residential development and</u> help to meet the need for additional and mixed housing in the area and will promote a more balanced and cohesive community.	See above – Initial AM5.19 at Page 181 Plan Ref. 5.1.14	November 2021 – for submission
AM5.27	185	5.1.33	Tall buildings that meet the requirements in policy D512.6, ...	To update the policy reference number.	November 2021 – for submission
AM5.19	185	5.1.33	...appropriate as part of the regeneration <u>to deliver optimised residential development on</u> and intensified use of the highly accessible land...	See above – Initial AM5.19 at Page 181 Plan Ref. 5.1.14	November 2021 – for submission
AM5.14	185	5.1.33	Opportunities exist to use tall buildings to enhance the image of Morden. <u>In appropriate locations, tall buildings can assist with reimagining the town centre and the creation of new character</u>	See above – Initial AM5.14 at Page 179 Plan Ref. 5.1.4	November 2021 – for submission

			<u>areas and features</u> , creating gateways to the <u>town</u> centre and landmarks in key locations that add character and legibility.		
AM5.28	185	5.1.34	The scale of existing buildings with <u>in</u> the suburban...	To correct a typographical error.	November 2021 – for submission
AM5.27	185	5.1.36	In accordance with policies D <u>512</u> .6 ‘Tall buildings’ and D <u>512</u> .5 ‘Managing heritage assets’, ...	See above – Initial AM5.27 at Page 185 Plan Ref. 5.1.33	November 2021 – for submission
AM5.20	185	5.1.36	...and where appropriate enhance the local <u>h</u> eritage <u>a</u> ssets.	See above – Initial AM5.20 at Page 181 Plan Ref. 5.1.14	November 2021 – for submission
AM5.6	185	5.1.37	Town centres are by definition where a range of different activities come together, which bring in a large number of people to work, live, shop and be entertained. <u>In this policy, when the term ‘town centre’ is used, it is generically referring to the town centre as an location or area but when the term is written as ‘Town Centre’, it is referring to the glossary definition and the area designated as ‘Town Centre’ on the Policies Map and the related matters addressed in Policy 13.5.</u>	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.29	186	5.1.37-40	This mix of uses is what makes town centres special however, today it is more important that town centres trade on their strengths and unique identities in a more sustainable manner to compete with, and complement, other town centres. In addition to providing a vibrant range of services, town centres need to supplement and enhance this offer. Analysis of the town centre undertaken by Hawkins Brown for the SDF, indicates that 65% of all businesses in the district centre are small independents, with more than half of all premises being retail shops. Pop-up street surveys and discussions with members of the local community indicate that future desired uses in the town centre include night-life, restaurants, cafes and cultural events, with a general wish for more diversity and a variety of independent shops. The Morden Regeneration Zone Site Allocation Mo4 includes a large part of the Morden District Centre, as identified in the	Deleted to avoid unnecessary duplication of matters that are adequately addressed in other Local Plan policies and to make the supporting text more concise.	November 2021 – for submission

			<p>London Plan. While the existing retail units are heavily utilised, consultation responses have highlighted that the current mix of retail does not meet the needs of the residents. 95% of respondents agreed that there is a need to provide more opportunities in Morden for the community to meet, socialise and make better use of their town centre through provision of attractive, safe and accessible public spaces and community, social, leisure and cultural facilities.</p> <p>96% of respondents also agree that the quantity and quality of commercial, residential and leisure uses should be improved in Morden, with a range of uses which are appropriate for a District Centre.</p>		
AM5.6	186	5.1.41	<p>Future development proposals in Morden <u>Town Centre and the Morden Regeneration Zone</u> should therefore respond to the needs of the residents, the daily users of the <u>town</u> centre, and those who pass through as commuters. This is essential to ensure that Morden <u>town centre</u> transforms into a place that people will want to visit as a destination. Proposed development in Morden <u>Town Centre and the Morden Regeneration Zone</u> should be of a flexible design to...</p>	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.6	186	5.1.42	<p>With the traditional high street retailers affected by online trading, Morden <u>Town Centre and the Morden Regeneration Zone</u> must look to new uses...</p>	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.6	187	5.1.43	<p>The provision of new employment opportunities in <u>Morden Town Centre and the Morden Regeneration Zone</u> the centre will also contribute to the economic sustainability of <u>the Morden area</u> as a whole, aligning with...</p>	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.27	187	5.1.43	<p>...aligning with the Economic Development policy Ee-7C13.1.</p>	See above – Initial AM5.27 at Page 185 Plan Ref. 5.1.33	November 2021 – for submission
AM5.27	187	5.1.44	<p>As detailed in policy Ee-7C13.5,...</p>	See above – Initial AM5.27 at Page 185 Plan Ref. 5.1.33	November 2021 – for submission
AM5.6	187	5.1.44	<p>..., <u>the regeneration within the Morden town-centre</u> Regeneration Zone will <u>introduce</u> changes with regards to the range of shops and ...</p>	See above – Initial AM5.6 at Page 176	November 2021 – for submission

AM5.6	187	5.1.45	..., is located less than 1 mile to the south of the <u>site-Morden Regeneration Zone</u> and...	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.30	187	5.1.45	...and will provides modern leisure facilities...	Grammar correction	November 2021 – for submission
AM5.31	187	5.1.45	The regeneration of the town centre provides an opportunity for improved linkages between the transport facilities and the parks <u>and leisure facilities</u> .	To improve clarity by listing all the potential local facilities that could benefit for improved linkages.	November 2021 – for submission
AM5.33	187	5.1.46	<u>As identified in the Infrastructure Delivery Plan 2021, the comprehensive regeneration of the Morden Regeneration Zone is likely to trigger the need for additional health infrastructure to meet local needs.</u> Morden Road Clinic has also been identified by the NHS (National Health Service) as a site allocation (Mo5)...	To improve clarity and consistency by referring to likely health infrastructure improvements in the policy supporting text, which is also referred to in the site allocation for the Morden Regeneration Zone. These modifications are proposed following a review due to the HUDU Stage 3 comments.	November 2021 – for submission
AM5.6	187	5.1.46	... elsewhere within <u>the</u> Morden <u>Regeneration Zone</u> to provide a...	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.32	187	5.1.46	<i>Move paragraph to be before paragraph 5.1.65.</i>	To improve clarity the is moved to be under the 'Delivering the Morden Regeneration Zone' subheading because	November 2021 – for submission

				it relates more to infrastructure delivery matters than town centre matters.	
AM5.34	187	5.1.47-49	<p>In accordance with the London Plan Policy SI2, all major developments, such as that proposed within the Morden Regeneration Zone, are expected to follow the energy hierarchy and associated targets to be net zero-carbon. Refer to the Sustainable Design and Construction policies CC8.10 – 15 for further details on reducing energy use, maximising low carbon energy generation and standards on sustainable design and construction.</p> <p>Decentralised energy is produced close to where it will be used and distributed by a network of underground pipes. We continue to explore how local heat and power can be generated and distributed around the borough using district heat networks.</p> <p>Further investigative work will be required alongside the redevelopment of Morden town centre, to ensure that the technical details, viability and phasing is further explored and aligned as part of the comprehensive regeneration. As detailed in Policy CC2.4, the Morden Regeneration Zone has been identified as a district heat network opportunity area and therefore further investigative work will be required as part of the plan-led approach to deliver the comprehensive regeneration within the Morden Regeneration Zone, to fully explore the technical and financial viability of a potential decentralised energy network.</p>	To improve clarity by avoiding unnecessary repetition of details in policy CC2.4 and to make the policy wording more concise.	November 2021 – for submission
AM5.11	188	5.1.50	<p>The <u>surrounding</u> Morden Neighbourhood</p> <p>It is important to enhance <u>Morden's the</u> suburban character <u>of the surrounding Morden Neighbourhood</u> whilst also encouraging development and regeneration in appropriate and highly accessible locations in the borough.</p>	See above – Initial AM5.11 at Page 178 Plan Ref.N5.1, part i.	November 2021 – for submission

AM5.6	188	5.1.50	While the central heart of Morden <u>Regeneration Zone</u> has been identified as...	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.35	188	5.1.51	...the Northern Line underground service provides that provides a direct link into...	To correct typographical error	November 2021 – for submission
AM5.6	188	5.1.52	It is therefore vital that Morden <u>Town Centre</u> is well connected to the surrounding neighbourhoods and beyond by a network of safe and convenient pedestrian and cycle routes.	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.6	188	5.1.53	The on-street cycle stands in Morden <u>Town Centre</u> are already well used and it is important that these facilities are retained and enhanced as part of any public realm improvement.	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.36	188	5.1.53	There is also a requirement for a covered, secure and high-quality cycle parking hub <u>as part of the delivery of the Morden Regeneration Zone</u> that will better support commuters and travellers to park their bicycles for longer periods.	To improve clarity of the preferred location of the hub.	November 2021 – for submission
AM5.6	189	5.1.57	Delivering <u>the Morden Regeneration Zone (Site Mo1)</u> There is an opportunity to regenerate <u>a part of</u> Morden town centre,...	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.10	189	5.1.58	...the Morden Regeneration Zone Site Allocation (Mo41) can be delivered.	See above – Initial AM5.10 at Page 177	November 2021 – for submission
AM5.7	189	5.1.60	...has strengthened the potential for Morden to be developed <u>regenerated</u> comprehensively.	See above – Initial AM5.7 at Page 176	November 2021 – for submission
AM5.37	190	5.1.62	...to deliver the regeneration of <u>the</u> Morden Regeneration Zone in...	To correct typographical error	November 2021 – for submission
AM5.38	190	5.1.64	The quantum and mix of affordable housing to be provided within each phase of development, will be an integral part of a scheme design and will be prepared in accordance with national, London-wide and local policy and guidance. A mechanism will be required to ensure that viability is kept under review.	Deleted to avoid unnecessary duplication of matters that are adequately addressed in other Local Plan policies and to make the	November 2021 – for submission

				supporting text more concise.	
AM5.10	191	Site Allocations map	<i>Update the site reference numbers (Mo1 and Mo4) on the map.</i>	See above – Initial AM5.10 at Page 177	November 2021 – for submission
AM5.10	192	Site Allocation Mo1	SITE Mo1Mo4 : Chaucer Centre Canterbury Road, Morden, SM4 6PX	See above – Initial AM5.10 at Page 177	November 2021 – for submission
AM5.10	192	Site Allocation Mo1, map	<i>Change the site reference number on the map from Mo1 to Mo4.</i>	See above – Initial AM5.10 at Page 177	November 2021 – for submission
AM5.39	193	Site Allocation Mo1, Design and accessibility guidance: text	We will require on site provision in accordance with the infrastructure policies and London Plan. <u>This site is an area</u> — rea identified as being deficient in access to children’s play space for ages 0-4 years.	To correct typographical error	November 2021 – for submission
AM5.40	193-212	All Site Allocations	Development proposals for this site must <u>refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</u> have regard to Merton’s Infrastructure Delivery Plan and Green Infrastructure Study 2020.	Wording was reviewed following the Stage 3 Local Plan submission received from HUDU and changes made for clarity on infrastructure requirements for each Site Allocation.	November 2021 – for submission
AM5.41	198-200	Site Allocation Mo3	<i>Site Allocation Mo3 is to be moved from the Morden Neighbourhood chapter to the Mitcham Neighbourhood chapter and inserted as the last site allocation in that chapter. For ease of reference, the reference number ‘Mo3’ it to be retained.</i>	To improve clarity and accuracy, site allocation is moved to the Mitcham Neighbourhood in which it is located however, for ease of reference, the number ‘Mo3’ will be retained. All the site reference numbers	November 2021 – for submission

				will be reviewed with the view of renumbering only at the final stage prior to adoption of the Local Plan. This proposed modification is also listed as AM4.22 for the Mitcham Neighbourhood chapter.	
AM5.10	201	Site Allocation Mo4	Site Mo4Mo1 : Morden Regeneration Zone	See above – Initial AM5.10 at Page 177	November 2021 – for submission
AM5.10	201	Site Allocation Mo4	<i>Change the site reference number on the map from Mo4 to Mo1.</i>	See above – Initial AM5.10 at Page 177	November 2021 – for submission
AM5.20	202	Site Allocation Mo4, Existing uses	A mixture of t T own e C entre t T ype u U ses, including retail, office,...	See above – Initial AM5.20 at Page 181 Plan Ref. 5.1.14	November 2021 – for submission
AM5.6	202	Site Allocation Mo4, Morden Regeneration Zone site vision: text	The regeneration vision seeks to take the opportunity to enable large-scale development in <u>the Morden Regeneration Zone</u> town centre , which will...	See above – Initial AM5.6 at Page 176	November 2021 – for submission
AM5.42	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 3	Transforming the appearance, and user experience <u>and air quality</u> of Morden <u>Town Centre</u> by relocating the bus stands <u>outside the Morden underground station</u> away from their current location and creating to help create healthier streets and a welcoming public space outside the Morden underground station entrance.	To improve clarity and consistency of the wording where these matters are addressed in the text for policy Morden N5.1 b.	November 2021 – for submission
AM5.6	202	Site Allocation Mo4, Morden Regeneration	A range of appropriate public spaces and streets <u>within the Morden Regeneration Zone</u> that enhance accessibility... through the Wider Morden Town Centre Area to the surrounding area , (MM5.1) with pedestrians and cyclists as the priority.	See above – Initial AM5.6 at Page 176	November 2021 – for submission

		Zone site vision: 4			
AM5.11	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 4	...the creation of green links through the Wider Morden Town Centre Area <u>Morden Regeneration Zone</u> , (MM5.1) and its surrounding <u>connecting to the</u> open spaces <u>in the surrounding Morden Neighbourhood</u> .	See above – Initial AM5.11 at Page 178 Plan Ref.N5.1, part i.	November 2021 – for submission
AM5.43	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 5	Incorporating green infrastructure and where appropriate, contributing to that contributes to improved drainage, air quality <u>and</u> the creation of green links through ...	To improve clarity and consistency of the wording where these matters are addressed in the text for policy Morden N5.1 d.	November 2021 – for submission
AM5.44	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 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	To improve clarity and consistency of the wording where these matters are addressed in the text for policy Morden N5.1 f.	November 2021 – for submission
AM5.20	203	Site Allocation Mo4, Design and accessibility guidance	Development proposals will have to conserve and where appropriate, enhance the local h Heritage a Assets, and ...	See above – Initial AM5.20 at Page 181 Plan Ref. 5.1.14	November 2021 – for submission
AM5.11	203	Site Allocation Mo4, Design and accessibility guidance	- high quality pedestrian and cycle routes that link to the wider suburban <u>surrounding Morden Neighbourhoods</u>	See above – Initial AM5.11 at Page 178 Plan Ref.N5.1, part i.	November 2021 – for submission
AM5.45	203	Site Allocation Mo4, Design and accessibility guidance	Development proposals need to include a healthy, accessible public realm that will also deliver air quality improvements. Proposals therefore need to provide a high-quality public realm outside the underground station. Proposals needs to include: - <u>high-quality public realm outside the underground station</u> - suitable alternative bus standing and stopping facilities; ...	To improve clarity	November 2021 – for submission

AM5.46	204	Site Allocation Mo4, Infrastructure Requirements	We will require evidence that the developer has engaged with London Underground, <u>to be</u> submitted with any planning application for the site.	To correct typographical error	November 2021 – for submission
AM5.47	204	Site Allocation Mo4, Infrastructure Requirements	The developer will need to engage with TfL to provide suitable alternative bus stand and bus stop facilities. <u>Where appropriate, development proposals may be required to make financial contributions towards the delivery of these facilities, in the form of planning obligations.</u>	To improve clarity by highlighting a possibility with the regeneration of such a large site.	November 2021 – for submission
AM5.48	207	Site Allocation Mo5, Infrastructure Requirements	<u>Development proposals will need to demonstrate that clinical capacity will be maintained for residents during the redevelopment of this site.</u>	To improve clarity and ensure no loss of clinical capacity during the redevelopment of the site. Change made following a review due to HUDU Stage 3 comments.	November 2021 – for submission
AM6.1	220	Raynes Park Policy N6.1, part f.	In the long term, work with <u>Network Rail Crossrail 2</u> and the local community to ensure the benefits arising <u>from</u> its investment are realised, that new structures are sensitively designed and compliment the wider residential area and that disruption is kept to a minimum.	Factual accuracy as Crossrail2 is unfunded and won't be delivered within the lifetime of this local plan.	November 2021 – for submission
AM6.2	220	Raynes Park Policy N6.1, part h.	Optimise land use by providing new homes above shops and other business premises, for example at <u>Wimbledon Chase and Shannon Corner</u> , where these can be sited and designed to minimise air and noise pollution for new residents.	To improve clarity and accuracy, references to the Wimbledon Chase area have been removed from the Raynes Park Policy N6.1 and inserted in the Wimbledon Policy N9.1, as the Wimbledon Society has pointed out in their Stage 3	November 2021 – for submission

				response, Wimbledon Chase in within the Wimbledon Neighbourhood.	
AM6.2	220	Raynes Park Policy N6.1, part j.	Supporting the 20 minute neighbourhood approach by supporting shopfront, public realm and street scene improvements and maintaining the day-to-day shopping and other services at Motspur Park and Wimbledon Chase .	See above – Initial AM6.2 at Page 220 Plan Ref. Policy N6.1, part h.	November 2021 – for submission
AM6.2	220	Raynes Park Policy N6.1, part l.	Supporting attractive, accessible local parades and neighbourhoods including step-free access at Motspur Park and Raynes Park Wimbledon Chase stations	See above – Initial AM6.2 at Page 220 Plan Ref. Policy N6.1, part h.	November 2021 – for submission
AM6.2	224	6.1.12	As set out in the Good Growth chapter of this Local Plan, Wimbledon Chase and Raynes Park and Motspur Park will be supported to be 20-minute neighbourhoods. Wimbledon Chase Neighbourhood Parade is served by a rail station but could benefit from environmental improvements. Transport improvements for the Wimbledon Chase and Motspur Park areas have <u>has</u> already been identified, including provision of better facilities for buses, pedestrians and cyclists, with planting to improve the quality of the environment. We will continue to lobby for step free access to Motspur Park and Raynes Park and Wimbledon Chase train stations so that all residents can make equal and effective use of their local station.	See above – Initial AM6.2 at Page 220 Plan Ref. Policy N6.1, part h.	November 2021 – for submission
AM6.3	224	6.1.13	The suburban neighbourhoods within the neighbourhoods will be conserved and enhanced by ensuring that new development respects local character and amenity, and where appropriate <u>conserves</u> historic value.	To improve clarity that sites and areas of historic values should be conserved, not all sites.	November 2021 – for submission


AM6.1	224	6.1.14	Outside this Local Plan period, in the long term investment in Crossrail 2 could transform Raynes Park and Motspur Park local town centres However, at this stage it is likely that Crossrail 2 will not be completed much prior to 2040, outside the lifetime of this Local Plan. In their consultation response to this Local Plan, Transport for London confirmed that Crossrail2 safeguarding directions will be revised to safeguard the latest proposed route. At the time of writing (June November 2021) no safeguarding directions exist for the Crossrail2 route for Raynes Park and Motspur Park.	See above – Initial AM6.1 at Page 220 Plan Ref. N6.1, part f.	November 2021 – for submission
AM6.4	226	Site allocation RP1, Site owner	National Health Service (NHS).	Factual accuracy and in response to representations	November 2021 – for submission
AM6.5	227-247	All Site Allocations: Infrastructure Requirements:	<i>Insert this sentence at the start of the 'Infrastructure Requirements' part of all Raynes Park Neighbourhood site allocations:</i> <u>Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</u>	Wording was reviewed following the Stage 3 Local Plan submission received from HUDU and changes made for clarity on infrastructure requirements for each Site Allocation.	November 2021 – for submission
AM6.6	229	Site Allocation RP2, Infrastructure Requirements	...proposals to alleviate this deficiency in accordance with the Green Infrastructure policies. <u>Development proposal should aim to restore the Pyl Brook, with natural banks and buffer habitat to create a wide corridor, facilitating biodiversity net gain and providing a significant improvement to the green corridor.</u> This site is in an area identified as being deficient in access to public open space. The Council will...	Following comments from Environment Agency. Changes will ensure that development near the Pyl Brook have a positive impact and improve the biodiversity of the river.	November 2021 – for submission
AM6.7	232	Site Allocation RP3, Design	Development of the site presents an opportunity to improve the currently overgrown and inaccessible <u>Pyl Brook area</u> on the	To improve clarify that improvements to the area around Pyl	November 2021 – for submission

		and accessibility guidance	northern boundary of the site (Pyt Brook) <u>and provide public access for pedestrians and cyclists.</u>	Brook should allow public access following comments from Merton Residents Transport Group.	
AM6.8	233	Site Allocation RP3, Infrastructure Requirements	The site is close to the A3 which forms part of the Transport for London Road Network (LTRN) – no new access or servicing should take place from the A3 advice from TfL.	Repetition deleted.	November 2021 – for submission
AM6.9	233	Site Allocation RP3, Infrastructure Requirements	Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply <u>network infrastructure, but do not have concerns relating to the</u> and wastewater network infrastructure.	Changed to ensure Thames Water infrastructure requirements are made clear for future development of the site.	November 2021 – for submission
AM6.10	233	Site Allocation RP3, Impacts an Archaeological Priority Area	The site is within an Archaeological Priority Zone for West Barnes Farm, a Medieval, probably moated, ‘Grange’ belonging to Merton Priory <u>No</u> . To the north is a Tier 2 Archaeological Priority <u>Area</u>	Factual correction	November 2021 – for submission
AM6.11	234	Site Allocation RP4	80-86 Bushey Road, Raynes Park, SW20 0JQ-0WJ	Factual correction following request from the site owner.	November 2021 – for submission
AM6.12	234	Site Allocation RP4	The site consists of large-scale retail sheds ranging between two and five storeys in height <u>and</u> open parking areas. and a demolish.	Correction to unfinished sentence.	November 2021 – for submission
AM6.13	236	Site Allocation RP4, Infrastructure Requirements	<u>Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing</u>	Added to ensure Thames Water infrastructure requirements are made clear for future development of the site.	November 2021 – for submission

			<u>plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.</u>		
AM6.14	236	Site Allocation RP4, Infrastructure Requirements	The site is close to the A3 which forms part of the Transport for London Road Network no new access or servicing should take place from the A3, advice from TfL.	Delete duplication	November 2021 – for submission
AM6.15	236	Site Allocation RP4, Public Transport Accessibility Location (PTAL)	<u>The site ranges from</u> PTAL 1, very poor access to public transport <u>to PTAL 3, moderate access to public transport.</u>	To correct a factual error.	November 2021 – for submission
AM6.16	238	Site Allocation RP5, Site allocation	The site can be found in is designated <u>as</u> open space <u>and contains with</u> sport and recreation use that are compatible with <u>its</u> open space designation.	To improve clarity.	November 2021 – for submission
AM6.17	238	Site Allocation RP5, Infrastructure Requirements	This site is in an area identified as being deficient in access to public open space. The council will require <u>major development</u> proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site <u>where this is suitable and viable</u> , in accordance with the Green Infrastructure policies.	To improve accuracy with regards to the requirements in part d. of policy O15.2 'Open Space and Green Infrastructure'.	November 2021 – for submission
AM6.18	244	Site Allocation RP7, Design and accessibility guidance	The scheme is now being phased and the business floorspace and kiss and ride have <u>commenced</u> been implemented .	For clarity and correctness.	November 2021 – for submission
AM7.1	254	Character: South Wimbledon	[Image at the top of page 254 showing the High Path estate regeneration has been replaced.]	For accuracy and to reflect the approved planning application.	November 2021 – for submission

AM7.2	255	South Wimbledon Policy N7.1, part c	Supporting developments and occupiers that help improve or strengthen local character, reflecting the area's rich architectural history or providing a modern interpretation <u>which respects heritage assets</u> ;	For clarity on heritage aspects.	November 2021 – for submission
AM7.3	255	South Wimbledon Policy N7.1, part d	Support developments <u>in the Local Centre</u> that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;	For clarity and to reflect the original policy intention.	November 2021 – for submission
AM7.4	255	South Wimbledon Policy N7.1, part g	Protecting and enhancing the public open space at Nelson Gardens <u>and Haydons Road Recreation Ground</u> and improving links to Abbey Rec, Wandle Park and other nearby open spaces;	To add clarity for this site.	November 2021 – for submission
AM7.5	255	South Wimbledon Policy N7.1, part h	Support <u>well designed</u> development commensurate with the excellent public transport access of the area;	To align with the design policies.	November 2021 – for submission
AM7.6	255	South Wimbledon Policy N7.1, part j	<u>Integrate Work with</u> the regeneration phases being delivered on the High Path estate over the next 10-15 years, guided by the Estates Local Plan <u>to ensure the development enhances the local environment</u> ; this includes the proposed public park at High Path;	For accuracy and clarity	November 2021 – for submission
AM7.7	255	South Wimbledon Policy N7.1, part k	Supporting the redevelopment at South Wimbledon station (<u>Site Allocation Wi8</u>) which respects and enhances the Grade II listed building and <u>other heritage assets within the area, delivers a range of benefits including encouraging a public space, cycle parking, improved station facilities</u> and secondary pedestrian entrance to the underground station off the busy main roads.	To align with details in the site allocation.	November 2021 – for submission

AM7.8	257	map	<p>Local Centre boundary for South Wimbledon:</p>  <p>Legend Local Centre</p> <p>merlon</p>	Map to be deleted to avoid duplication of the information that is also on the map added as part of the proposed modification to paragraph 7.1.14.	November 2021 – for submission
-------	-----	-----	--	---	--------------------------------

AM7.9	259	7.1.14	<p><i>Add sentence at the end of the paragraph</i></p> <p><u>The map below illustrates the policies map designations: the new Local Centre boundary for South Wimbledon the site allocation Wi8 South Wimbledon Station (details contained Chapter 09 Wimbledon) and the High Path estate regeneration boundary as defined in Merton’s Estates Local Boundary 2018.</u></p> <p><u>Summary of Sites and Estate Regeneration relating to South Wimbledon:</u></p> 	To replace the map that was deleted from page 257. Replaced for correctness and to make reference to the Site Allocation information for Wi8, for clarity.	November 2021 – for submission
AM9.1	267	Wimbledon Policy N9.1 part e	Respecting views from Wimbledon Hill through the town centre and beyond, with taller developments <u>set at St George’s Road, Hartfield Road and Broadway East</u> , away from the historic core located around the station. St George’s Road, Hartfield Road and Broadway East.	To improve clarity and address Wimbledon Society Planning Committee representation on the matter.	November 2021 – for submission
AM9.2	268	Wimbledon Policy N9.1, part j.	Securing <u>improvements to public transport and</u> investment in Wimbledon station to improve the passenger experience....	To clarify that improvements to public transport	November 2021 – for submission

				services will be sought alongside improvements to the station.	
AM9.3	268	Wimbledon Policy 9.1, part m	Supporting environmental improvements and maintaining the day-to-day shopping and other services at <u>Wimbledon Chase and</u> Arthur Road Local Centre;	To improve clarity and accuracy, references to the Wimbledon Chase area have been removed from the Raynes Park Policy N6.1 and inserted in the Wimbledon Policy N9.1, as the Wimbledon Society has pointed out in their Stage 3 response, Wimbledon Chase in within the Wimbledon Neighbourhood.	November 2021 – for submission
AM9.4	268	Wimbledon Policy 9.1, part o	Conserving and enhancing the quality of neighbourhoods within the neighbourhoods through Conservation Area character protection, and by supporting incremental development that respects the character and heritage assets within the area;	Change made for accuracy and clarity. Development in conservation areas does not need to be incremental.	November 2021 – for submission
AM9.3	269	Wimbledon Policy 9.1, new part below q	<u>Supporting accessible local services including step-free access at Haydons Road and Wimbledon Chase stations.</u>	See above – Initial AM9.3 at Page 268 Plan Ref. Policy 9.1, part m	November 2021 – for submission

AM9.5	273	9.1.24	Wimbledon Village is a Local Centre with a unique and attractive environment: high quality physical fabric and landscaping, protected by Conservation Area designations. It has a rich heritage and period buildings, a golf_horse_riding trails, books fairs and horse and dog show, with sett amongst the backdrop of Wimbledon Common nearby .	For clarity, as recommended by the Wimbledon Society	November 2021 – for submission
AM9.3	275	9.1.33	The wider Wimbledon area is relatively compact and close to other neighbourhoods in Colliers Wood, South Wimbledon, Wimbledon Chase , Southfields, Tooting, Raynes Park, Morden, Kingston and beyond. We will encourage proposals that enhance walking and cycling across south London, requiring larges sites to be permeable and support public access.	See above – Initial AM9.3 at Page 268 Plan Ref. Policy 9.1, part m	November 2021 – for submission
AM9.5a	275	New para below 9.1.33	<u>Wimbledon Chase Neighbourhood Parade is served by a rail station but could benefit from environmental improvements. Transport improvements for the Wimbledon Chase area have already been identified, including provision of better facilities for buses, pedestrians and cyclists, with planting to improve the quality of the environment. We will continue to lobby for step free access to Wimbledon Chase train station so that all residents can make equal and effective use of their local station.</u>		March 2022 – response to Inspectors' preliminary matters
AM9.6	276	Wimbledon, SITE ALLOCATIONS, text	Site allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities. Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site allocations will be determined against planning polices (including the London Plan). <u>Identifying sites for a specific land use or type of development helps give</u>	To improve clarity	November 2021 – for submission

			<u>certainty to what is likely to happen in that neighbourhood and helps provide homes, business space, town centre uses, infrastructure, community facilities, sports, parks and open spaces and other types of development to help meet the borough's and London's needs. These sites are contained in the development plan as site allocations.</u>		
AM9.7	278-317	All Site Allocations: Infrastructure Requirements:	Development proposals for this site must <u>refer to the have regard to Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</u> <i>For site Wi2 and Wi13 the above sentence is inserted as a new sentence at the start of the Infrastructure Requirements part</i>	Wording was reviewed following the Stage 3 Local Plan submission received from HUDU and changes made for clarity on infrastructure requirements for each Site Allocation.	November 2021 – for submission
AM9.8	283	Site Allocation Wi3, Site description	The AELTC have commenced the preparation of an <u>updated masterplan-new masterplan</u> to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course. <u>In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council.</u>	To improve accuracy	November 2021 – for submission
AM9.9	283	Site Allocation Wi3, Site area	<u>17.83-44</u> hectares	Factual correction to improve accuracy.	November 2021 – for submission
AM9.10	283	Site Allocation Wi3, Existing use	Wimbledon Park Golf course is currently an 18-hole golf course with club house and maintenance facilities <u>with no public access other than in line with golf club membership rules.</u> This use will cease from January 2022	To improve accuracy.	November 2021 – for submission
AM9.11	283	Site Allocation Wi3, Design and accessibility guidance:	...the opportunity to host more of the pre-Championship activities within Merton <u>including the qualifying event.</u>	To improve accuracy.	November 2021 – for submission
AM9.12	284	Site Allocation Wi3, Design and accessibility guidance:	Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian <u>and cycle</u> access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes	To improve clarity and accuracy.	November 2021 – for submission

			the opportunity to address the reasons why Wimbledon Park is on Historic England’s “heritage at risk” register by AELTC (the landowner of the former golf course landowner) working with other landowners Merton and Wandsworth Councils...		
AM9.13	284	Site Allocation Wi3, Infrastructure requirements	<i>Add this paragraph at the start of ‘Infrastructure requirements’:</i> <u>The AELTC site is used in a highly intensive manner, usually for less than two months per year, and relatively little outside the tennis grass court season given its size and scale. Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of any unusual usage patterns prevalent at the time and predicted for its future use.</u>	To improve accuracy in response to representations from the AELTC and to reflect information consulted on at Stage 2	November 2021 – for submission
AM9.14	284	Site Allocation Wi3, Impacts a Conservation Area.	Yes. The north end of the <u>existing tennis</u> site sits within Bathgate Road conservation area. The whole <u>A part</u> of the site is within an a Archaeological p Priority zone Area. Wimbledon <u>North</u> conservation area <u>covers</u> lies to the west of the site (<u>Wimbledon Park</u>) <u>and lies to the south of the site.</u>	To improve clarity and accuracy.	November 2021 – for submission
AM9.15	292	Site Allocation Wi7, Site description	...and pedestrians via Ravensbury Terrace through a site known as Haslemere Industrial Estate, which... ...shared with the development at 12a Ravensbury Terrace and through Haslemere industrial estate.	To improve clarity and accuracy.	November 2021 – for submission
AM9.16	293	Site Allocation Wi7, Site description	<i>Add this sentence at the end of ‘Site description’:</i> <u>In May 2020 a planning application (reference 21/P1780) was submitted for the redevelopment of the site to provide 96 homes and 880 square metres of commercial floorspace.</u>	To improve accuracy	November 2021 – for submission
AM9.17	293	Site Allocation Wi7, Infrastructure requirements	This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. <u>Proposals will be required to explore the opportunity to improve pedestrian and cycle access between the Wandle Trail and Durnsford Recreation Ground, in accordance with the active travel policies.</u>	To improve clarity to ensure future development considers access with the Wandle Trail and nearby Durnsford Recreation Ground, following the Wandle Valley Forum Stage 3 submission.	November 2021 – for submission

AM9.18	293	Site Allocation Wi7, Infrastructure Requirements	<p><u>Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.</u></p> <p>Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</p>	Changed to ensure Thames Water infrastructure requirements are made clear for future development of the site.	November 2021 – for submission
AM9.19	298	Site Allocation Wi9, Design and accessibility guidance:	Development of the site provide an opportunity for a co-ordinated approach to design and delivery from four sites proposed in this plan: Wi9, Wi10 <u>and</u> Wi13 <u>and</u> Wi14	To improve clarity and accuracy.	November 2021 – for submission
AM9.20	302	Site Allocation Wi10, Design and accessibility guidance:	Opportunity for a co-ordinated approach to design and development delivery with the following site allocations - Wi9, Wi10, <u>and</u> Wi13 <u>and</u> Wi14 as set out in the London Plan.	To improve clarity and accuracy.	November 2021 – for submission

AM9.21	302	Site Allocation Wi10, Impacts an Archaeological Priority Area:	Within the Wimbledon Village Archaeological Priority Zone <u>No</u>	Factual correction	November 2021 – for submission
AM9.22	303	Site Allocation Wi11, Site description:	To the north of the site and on the other side of The Broadway lies South Park Gardens <u>The Broadway</u> Conservation Area with multiple...	To improve clarity and accuracy	November 2021 – for submission
AM9.23	304	Site Allocation Wi11, Site allocation:	A mix of Town Centre Type U <u>uses</u> including retail, cafes and restaurants <u>pub or drinking establishment, financial and professional services, assembly and leisure, hotels and offices</u> with the re-provision of public realm. The priority for the site should be T <u>own C</u> e <u>ntre T</u> y <u>pe Uu<u>ses</u>. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability.</u>	To improve clarity and accuracy.	November 2021 – for submission
AM9.24	308	Site Allocation Wi12, Infrastructure requirements	The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network. <u>This site is in close proximity to National Grid infrastructure 33Kv Underground Cable route Earlsfield Rail Feeders 427, 440 & 443 Section 3 and 33Kv Underground Cable route Wimbledon 33Kv D S/S Electrical Substation Wimbledon 132KV. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.</u>	To ensure that it is clear that nearby National Grid assets need to be protected. Wording added at the request of National Grid, following their Stage 3 Local Plan submission.	November 2021 – for submission

AM9.25	310	Site Allocation Wi13, Design and accessibility guidance:	Opportunity for a co-ordinated approach to design and delivery from four sites proposed in this plan: Wi9, Wi10 <u>and</u> Wi13 <u>and</u> <u>Wi14</u> .	To improve clarity and accuracy.	November 2021 – for submission
AM9.26	311	Site Allocation Wi13, Impacts an Archaeological Priority Area:	Within the Wimbledon Village Archaeological Priority Zone <u>No</u>	Factual correction	November 2021 – for submission
AM9.27	317	Site Allocation Wi16, Existing uses	a mixture of town centre uses – retail, restaurants, financial and professional services and <u>ancillary</u> offices	To improve clarity and accuracy.	November 2021 – for submission
AM9.28	317	Site Allocation Wi16, Site allocation	A mixture of T <u>town C</u> entre <u>T</u> types <u>U</u> uses such as community (including health <u>and wellbeing /day centre</u>), retail, restaurants and <u>cafes take-away</u> , financial and professional services, <u>leisure</u> , offices, hotel, residential <u>and last mile distribution</u> .	To improve clarity and following comments from representors including Romulus (site owners)	November 2021 – for submission
AM9.29	317	Site Allocation Wi16, Site deliverability	0-5 years (<u>phase 1</u>) 5-10 years (<u>phase 2</u>)	To improve clarity and following comments from representors including Romulus (site owners)	November 2021 – for submission
AM9.30	317	Site Allocation Wi16, Design and accessibility guidance:	The site provides an excellent opportunity for the <u>repurposing</u> <u>and</u> redevelopment of a substantial brownfield site within the heart of the town centre.	To improve clarity following comments from the Wimbledon Society and Romulus (the site owner)	November 2021 – for submission
AM9.31	317	Site Allocation Wi16, Design and accessibility guidance	Development proposals must have regard to the design-led Future Wimbledon SPD (Supplementary Planning Document), <u>the Broadway Conservation Area design guide and design considerations relating to the two Grade II listed buildings on site</u> .	To improve clarity following comments from the Wimbledon Society	November 2021 – for submission

AM10.1	320	Policy HW10.1 Health (including mental health) and Wellbeing, part a.	Working with strategic partners such as NHS (National Health Service) England, Clinical Commissioning Groups (CCG) and Merton's Health and Wellbeing Boards in <u>improving health and wellbeing</u> tackling health inequalities,...	To improve clarity following representations from the Healthy Urban Development Unit	November 2021 – for submission
AM10.2	320	Policy HW10.1 Health (including mental health) and Wellbeing, part f.	...adopt active aging approaches and improve access to ¹ green infrastructure. ¹ Including parks, open spaces, playing fields, woodlands – and also street trees, allotments, private gardens, green roofs	For clarity of what is meant by green infrastructure.	November 2021 – for submission
AM10.3	320	Policy HW10.1 Health (including mental health) and Wellbeing, part h.	Improving the public realm in accordance with, <u>the Transport for London (TfL) Healthy Streets Approach</u> and, <u>Sport England /Public Health England, Active Design principles 10 principles and guides.</u> to To provide improved network of safe and convenient pedestrian and cycle routes that enable healthy and active travel choices, especially in areas identified as Air Quality Focus Areas in Merton's Air Quality Action Plan.	To improve clarity following comments from the Healthy Urban Development Unit and Sport England	November 2021 – for submission
AM10.4	320	Policy HW10.1 Health (including mental health) and Wellbeing, part i.	Ensuring that our neighbourhoods are inclusive and accessible for all (<u>including disabled people²</u>) and encourages social interaction. ² <u>Definition of disability under the Equality Act 2010</u>	To improve clarity following comments from Merton Centre for Independent Living	November 2021 – for submission
AM10.5	321	10.1.1	The coronavirus (COVID-19) pandemic has been is described as a watershed moment for inequalities. Covid-19 has put the national focus on inequalities, especially the link between health and income. It has deeply is exposed <u>exposing</u> known inequalities and will further no doubt <u>further</u> compound them. The impact on mental health could lead to a longer-term erosion of people's physical health, affecting people who have not previously experienced <u>d</u> poor mental health.	To reflect the current situation with Covid 19 and grammar corrections.	November 2021 – for submission

AM10.6	321	10.1.3	During the early months of the The pandemic visits to parks and public green spaces increased across London. The pandemic has exposed the benefit of access to green spaces and nature for physical activity and play, mental wellbeing and mental resilience. Several surveys carried out on people with lung condition found that around 20% reported improvement to their conditions. This is contributed <u>contributes</u> to the short-term reductions in levels and exposure of air pollution (for example PM25 and NO2) during lockdown and social distancing measures.	To reflect the current situation with Covid 19	November 2021 – for submission
AM10.7	323	10.1.11	Following a call for evidence <u>from</u> the Royal Town Planning Institute (RTPI) in September 2019, this...	Grammar correction	November 2021 – for submission
AM10.8	323	10.1.13	...local authorities should consider opportunities <u>to support for</u> people to live healthy lifestyles including planning ...	Grammar correction	November 2021 – for submission
AM10.9	324	10.1.15	The <u>A</u> 20-minute neighbourhood is about creating attractive, interesting, safe walkable environments.	Grammar correction	November 2021 – for submission
AM10.10	324	10.1.17	Active Design <u>10 principles and guides</u>	Correct title of active design	November 2021 – for submission
AM10.11	324	10.1.17	...including P15.10 <i>Improving Air Quality and Minimising Pollution</i> . It <u>which</u> seeks to ensure that local environmental impacts...	Grammar correction	November 2021 – for submission
AM10.12	326	10.1.24	<u>According to Merton's Strategic Housing Needs Assessment 2019 and based on population projections the GLA (Greater London Authority) Population and Household Projections (2016), by 2030 2035</u> the number of people aged over 75 <u>85</u> is predicted to increase by 11% <u>52%</u> in Merton.	Updated to the most recent available data to improve accuracy.	November 2021 – for submission
AM10.13	327	10.1.27	Dementia friendly design approaches take existing design best practices and either adapt or strengthens them with a focus on the needs of people living with dementia. These approaches aim to create inclusive environments/neighbourhoods will help reduce stigma and supported people living with dementia, other health conditions such as <u>and many other impairments including people with physical and sensory impairments, neurodiverse</u>	Amended following comments and further engagement with Merton CIL	November 2021 – for submission

			<u>people (including autism), people with learning disabilities and mental health service users.</u> Inclusive neighbourhoods go beyond providing physical access and creates solutions that work better for everyone; ensuring that everyone can equally; <u>and</u> confidently and independently use buildings, transport and public spaces.		
AM10.14	327	10.1.28	There are <u>Several</u> practical guides that provide to help developers <u>s to</u> incorporate dementia friendly approaches.	Grammar correction	November 2021 – for submission
AM10.15	327	10.1.29	Another useful tool for developers is <u>'The Place Standard' toolkit.</u> This tool was developed by the <u>The</u> Scottish Government, NHS (National Health Service) Health Scotland, Architecture and Design Scotland <u>developed this tool.</u> It is used by m <u>M</u> any local authorities <u>use it</u> as a framework for consultation on development, however it can be used by developers to assets proposals.	To improve clarity	November 2021 – for submission
AM10.16	329	Policy HW10.2 Delivering healthy places, part a. iii	Encourage opportunities for food growing such as allotments, community gardens <u>and orchards</u> and other innovative food growing spaces as part of development proposals.	Following comments from the Woodland Trust	November 2021 – for submission
AM10.17	329	10.2.3	We will look to create and promote healthy food environment in Merton by increasing the availability of healthy food and limiting unhealthy options. As such, and i <u>n</u> line with Policy DM TC 7.11 when considering new development proposals for fast food, takeaways located 400 metres from the exit and entrance of an existing or proposed school. T <u>h</u> e council will have regard to...	Grammar amendment	November 2021 – for submission
AM11.1	333	Policy H11.1 Housing choice, part d.	<u>Provide step-free access and adapted housing i</u> n accordance with London Plan Policy D7 (Accessible housing) and <u>Building Regulation Requirement M4(2) and M(4.3) and this Local Plan's policy D12.3 'Ensuring high quality designs in all developments', 90% of all new build housing is required to be 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings.</u>	To address consultee Clarion Housing Group's response and link it with Local Plan policy D12.3(l) and justification 12.3.2.	November 2021 – for submission
AM11.2	334	Policy H11.1 Housing choice, part f.	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 and</u> provided all provision is on-site without public subsidy:	To address GLA response and improve clarity.	November 2021 – for submission

AM11.2a	338	11.1.9	We seek 10% of all housing on sites of 10 homes and above to be affordable home ownership (as set out in the NPPF). However, given that the main analysis of affordable need also showed a notable level of need, involving households who cannot afford anything in the market without subsidy, there is no basis to increase the provision of affordable home ownership above the 10% figure. As exceeding this figure would impact the delivery of affordable housing of those in a more acute need.	To improve consistency and clarity. (March 2022)	In response to Inspectors preliminary letter, March 2022
AM11.3	345	New paragraph below 11.1.38	<u>Estate regeneration that involves the loss and replacement of affordable housing should deliver an uplift in affordable housing wherever possible. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.</u>	To address Clarion Housing Group response and improve clarity	November 2021 – for submission
AM11.4	346	Policy H11.2 Housing provision, text	We will aim to deliver a minimum of 11,732 <u>11,576</u> additional homes for the period 2021/22 – 2035/36. This will be achieved by:- -	Merton Local Plan target updated to reflect the latest supply position and demonstration that Merton can deliver against the proposed stepped target. The change in these figures is because the “shortfall” in delivery for 2020/21 were estimated at the time of Stage 3 publication. Since then, the completions for 2020/21 have been confirmed and the “shortfall” from the 918 London Plan target has been	November 2021 – for submission <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>

				adjusted to reflect this.	
AM11.4	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 11,732 11,576 additional homes for the period 2021/22 – 2035/36 will come forward in Merton by: ...	See above	November 2021 – for submission <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>
AM11.5	346	Policy H11.2 Housing provision, part e.	Supporting the redevelopment of poor quality existing housing <u>and proposals to improve the quality of existing homes</u> that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of housing to temporary sleeping accommodation on a permanent basis.	To address Clarion Housing Group response and improve clarity.	November 2021 – for submission
AM11.6	347	11.2.1	<ul style="list-style-type: none"> Bringing forward housing capacity through regeneration, including Morden town centre <u>and the Merton Opportunity Area</u>. Prioritising the development of previously developed land and ensuring it is used efficiently. Development of sites identified in Merton's Housing Trajectory. Development of windfall sites. <u>Intensification of housing as part of estate regeneration proposals.</u> ... 	To address Clarion Housing Group response and improve clarity	November 2021 – for submission
AM11.7	348	11.2.4	... 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, <u>in consultation with the GLA, and should take into account any additional capacity that could be delivered as a</u>	To address GLA response by clarifying Merton's position concerning additional housing	November 2021 – for submission

		<p><u>result of any committed transport infrastructure improvements</u>, 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.</p> <p><u>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.</u></p> <p><u>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. (Now moved to Main Modification MM 1.1)</u></p> <p><u>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.</u></p>	<p>delivery beyond 2029.</p>	
--	--	--	------------------------------	--

AM11.8	348	11.2.7 and Figure 4.2.2	<p>As Figure 4.2.2 below indicates Merton’s annual housing target will be set at <u>775750</u> homes per annum for the period 2021/22, <u>increasing to 800 for the period 2022/23</u> – 2023/24, and then increase to <u>1,0801,110</u> for the period 2024/25-<u>2025/26</u>, and then <u>1,180 for the period 2026/27-2028/29</u>. <u>2026/27</u>, then further increase to <u>1,350 for the period 2027/28</u> – <u>2028/29</u>. This ensures that the total local need in the 2017 SHLAA of 7,344 new homes from 2021/22-2028/29 plus the shortfall of 766 new homes delivered against the London Plan target from 2019/20 and 2020/21 is met.</p> <table border="1" data-bbox="656 501 1576 847"> <thead> <tr> <th></th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>Shortfall from 2019/20 and 2020/21</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Merton Local Plan target</td> <td>775</td> <td>775</td> <td>775</td> <td>1,080</td> <td>1,080</td> <td>1,080</td> <td>1,350</td> <td>1,350</td> <td></td> <td>8265</td> </tr> <tr> <td>London Plan target</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>766</td> <td>8,110</td> </tr> </tbody> </table> <p>(Now moved to Main Modifications MM1.1)</p>		2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Shortfall from 2019/20 and 2020/21	Total	Merton Local Plan target	775	775	775	1,080	1,080	1,080	1,350	1,350		8265	London Plan target	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	766	8,110	<p>Merton Local Plan target updated to reflect the latest supply position and demonstration that Merton can deliver against the proposed stepped target. The proposed additional text in para 11.2.7 explains how the “shortfall” for 2019/20 and 2020/21 has been added to the London Plan need for the period 2021/22 to 2028/29. The figures for the Merton Local Plan target in the table of para 11.2.7 have been updated to reflect the latest supply position.</p>	<p>November 2021 – for submission</p> <p>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</p>
	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Shortfall from 2019/20 and 2020/21	Total																												
Merton Local Plan target	775	775	775	1,080	1,080	1,080	1,350	1,350		8265																												
London Plan target	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	766	8,110																												
AM11.9	348	11.2.8	<p>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 <u>and includes the rolling forward of the small sites target beyond 2029</u>. ...</p> <p>(Now moved to Main Modifications MM1.1)</p>	<p>Merton Local Plan target updated to reflect the latest supply position and demonstration that Merton can deliver against the proposed stepped target.</p>	<p>November 2021 – for submission</p> <p>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</p>																																	

AM11.10	349	Figure 4.2.1-	<p><i>Figure 4.2.1 'Merton Housing Trajectory 2021/22 – 2035/36' updated – refer to Appendix 1</i></p> <p>(Now moved to Main Modifications MM1.1)</p>	<p>Merton Local Plan target updated to reflect the latest supply position and demonstration that Merton can deliver against the proposed stepped target.</p>	<p>November 2021 – for submission</p> <p><i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i></p>
AM11.11	350	11.2.9	<p>Merton's housing trajectory is supported by Merton's Housing Delivery Test Action Plan which includes details on the actions we can take <u>in the event of under delivery</u> to increase the rate and number of homes built in Merton. <u>These actions include proactive engagement with developers, registered providers and delivery partners to investigate housing delivery constraints and investigation on whether the use of our Compulsory Purchase Orders should be considered as a measure to unlock stalled housing sites.</u> The delivery of sites will be monitored in Merton's Authority Monitoring Report (AMR) and Merton's Housing Delivery Test Action Plan.</p>	<p>To address GLA and Hoo Hing and Elmbrook Ltd representations and improve clarity.</p>	<p>November 2021 – for submission</p>
AM5.10	351	11.2.12	<p>The regeneration of Morden town centre is a key priority for the council and the emerging Local Plan by means of policy N5.1 and site allocation Mo41, which seek to enable delivery of around 2,000 homes within the Morden Regeneration Zone.</p>	<p>The site allocation for Morden regeneration zone has been updated to Mo1</p>	<p>November 2021 – for submission</p>
AM12.1	374	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods , part c	<p>Encourage and enable sustainable and healthy lifestyle choices through effective public realm that facilitates active modes of transport as, set out in the chapters in this Local Plan on Health and Wellbeing and Transport.</p>	<p>Grammatical consistency</p>	<p>November 2021 – for submission</p>

AM12.2	375	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods , part f	Enhance social cohesion and mental and physical wellbeing and support the needs of all of Merton’s communities through creating sustainable buildings, spaces and environments that are well-managed, accessible, inclusive, child friendly and intergenerational <u>in line with the chapter on Health and Wellbeing.</u>	Signposted to relevant policy chapter to improve usability.	November 2021 – for submission
AM12.3	376	12.1.1	... To help deliver the principles of good design throughout the borough, Merton Council has produced a variety of Supplementary Planning Documents that provide good practice approaches to design, such as Merton’s Borough Character Study, and Conservation Area character appraisals <u>and Small Sites Toolkit.</u>	To include a reference to the Small Sites Toolkit SPD as a relevant mechanism to improve design quality, which has been developed and adopted since Merton’s previous Local Plan.	November 2021 – for submission
AM12.4	376	New paragraph below 12.1.3	<u>Development in the borough must consider all sections of the community, in particular disabled people. An inclusive environment is one, which can be used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people as set out in the chapter Health and Wellbeing.</u>	To improve clarity with regards to the term ‘inclusive’, following review of the Merton Centre for Independent Living (MCIL) Stage 3 response.	November 2021 – for submission
AM12.5	376	New paragraph below 12.1.3	<u>Development should pro-actively plan for health and wellbeing through sport and activity. Developers should consider following Sport England and Public Health England’s Active Design 10 principles, guides and checklist to help ensure their development’s layout and design helps to promote active lifestyles.</u>	To improve clarity of D12.1 part c and signpost Sports England’s Active Design guidance.	November 2021 – for submission
AM12.6	377	New paragraph below 12.1.7	<u>The production of design guides and codes can provide maximum clarity about design expectations at an early stage and should be consistent with the principles set out in the National Design Guide and National Model Design Code. This is highlighted in the NPPF para 128 and 129.</u>	To highlight important new features in the revised NPPF [20 July 2021].	November 2021 – for submission

AM12.7	378	Policy D12.2 Urban design, part c	That it has Have an appropriate street level presence and roofscape andthat creates a positive relationship to neighbouring buildings and spaces, ...	Grammatical amendment.	November 2021 – for submission
AM12.8	379	Policy D12.2 Urban design, part g	Proposals for changes to and enhancement of the highway and public realm shall If proposing changes to the highway and/or public realm, be designed according to best practice, minimising clutter and, depending on their scale and impact, may be subject to a design review process. ...	Grammatical amendment.	November 2021 – for submission
AM12.9	379	Policy D12.2 Urban design, part j	If located in town centres, high streets and other shopping areas: the development must also interact positively with the public realm by the creation of creating active and attractive frontages that promote natural surveillance through visibility between the street and the interior of the building. and Street frontages should not create dead frontage through lack of windows or provision of advertising, shelves or screening which prevents easy visibility between the ground floor and the street.	Grammatical amendment.	November 2021 – for submission
AM12.10	379	Policy D12.2 Urban design, part k	Positively contribute to the amenity of the designated open space or Metropolitan Open Land that is in close proximity if applicable.	Grammatical amendment.	November 2021 – for submission
AM12.11	380	Policy D12.2 Urban design, part n	Ensure it is accessible, inclusive, child friendly and intergenerational. It must enable an active lifestyle by designing walkable and attractive public realm and encouraging active modes of transport in line with the chapter on Health and Wellbeing and Sustainable Travel.	Signpost to relevant policy to improve clarity.	November 2021 – for submission
AM12.12	380	Policy D12.2 Urban design, part o	Support the council's vision for a net-zero carbon and climate-resilient future by taking a sustainable approach to design and delivery in line with the chapter on Climate Change as set out in the policies on 'Climate Change'.	Grammatical amendment.	November 2021 – for submission
AM12.13	380	Policy D12.2 Urban design, part s	Measures such as designing out crime, anti-terrorism, dementia friendliness friendly, green and blue infrastructure and to help manage flood risk should be actively considered at the earliest stage of planning the public realm depending on the location, scale, and setting of the development.	Grammatical amendment.	November 2021 – for submission
AM12.14	380	Policy D12.2 Urban design, below part v	Where construction work and the delivery of equipment and materials damage the public realm such as highways and footpaths, legislation allows the Council to make good any damage caused and recover the expenses incurred.	To address Merton Park Ward Residents	November 2021 – for submission

				Association representation	
AM12.15	383	12.2.5	... Development in these locations should not have an undue harm to the amenity of the open space and the council may require a Visual Impact Assessment to be undertaken and provided as part of a planning application, if deemed necessary to assess the impact. <u>See policy D.12.6. for further details on tall buildings.</u>	To signpost to relevant policy to improve clarity.	November 2021 – for submission
AM12.16	384	Below 12.2.11	<u>During construction, the public realm may temporarily be effected as agreed with the Council. However, it is unacceptable for development work to permanently damage the public realm, including roads, footways and other infrastructural items. During construction, measures to protect the public realm must be taken. Section 133 of the Highways Act 1980, amended by Section 6 of the London Local Authorities and Transport for London Act 2013, allows councils to make good any damage caused by works on land adjacent to a publicly maintainable footpath or highway and recover the expenses incurred from the landowner, the person carrying out the works or the person on whose behalf the works were carried out.</u>	To address Merton Park Ward Residents Association and to improve clarity	November 2021 – for submission
AM12.17	386	Policy D12.3 Ensuring high quality design for all developments, text	All <u>planning</u> applications shall <u>must</u> be accompanied by a Design and Access Statement (DAS) to visually demonstrate how at <u>the</u> design has developed and to justify an applicant's design decisions.	Grammatical amendment.	November 2021 – for submission
AM12.18	387	Policy D12.3 Ensuring high quality design for all developments, part g	Protect <u>Ensure</u> new and existing development <u>minimises their impact</u> from visual intrusion, noise, vibrations or pollution so that the living conditions of existing and future occupiers are not unduly diminished.	Amendment to improve clarity of policy wording	November 2021 – for submission
AM12.19	387	Policy D12.3 Ensuring high quality design for all	In residential developments, provide a mix of tenure and unit types with at least 10% of homes that meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings' <u>and all other dwellings meeting Building Regulations Requirement M4(2)</u>	To ensure consistency with Local Plan Policy H11.1 'Housing	November 2021 – for submission

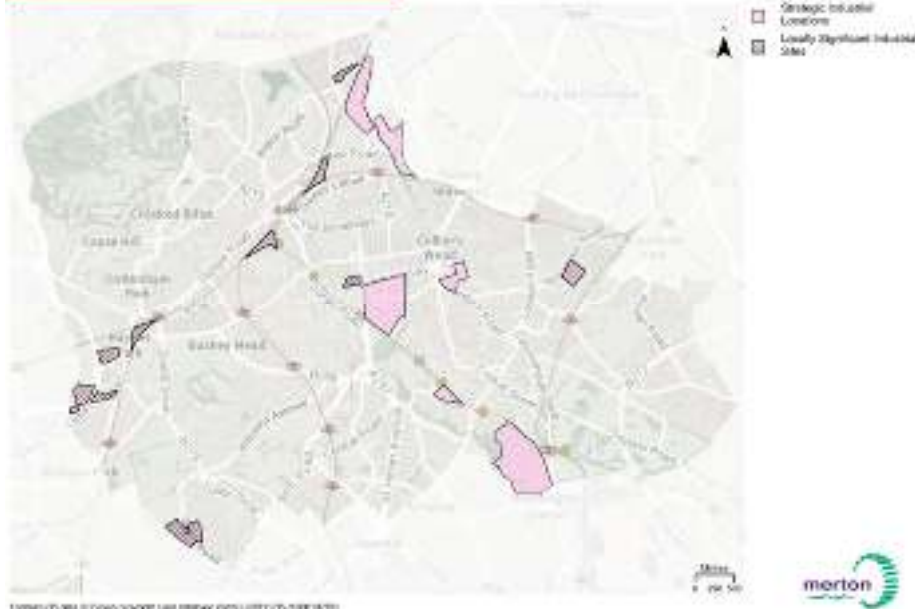
		developments, part l	<u>'accessible and adaptable dwellings'</u> as set out in <u>London Plan 2021 Policy D7 'Accessible housing' Policy H11.4</u>	choice' and London Plan Policy D7	
AM12.20	389	Policy D12.3 Ensuring high quality design for all developments, part z	In residential developments, maximise the provision of dual aspect homes. Single aspect homes <u>are strongly discouraged and</u> will only be accepted where they demonstrate they have adequate passive ventilation, daylight and privacy and avoid overheating and are necessary to optimise site capacity through a design led approach, in line with the London Plan.	To provide a clearer position on single aspect homes, following review of the Mitcham Cricket Green Community and Heritage Stage 3 response (email dated 6 September 2021)	November 2021 – for submission
AM12.21	391	12.3.2	Well sized and proportioned rooms contribute to designing successful homes. Housing developments should consider accommodating <u>Building Regulations</u> Approved Document Part M, Appendix D: Furniture Schedule in their lay outs. <u>To ensure homes are accessible to everyone regardless of their mobility or age, housing developments should also be step free, accessible and adaptable in line with London Plan 2021 policy D7 "accessible housing" and Approved Document M; flexibility may apply within blocks of 4 storeys or less in certain exceptional circumstances as outlined in London Plan policy D7.</u>	To provide consistency with policy H11.1 'Housing choice', London Plan policy D7 and the content of part 'l' of policy D12.3.	November 2021 – for submission
AM12.22	391	Below 12.3.6	<u>Historically, planning guidance has provided clear parameters on separation distances from habitable rooms of neighbouring properties. Adhering rigidly to these parameters can lead an arrangement of buildings that do not reflect the character of the neighbourhoods where they are located, such as more urban settings or tighter mews settings. As such, separation distances used must demonstrate they provide adequate privacy for occupiers and ensure they provide good levels of daylight into the dwellings.</u>	To improve clarity regarding matters in part 'g' of policy D12.3 and adherence to the guidance in the Good Quality Homes for All Londoners consultation draft SPG and the London Plan Housing SPG 2016.	November 2021 – for submission
AM12.23	394	12.3.18	... These include <u>ing</u> providing sufficient off-street storage and that bins are accessible and do not obstruct footways, especially for people with <u>health difficulties, including mobility, sensory and</u>	To correct grammar errors and address matters raised by	November 2021 – for submission

			mental health mobility or mental health problems that make it difficult to navigate obstacles, and blocking accesses or carriageways on collection days will cause major problems.	HUDU in their Stage 3 response.	
AM2.2	402	12.5.a.i	Principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, the London Plan, and Historic England guidance;	Removed reference to 2019 NPPF and draft 2021 version.	November 2021— for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>
AM12.24	402	Policy D12.5 Managing heritage assets, part c. ii.	Assets of the highest significance, grade I and II* listed buildings or registered parks and gardens should be wholly exceptional. <u>Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional</u>	Amended wording to align with that in NPPF para 200	November 2021 – for submission
AM12.25	403	Policy D12.5 Managing heritage assets, part f	Proposals affecting <u>the layout, design, character, use and function of both designated and non-designated</u> a-heritage assets or its setting should conserve and enhance the significance of the asset as well as its surroundings and have regard to the following: i. The conservation, or reinstatement if lost, of features that contribute to the asset or its setting. This may include original chimneys, windows and doors, boundary treatments and garden layouts, roof coverings or shop fronts. In listed buildings, internal features such as fireplaces, panelling, ceilings, doors and architraves as well as the proportion of individual rooms may also be of significance.	To improve clarity, following a review of the Stage 3 response from The London Historic Parks and Garden Trust (email 31 Aug 2021)	November 2021 – for submission

			<p>ii. The removal of harmful alterations such as inappropriate additions, non-original windows and doors and the removal of paint or pebbledash from brickwork.</p> <p>iii. Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the heritage asset will not be taken into account in any decision.</p> <p>iv. <u>Proposals should not prejudice the future restoration of designated historic parks and gardens.</u></p>		
AM12.26	405	12.5.6	<p>Heritage assets (HA) covered by this policy include:</p> <ul style="list-style-type: none"> Listed buildings (designated HA) Buildings in conservation areas (designated HA) Historic Registered parks and gardens (designated HA) Local Historic Parks and Gardens (undesignated HA) Scheduled ancient monuments (designated HA) Archaeological Priority Areas (designated HA) <u>Locally listed buildings, monuments, sites, places, areas, historic parks and gardens or other design landscape (non-designated HA)</u> Any other building, monument, site, area, streetscape or landscape that is positively identified as having a degree of heritage or historic significance 	To improve accuracy of the defined non-designated heritage assets, following a review of the Stage 3 response from the Mitcham Cricket Green Community and Heritage (email 06 Sept 2021)	November 2021 – for submission
AM12.27	408	Policy D12.6 Tall buildings, text	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.	Definition amended to improve clarity, following consideration of the comments received from the GLA.	November 2021 – for submission
AM12.28	408	Policy D12.6 Tall buildings, text	We <u>The council</u> will generally support tall buildings where:	To improve clarity	November 2021 – for submission
AM12.29	409	Policy D12.6 Tall buildings, part k	They're an appropriate material pallet that is well detailed and safe is proposed.	Grammatical amendment	November 2021 – for submission
AM12.30	409	Policy D12.6 Tall buildings, part l	They provide a mix of tenure and home sizes in accordance with this Local Plan's <u>policies on</u> Housing.	Grammatical revision for consistency	November 2021 – for submission

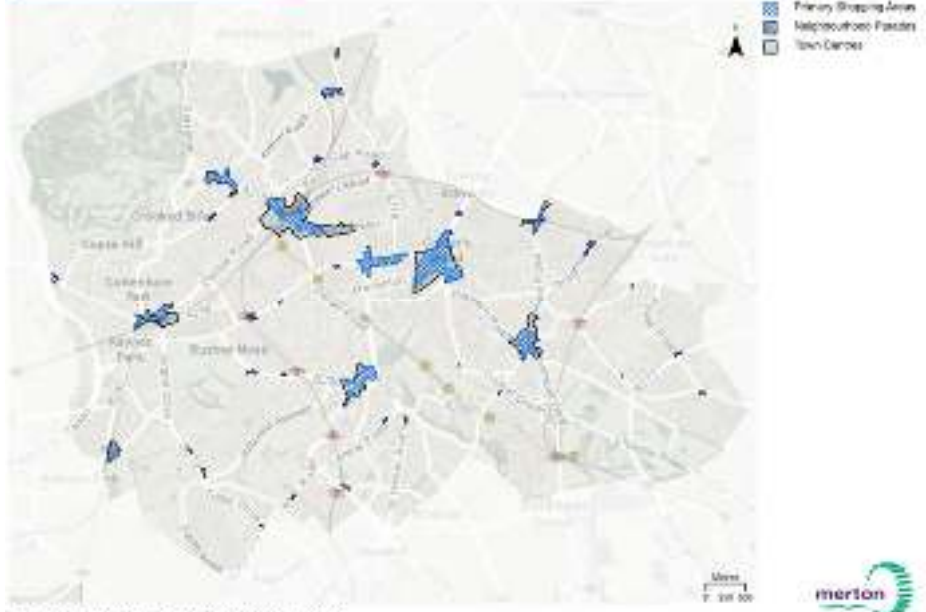
AM12.31	410	Policy D12.6 Tall buildings, part s	A detailed townscape analysis that includes short, mid and long views and analysis of its impact on <u>their setting. In particular their impact</u> on heritage assets such as parks or buildings <u>and open spaces.</u>	Grammatical amendment	November 2021 – for submission
AM12.32	411	Below 12.6.1	<u>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’.</u>	To provide detail and clarity to the related proposed modification in the policy text.	November 2021 – for submission
AM12.33	411	Below 12.6.7	<u>Consideration must be given to ensure the development is inclusive for all sections of the community, in accordance with policies on Health and Wellbeing.</u>	To improve clarity by signposting other important relevant policy matters, following a review of the Stage 3 response from the Merton Centre for Independent Living (MCIL).	November 2021 – for submission
AM12.34	419	Policy D12.10 Dwelling Conversions, part b.	Seek to minimise carbon emissions from existing buildings in accordance with <u>the chapter on climate change policies of Climate Change.</u>	Grammatical revision for consistency	November 2021 – for submission
AM2.2	434	Para 13.1.1	The NPPF 2019 and 2021 draft states that planning policies...	To improve accuracy and reflect the latest NPPF published July 2021.	November 2021 – for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary</i>

					<i>letter, March 2022</i>																		
AM13.1	441	13.2.8	As stated in the NPPF and NPPG and detailed in the draft policy in this plan on out-of-centre commercial development,...	Factual correction	November 2021 – for submission																		
AM2.2	443	13.2.16	...in line with the “Agent of Change” approach in the NPPF <u>2021</u> 2019 and in the London Plan	To improve accuracy and reflect the latest NPPF published July 2021	November 2021 – for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>																		
AM13.2	443	Table of Merton’s Strategic Industrial Locations	<table border="1"> <thead> <tr> <th>Strategic Industrial Locations</th> <th>Size (hectares)</th> <th>Character</th> </tr> </thead> <tbody> <tr> <td>South Wimbledon Business Area</td> <td>32.5ha</td> <td>One of the locations yields. Wi business</td> </tr> <tr> <td>Willow Lane</td> <td>41.4ha</td> <td>Large ind recycling</td> </tr> <tr> <td>Durnsford Road / Weir Road</td> <td>120ha</td> <td>Range of</td> </tr> <tr> <td>Plough Lane</td> <td>14.5ha</td> <td>Range of</td> </tr> <tr> <td>Hallowfield Way / Benedicts Wharf - southern half (amended)</td> <td>43.2ha</td> <td>SIL area v being rete</td> </tr> </tbody> </table>	Strategic Industrial Locations	Size (hectares)	Character	South Wimbledon Business Area	32.5 ha	One of the locations yields. Wi business	Willow Lane	41.4 ha	Large ind recycling	Durnsford Road / Weir Road	120 ha	Range of	Plough Lane	14.5 ha	Range of	Hallowfield Way / Benedicts Wharf - southern half (amended)	43.2 ha	SIL area v being rete	Factual correction	November 2021 – for submission
Strategic Industrial Locations	Size (hectares)	Character																					
South Wimbledon Business Area	32.5 ha	One of the locations yields. Wi business																					
Willow Lane	41.4 ha	Large ind recycling																					
Durnsford Road / Weir Road	120 ha	Range of																					
Plough Lane	14.5 ha	Range of																					
Hallowfield Way / Benedicts Wharf - southern half (amended)	43.2 ha	SIL area v being rete																					

AM13.3	444	Below table below 13.2.17	<p><i>New map derived directly from Merton's Policies Map, reg19 stage, showing Merton's SILs and LSISs</i></p> <p><u>Industrial areas in Merton</u></p> 	For clarity	November 2021 – for submission
AM13.4	444	13.2.21	<p>Proposals for new development or change of use should be compatible with <u>the effectiveness of the SIL in accommodating the 24-hour operation of industrial type activities including</u> the amenity of neighbouring occupiers of buildings. If proposals are likely to conflict with the successful operation of existing businesses nearby or cause harm to the amenities of occupants of neighbouring buildings without any way of mitigation, planning permission will not be granted. Mitigation measures through design conditions or planning obligations may be sought to improve site access or minimise disruption to neighbouring businesses where necessary. <u>In line with the Agent of Change principle set out in the London Plan, the council will not support proposals in designated industrial areas that would curtail the industrial operations of existing businesses.</u></p>	For clarity on implementation of London Plan policies	November 2021 – for submission
AM13.5	445	13.2.24	<p><u>Shared</u>, flexible working and co-working business spaces...</p>	For clarity, arising from Reg19 representations	November 2021 – for submission

AM2.2	448	13.3.2	The NPPF 2021-2019 paragraphs 8, 20 and 8-10-9-12 , the London Plan	To improve accuracy and reflect the latest NPPF published July 2021	November 2021— for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>
AM13.6	449	13.3.7	... the council requires the applicant to provide Marketing and Vacancy evidence in accordance with the criteria set out in the Appendices, for a minimum of 30-18 months (21 .5 years).	To improve accuracy and to align with the requirements set out in the appendices.	November 2021 – for submission
AM2.2	456	13.5.2	The NPPF 2019 (and 2021 consultation draft) makes clear that local authorities should definte <u>define</u> the extent of the Primary Shipping Area and the town centre boundary.	To improve accuracy and reflect the latest NPPF published July 2021 and a spelling correction.	November 2021— for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>
AM2.2	456	13.5.4	The NPPF 2021-2019 and associated NPPG promotes		November 2021— for submission

					<i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>
AM13.7	462-463	Table of neighbourhood parades in Merton	<i>Delete the column with unit numbers</i>	For clarity and accuracy as shop units have flexibility under the permitted development regime and the shop units are quickly out of date and distract from the postal addresses.	November 2021 – for submission

AM13.8	463	Below 13.5.34	<p><i>New map inserted, derived directly from Merton's Policies Map, reg19 stage, showing Merton's town centres and neighbourhood parades</i></p> <p><u>Town centres, primary shopping areas and neighbourhood parades in Merton</u></p> 	For clarity	November 2021 – for submission
AM2.2	465	13.6.1	<p>... the NPPF 2021 2019 (paras 86 0 91 0)...</p>	To improve accuracy and reflect the latest NPPF published July 2021	<p>November 2021 – for submission</p> <p><i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i></p>

AM2.2	465	13.6.2	The NPPF 2021-2019 and the London Plan support the “town centres first” approach...	To improve accuracy and reflect the latest NPPF published July 2021	November 2021—for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>
AM2.2	465	13.6.4	As set out in the NPPF 2019 (and the 2021 draft) the Primary Shopping Area...	To improve accuracy and reflect the latest NPPF published July 2021	November 2021—for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>
AM2.2	465	13.6.5	In accordance with the National Planning Policy Framework 2019 (NPPF 2021 paragraph 90 , impact assessments will be required	To improve accuracy and reflect the latest NPPF published July 2021	November 2021—for submission <i>Moved to Main Modifications (with same reference) in</i>

					<i>response to Inspectors preliminary letter, March 2022</i>																						
AM13.9	466	Below 13.6.8	<p><i>New table of Merton's primary shopping areas</i></p> <p><u>Merton's primary shopping areas – the extent is shown on the Policies Map</u></p> <table border="1"> <thead> <tr> <th><u>Primary Shopping Area</u></th> <th><u>Designations</u></th> </tr> </thead> <tbody> <tr> <td><u>Arthur Road</u></td> <td><u>Local town centre</u></td> </tr> <tr> <td><u>Colliers Wood</u></td> <td><u>District town centre</u></td> </tr> <tr> <td><u>North Mitcham</u></td> <td><u>Local town centre</u></td> </tr> <tr> <td><u>Mitcham</u></td> <td><u>District town centre</u></td> </tr> <tr> <td><u>Morden</u></td> <td><u>District town centre</u></td> </tr> <tr> <td><u>Motspur Park</u></td> <td><u>Local town centre</u></td> </tr> <tr> <td><u>Raynes Park</u></td> <td><u>Local town centre</u></td> </tr> <tr> <td><u>South Wimbledon</u></td> <td><u>Local town centre</u></td> </tr> <tr> <td><u>Wimbledon</u></td> <td><u>Major town centre</u></td> </tr> <tr> <td><u>Wimbledon Village</u></td> <td><u>Local town centre</u></td> </tr> </tbody> </table>	<u>Primary Shopping Area</u>	<u>Designations</u>	<u>Arthur Road</u>	<u>Local town centre</u>	<u>Colliers Wood</u>	<u>District town centre</u>	<u>North Mitcham</u>	<u>Local town centre</u>	<u>Mitcham</u>	<u>District town centre</u>	<u>Morden</u>	<u>District town centre</u>	<u>Motspur Park</u>	<u>Local town centre</u>	<u>Raynes Park</u>	<u>Local town centre</u>	<u>South Wimbledon</u>	<u>Local town centre</u>	<u>Wimbledon</u>	<u>Major town centre</u>	<u>Wimbledon Village</u>	<u>Local town centre</u>	For clarity	November 2021 – for submission
<u>Primary Shopping Area</u>	<u>Designations</u>																										
<u>Arthur Road</u>	<u>Local town centre</u>																										
<u>Colliers Wood</u>	<u>District town centre</u>																										
<u>North Mitcham</u>	<u>Local town centre</u>																										
<u>Mitcham</u>	<u>District town centre</u>																										
<u>Morden</u>	<u>District town centre</u>																										
<u>Motspur Park</u>	<u>Local town centre</u>																										
<u>Raynes Park</u>	<u>Local town centre</u>																										
<u>South Wimbledon</u>	<u>Local town centre</u>																										
<u>Wimbledon</u>	<u>Major town centre</u>																										
<u>Wimbledon Village</u>	<u>Local town centre</u>																										
AM2.2	471	13.8.1	The NPPF 2021-2019 , the London Plan and Merton's strategic policies...	To improve accuracy and reflect the latest NPPF published July 2021	November 2021 – for submission <i>Moved to Main Modifications (with same reference) in response to Inspectors preliminary letter, March 2022</i>																						
AM5.20	481	Policy IN14.1 Infrastructure	We support the provision and improvement of i nfrastructure across the borough and will work with relevant providers to	To improve clarity and indicate that it is	November 2021 – for submission																						

			<p>ensure that the necessary Infrastructure is secured to support growth in the borough over the plan period. We will:</p> <p>a. Expect new development to identify, plan for and provide any necessary Infrastructure and require that, where necessary, Infrastructure should be completed prior to occupation.</p> <p>c. Encourage dialogue between service providers and developers. Where appropriate opportunities arise, the co-location of services and joint delivery of Infrastructure by service providers will be supported.</p> <p>d. Support the delivery of high-quality, high-speed and reliable Digital Infrastructure to enable the expansion of electronic communications networks, which include full fibre broadband connections and next generation mobile technology. Development proposals will be expected to provide digital connectivity infrastructure in accordance with London Plan Policy SI6.</p> <p>g. Expect Infrastructure provision to be in keeping with the council's net zero carbon targets.</p>	defined in the glossary.	
AM14.1	481	Policy IN14.1 Infrastructure, new part after g	<u>Work in partnership with providers to ensure that water and wastewater infrastructure improvements are delivered and implemented across the borough.</u>	Policy has been added to make it clear that the council is supportive of working with water and wastewater providers to ensure infrastructure is provided.	November 2021 – for submission

				This change was made following Thames Water Stage 3 submission and a meeting held with officers. It was agreed that the Infrastructure chapter is the most appropriate location for this policy, not the flood risk policies.	
AM5.20	482	14.1.1	The infrastructure needs for Merton will be primarily to support the additional housing required over the Local Plan period. We have identified strategic priorities for health provision, education, transport infrastructure, <u>D</u> igital <u>I</u> nfrastructure, water, wastewater and sewerage provision and supporting future needs of the emergency services. Where there is an <u>I</u> nfrastructure capacity problem, we will require developers to fund appropriate improvements and where necessary, ensure improvements are completed prior to occupation.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM14.2	482	14.1.4	The <u>planned potential</u> and predicted infrastructure requirements for the Local Plan are identified in the Infrastructure Delivery Plan 2021 (IDP).	For accuracy and clarity.	November 2021 – for submission
AM5.20	482	14.1.6	... Further policies on <u>S</u> ocial and <u>C</u> ommunity <u>I</u> nfrastructure and sports and recreation facilities are provided in Policy IN14.2 and IN14.3 and policies on <u>O</u> pen <u>S</u> space and <u>G</u> reen <u>I</u> nfrastructure are considered in Chapter 15 <u>G</u> reen and <u>B</u> lue <u>I</u> nfrastructure.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	483	14.1.8	Advanced, high-quality, high-speed and reliable communications infrastructure is essential for economic growth and social wellbeing. As such, the council supports the promotion and delivery of full-fibre or equivalent <u>D</u> igital	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission

			Infrastructure. Future digital connections should be provided with a focus on affordability, security and resilience and should provide access to services from a range of providers.		
AM5.20	483	14.1.10	...We seek to improve this, and make Merton a digitally inclusive borough, by encouraging the expansion of Digital Infrastructure into areas where there are currently gaps in connectivity. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	483	14.1.11	...Fast and reliable Digital Infrastructure should be accessible to all; ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM14.3	484	14.1.13	It is important to ensure that the installation of Digital Infrastructure, together with any necessary enabling works, will not result in unacceptable damage to visual amenity or harm to environmentally sensitive features or locations. Specific design requirements for Digital Infrastructure are set out in Chapter 12 – <u>Design Places and spaces in a growing borough</u> .	To improve clarity and indicate that it is defined in the glossary. Removal of unnecessary text “-” and correction of text. Change made for accuracy and consistency throughout the Local Plan.	November 2021 – for submission
AM14.4	484-485	14.1.15 - 14.1.20	Water and Wastewater Infrastructure 14.1.15 We <u>The council</u> will work with the water and wastewater providers <u>companies to seek to ensure that there is adequate water supply, surface water, foul drainage, and wastewater infrastructure and sewerage treatment capacity to serve all new developments. Developers will also need to agree details with water and wastewater companies for adequate water supply, surface water, foul drainage and sewerage treatment capacity.</u>	Changes made to the supporting text to avoid duplication with the Flooding policies, to support the new policy IN14.1(h) and to ensure the wording	November 2021 – for submission

			<p>14.1.16 Developers will be required to demonstrate <u>as part of the planning application process</u> that there is adequate capacity both on and off-site to serve the development and that the development would not lead to problems for existing users. In some circumstances this <u>may make it necessary for developers to will necessitate that developers</u> carry out appropriate studies to ascertain the effect proposed development will have on the existing infrastructure. Overloading of the system will not be permitted.</p> <p>14.1.17 Where there is a capacity problem the developer will be required to fund appropriate improvements to be completed prior to completion of the development. An exception to this may be where the water company has improvement works programmed in that align with the completion time of the development. <u>The council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of problem the development will be required to fund appropriate improvements to be completed prior to the completion of the development.</u></p> <p>14.1.18 Thames Water and SES Water will work with developers and the council to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development.</p> <p>14.1.19 Developers are encouraged to contact the water and wastewater companies as early as possible to discuss their development proposals and intended delivery programme to assist operators with identifying any potential water and wastewater network reinforcement requirements.</p> <p>14.1.20 Where appropriate, planning permission for development which results in the need for off-site infrastructure upgrades, will be subject to conditions to ensure the occupation</p>	<p>is up to date, accurate and clear.</p> <p>Changes made following Thames Water's Stage 3 submission and a subsequent meeting held with Thames Water and officers.</p>	
--	--	--	---	---	--

			is aligned with the delivery of necessary infrastructure upgrades. Where there is a capacity constraint, phasing conditions will be used as appropriate to ensure that any necessary infrastructure upgrades can be delivered ahead of the occupation of the relevant phase of a development.		
AM14.5	486	14.1.24	National Grid's underground electricity transmission cables cross through Colliers Wood and Mitcham. In addition, the National Grid's high voltage overhead electricity transmission lines run through the borough along the River Wandle through <u>the Colliers Wood, Wimbledon and Mitcham neighbourhoods.</u> Five Three of the proposed Site Allocations (<u>CW2, CW5, Wi12, Mi1 and Mi16</u>) contain or are within close proximity to the National Grid Infrastructure. Potential developers of sites with overhead lines should be aware that it is National Grid policy to retain existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national <u>or regional</u> importance. which has been identified as such by central government.	Changes made to reflect recent information from National Grid. Updates made to the Site Allocations following National Grid's Stage 3 response and subsequent meeting between officers and National Grid.	November 2021 – for submission
AM14.6	486	14.1.26	Developers must take into account the location and nature of the existing electricity transmission equipment when planning developments. <u>The following guidance should be referenced prior to submitting a planning application: Working near our assets, Linesearch before u dig and Guidelines for development near pylons and high voltage overhead power lines. is outlined in National Grid's "A Sense of Place" guidelines on how to create high quality development near overhead lines.</u>	Changes, made for accuracy and to reflect the most recent information provided by National Grid. Updated guidance was provided by National Grid via their Stage 3 response and a subsequent meeting between officers and National Grid.	November 2021 – for submission

AM5.20	488	Policy IN14.2 Social and Community Infrastructure	<p>Social and Community Infrastructure</p> <p>Taken as a whole, Ssocial and Ccommunity Infrastructure covers a wide variety of uses. These include community and affordable meeting spaces, libraries, places of worship, education, youth services, childcare and early years, health and social care, services for the elderly or disabled, sport, recreation, informal play spaces, emergency services and other criminal justice or community safety facilities. This list is not intended to be exhaustive and other uses can be included as Ssocial and Ccommunity Infrastructure.</p> <p>We place a high priority on the provision and improvement of Ssocial and Ccommunity Infrastructure. It is essential to support those currently living, working and visiting Merton and to ensure future changes can be accommodated. These places can be the heart of local communities and they are important to ensure residents have a high quality of life. We will:</p> <ol style="list-style-type: none"> Support and encourage the most effective use of Ssocial and Ccommunity Infrastructure, to support the changing priorities and needs in the borough. Require any proposals involving the loss of Ssocial and Ccommunity Infrastructure to clearly demonstrate: 	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	490	14.2.1	Taken as a whole, S social and C community I nfrastructure covers a wide variety of uses. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM14.7	490	14.2.5	Sports and leisure facilities (including Playing Pitches), should be tested against paragraph 97-99 of the NPPF and considered against the requirements of London Plan Policy S5. ...	Change made to reference the correct paragraph in the NPPF.	November 2021— for submission <i>Moved to Main Modifications (with same reference) in response to</i>

					<i>Inspectors preliminary letter, March 2022</i>
AM5.20	491	14.2.10	We will assess planning applications in line with this policy for any proposals that involve changes to, or a loss of <u>S</u> social and <u>C</u> community <u>I</u> nfrastructure. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	491	14.2.12	Applications proposing a loss will have to demonstrate that the <u>S</u> social and <u>C</u> community <u>I</u> nfrastructure use is no longer viable on the site. For the purpose of Policy <u>IN14.2</u> IN6.2 (b) and (c), a social or community infrastructure use refers to ...	To improve clarity and indicate that it is defined in the glossary. To correct an error in referencing the correct Local Plan policy number.	November 2021 – for submission
AM14.8	496	Policy IN14.3 Sport and Recreation part c.	Support proposals for new, and refurbishment and replacement of existing, sport and recreation facilities on sites that are designated as Open Space in the Policies Map, where the proposal meets Policies O8.2, O8.3 and O8.4 <u>O15.2, O15.3 and O15.4</u> .	To correct an error in referencing the correct Local Plan policy numbers.	November 2021 – for submission
AM14.9	502	14.3.30	... The new South London Waste Plan will address waste management needs during the 15-year period from 2024 2 till 203 6 <u>7</u> .	To improve accuracy by reflecting the updated plan period for the new South London Waste Plan (Ref. 14D1).	March 2022 – response to Inspectors' preliminary matters
AM15.1	504	Policy O15.1 Open Space, Green Infrastructure and Nature Conservation, part a.	Protecting and enhancing open spaces in the borough including Metropolitan Open Land, <u>Open Space parks, other open spaces</u> and <u>Sites of Recognised Nature Conservation Interest</u> areas of nature conservation to provide high quality environments for all residents;	Following a review of the Glossary and TfL CD Stage 3 submission - this wording has been changed to reflect the defined terms in	November 2021 – for submission

				the glossary and to ensure continuity with Policies O15.2 and O15.3.	
AM5.20	504	Policy O15.1 Open Space, Green Infrastructure and Nature Conservation, part b.	Protecting and seeking improvements to walking and cycling routes to and through Open Spaces <u>green spaces</u> ;	Wording has been changed to reflect the correct term in the Glossary.	November 2021 – for submission
AM5.20	504	Policy O15.1 Open Space, Green Infrastructure and Nature Conservation, part c. – f.	<p>c. Enhancing existing Oopen S-spaces, Ggreen Corridors and the natural environment, providing habitats for biodiversity to flourish and expand;</p> <p>d. Protecting and enhancing the borough’s Bbiodiversity, particularly on Ssites-of-Recognised Nnature Conservation Interest, and supporting the objectives of the Mayor’s Environment Strategy;</p> <p>e. Increasing Ggreen-Infrastructure across the borough through Urban Greening;</p> <p>f. Enhancing accessibility to our waterways, including the River Wandle and its banks, for leisure and recreational use, while protecting its Bbiodiversity value;</p>	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.2	505	15.1.1	The policies in this chapter should be read alongside the London plan policies on Chapter 8 <u>Green infrastructure and natural environment (Chapter 8)</u> and Policy S5 <u>Sports and recreation facilities (Policy S5) of the London Plan.</u>	Wording was reviewed following the Stage 3 Local Plan submission received from RPWBA.	November 2021 – for submission

AM5.20	505	15.1.2	...Emphasis will be placed on the protection and long-term management of <u>open green</u> -spaces and areas of nature conservation, and encouraging improved accessibility to these spaces. Pedestrian and cycle routes across <u>open green</u> -spaces often form a strategically important part of the borough's cycling and walking networks and many are designated as public rights of way. These routes enable active travel choices by connecting key destinations in the borough via convenient shortcuts and quiet routes away from busy roads. Pedestrian and cycle routes through <u>open green</u> -spaces should be protected and wherever possible provided to a high standard in accordance with best practice guidance.	These words were changed for clarity and to reflect the correct term in the Glossary.	November 2021 – for submission
AM5.20	506	Policy O15.2 Open Space and Green Infrastructure part a., c., d. and e.	<p>a. Protect and enhance the borough's public and private open space network including protecting Metropolitan Open Land (MOL) and designated <u>Open Spaces</u> from inappropriate development in accordance with the London Plan and government guidance.</p> <p>c. Ensure that development proposals within designated <u>Open Spaces</u> (which have met the conditions set in part b) above, meet all the following criteria:...</p> <p>d. Require the creation of new publicly accessible open space as part of major development proposals in locations that are deficient in access to public <u>Open Space</u> and support the creation of new publicly accessible open space in all developments, where suitable and viable.</p> <p>e. Expect development to incorporate and maintain appropriate elements of <u>Green Infrastructure</u> which makes a positive contribution to the wider network of <u>Open Spaces</u>.</p>	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	507	15.2.1	Open <u>Space</u> can be multi-functional; people use green and open spaces for many purposes including exercise, play, food growing, socialising and leisure. Visual accessibility is equally as important as physical access. The protection and enhancement of open spaces enables the provision of areas for active and	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission

			passive leisure activities, has a positive impact on health and wellbeing, provides opportunities for social cohesion between members of Merton's diverse communities, provides safe pedestrian and cycle routes, provides areas for nature within urban areas and can provide areas for flood mitigation measures. Open S spaces and G reen I nfrastructure can also play a role in enhancing and conserving the historic environment.		
AM15.3	507	15.2.5	...MOL will continue to be protected from inappropriate development, in accordance with the London Plan Policy G3 and <u>NPPF paragraph 147 government guidance</u> .	To refer to the correct terms in the London Plan and NPPF.	November 2021 – for submission
AM5.20	507	15.2.6	The O pen S spaces relevant to this policy are designated on the Policies Map. These typically consist of parks, commons, playing fields, play areas, cemeteries and churchyards, woodlands and allotments. We are committed to ensuring the protection and enhancement of designated O pen S space.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	508	15.2.7	Many designated O pen S spaces have existing buildings within them, particularly when associated with leisure and sports facilities. Proposals for new or improvements to existing buildings on O pen S space that meet the criteria in the policy should ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.4	508	15.2.9	Improving accessibility to public Open Sspace The Green Infrastructure Study includes an accessibility assessment to analyse areas in the borough that are deficient in access to public open space, play areas and nature conservation, and maps are provided for each. The areas of deficiency in access to public open space are calculated by Greenspace Information for Greater London (GiGL) using their Areas of Deficiency (AoD) data model. Public open space categories are set out in the London Plan table 8.1 and provide a benchmark for the provision of publicly accessible open space, categorising spaces according to their size, facilities and local importance.	To improve clarity and indicate that it is defined in the glossary. For clarity, the table reference in the London Plan has been added.	November 2021 – for submission

AM5.20	509	15.2.15	<p>Green Infrastructure</p> <p>Green Infrastructure refers to the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems.</p>	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	509	15.2.16	All development will be expected to incorporate elements of Green Infrastructure on site, to enhance biodiversity, ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.5	509	15.2.17	...Allotments and orchards are areas set aside for food growing and are recognised for their contribution to enabling healthy and sustainable lifestyles. ...	To highlight orchards alongside allotments as areas of food growing in the borough. Reviewed and added following a submission from the Woodland Trust.	November 2021 – for submission
AM15.6	511	Policy O15.3 Biodiversity and Access to Nature	<p>Biodiversity and Access to Nature</p> <p>We are committed to protecting and enhancing the natural environment. We aim to protect and enhance Biodiversity, particularly on Sites-of-Recognised Nature Conservation Interest, and to improve accessibility to nature throughout the borough. We will:</p> <p>a. Protect all Sites-of-Recognised Nature Conservation Interest against inappropriate development that will adversely affect the nature conservation value of the site, and secure measures that enhance their nature conservation value;</p> <p>b. Protect and avoid damage to Sites-of-Recognised Nature Conservation Interest, populations of protected species, priority habitats and priority species;</p>	To improve clarity and indicate that it is defined in the glossary. To make the policy stronger and clearer for river and river bank restoration as part of biodiversity net gain. Following advice received from the Environment Agency	November 2021 – for submission

			<p>c. Protect Green Corridors from development which may destroy or impair the integrity of the Green Corridor.</p> <p>d. Require development to contribute to net gains in Bbiodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links. <u>Where development is adjacent to or includes a river, natural banks must be restored with a 10m buffer included.</u></p> <p>e. Require the following mitigation hierarchy to be followed, for development where significant harm to Bbiodiversity is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on Bbiodiversity:</p> <ol style="list-style-type: none"> i. Avoid damaging the significant ecological features of the site ii. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site iii. Deliver off-site compensation of better Bbiodiversity value. <p>f. Expect all development on sites found in an area of deficiency in access to nature to incorporate appropriate Bbiodiversity elements and habitat features to improve nature conservation, and to improve accessibility to SINCS through site design.</p>	in their Stage 3 Local Plan submission.	
AM5.20	512	15.3.2	We are committed to protecting and enhancing biodiversity, particularly on S sites-of- R ecognised N ature C onservation I nterest.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	512	15.3.3	For clarity, reference in this policy to S sites of R ecognised N ature C onservation I nterest include all sites that are designated on the Merton Policies Map as:	To improve clarity and indicate that it is	November 2021 – for submission

				defined in the glossary.	
AM5.20	513	15.3.10	Protected <u>S</u>pecies, <u>P</u>riority <u>H</u>abitats and <u>P</u>riority <u>S</u>pecies.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	514	15.3.17	Proposed development on sites in and in adjacent to Green Corridors will need to consider biodiversity, wildlife and <u>G</u> reen <u>I</u> nfrastructure elements early on in the design process. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.7	515	15.3.19	... Applicants will be expected to provide details of such features as part of planning applications <u>and should follow best practice guidance, including that prepared by the Chartered Institute of Ecology and Environmental Management.</u>	To make it clear to developers that best practice guidance should be referred to. Wording has been added following a review of the submission from Wimbledon Swifts.	November 2021 – for submission
AM5.20	515	15.3.20	Development proposals should prioritise the inclusion of <u>B</u> iodiversity on-site, selecting species for planting that complements that surrounding habitats, maximises benefits to biodiversity and is beneficial to wildlife.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.8	515	New paragraph 15.3.22	<u>In view of the Environment Bill 2020, applicants are expected to prepare planning applications using the latest <u>good practice guidance for biodiversity net gain.</u></u>	To highlight good practice guidance for biodiversity net gain. This paragraph has been added following a review of the submission from Wimbledon Swifts.	November 2021 – for submission

AM5.20	518	15.4.1	... These elements provide visual and amenity enhancements to the built environment, while also providing much needed habitats for B iodiversity. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	521	Policy O15.5 Urban Greening	<p>a. Require major developments to incorporate Urban Greening through site and building design, by:</p> <ul style="list-style-type: none"> i. Conducting an Urban Greening Factor (UGF) assessment in accordance with the methodology set out in the London Plan; ii. Achieving an UGF of 0.4 for developments that are predominantly residential; iii. Achieving an UGF of 0.3 for developments that are predominantly commercial. <p>b. Require all developments to consider Green Infrastucture at an early stage of the design process and incorporate this as part of an integrated design approach.</p> <p>c. Strongly encourage the inclusion of Urban Greening for all other development in Merton.</p>	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	522	15.5.1	Urban G reening describes the incorporation of G reen I nfrastucture elements into a development, such as vegetation, trees, green roofs, green walls, hedgerows and water features. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	522	15.5.2	London Plan Policy G5 includes a London wide UGF model to assist boroughs and developers in determining the appropriate provision of U rban G reening for new developments. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	522	15.5.3	...This policy will help to ensure that higher levels of G reen I nfrastucture are provided on development sites ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	522	15.5.4	...By ensuring that new developments incorporate U rban G reening, G reen I nfrastucture will improve across the	To improve clarity and indicate that it is	November 2021 – for submission

			borough and help to mitigate the impacts of climate change such as overheating, flooding and loss of biodiversity.	defined in the glossary.	
AM5.20	522	15.5.5	As set out in the Climate Change policies, development proposals will be required to demonstrate they are well designed, fully adaptable and resilient to the impacts of a changing climate. <u>U</u> urban <u>G</u> reening should be incorporated into the design of new development to assist in mitigating the risk of overheating and adverse impacts on the urban heat island effect.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	523	15.5.6	All applicants will be expected to consider <u>G</u> reen <u>I</u> nfrastructure at the earliest possible stage of the design process and take every opportunity to incorporate urban greening elements into their development. This should be clearly shown through the Pre-Application process.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	523	15.5.7	Applicants will be required to provide the following information: <ul style="list-style-type: none"> • Appropriate information which provides sufficient detail on the type(s) of <u>G</u>reen <u>I</u>nfrastructure proposed; • Justification indicating why the type(s) of <u>G</u>reen <u>I</u>nfrastructure have been proposed for the development; • ... 	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM5.20	523	15.5.8	Urban <u>G</u> reening is not only relevant for major development sites. Given that a large proportion of development that will come forward over the Local Plan period will be on small sites, it will be important that these sites also contribute to the provision of additional <u>G</u> reen <u>I</u> nfrastructure in the borough. Planning applications submitted for small sites will be strongly encouraged to incorporate <u>U</u> urban <u>G</u> reening on site as part of a development. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.9	524	Policy O15.6 Wandle Valley Regional Park, part d., f. and g.	d. Support the <u>protection and</u> completion of the Wandle Trail. f. Expect all new development within 400m of the Wandle Valley Regional Park to provide green infrastructure elements on site through <u>U</u> urban <u>G</u> reening.	Wording added for clarity that the council is supportive of protecting the Wandle Trail, in addition to the	November 2021 – for submission

			g. Work with the Environment Agency, Thames Water, the Greater London Authority, landowners and developers to implement flood risk reduction measures which include G reen I nfrast <u>r</u> ucture, that manage river and surface water flooding while delivering wider benefits for water and air quality, people and wildlife.	completion of those parts of the Wandle Trail that are currently unfinished. From the Wandle Valley Regional Park submission. To improve clarity and indicate that it is defined in the glossary.	
AM5.20	525	15.6.6	...In line with the other green infrastructure policies, applicants will be expected to demonstrate that proposed development will not have a significant adverse effect on P rotected S pecies or P riority S pecies and P riority H abitats.	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.10	526	15.6.10	While most sections are in a good condition, there are some missing links and areas that will require future investment and improvement to enable a continuous trail that is fully accessible to all users, at all times of the year. We support the protection and completion of the Wandle Trail, including the identified improvements in access required in the north east of the borough, near Earlsfield....	Wording added for clarity that the council is supportive of protecting the Wandle Trail, in addition to the completion of those parts of the Wandle Trail that are currently unfinished. Links with the change made to policy O15.6(d) From the Wandle Valley Regional Park submission.	November 2021 – for submission

AM15.11	526	15.6.11 15.6.12	<p>15.6.11 The <u>Wandle Trail</u> is an established footpath and cycle way, providing a 12 mile (20 km) strategic green route that offers the enjoyment of a variety of chalk stream heritage, flora and fauna. Predominantly following the River Wandle, the trail runs between East Croydon station to the Thames Path in Wandsworth, crossing through Merton.</p> <p>15.6.12 While most sections are in a good condition, there are some missing links and areas that will require future investment to enable a continuous trail. We support the completion of the Wandle Trail, including the identified improvements in access required in the north-east of the borough, near Earlsfield. Any improvements here would need to be agreed with the neighbouring borough of Wandsworth. Investment in the Wandle Trail should respect the character of the river's environs and be designed for pedestrian and cycle access.</p>	Two paragraphs removed due to duplication with paragraphs 15.6.9 and 15.6.10.	November 2021 – for submission
AM5.20	527	15.6.18	Our aspiration is for new development to complement the existing <u>G</u> reen <u>C</u> orridors. ...	To improve clarity and indicate that it is defined in the glossary.	November 2021 – for submission
AM15.12	530	15.7.5	Merton's Local Flood Risk Management Strategy identifies Merton's objectives and measures for how we will manage local flood risk, (defined as flooding from surface water, groundwater and ordinary watercourses) and it includes specific requirements with regards to about management of flood risk to and from development. ...	Merton Council, amended grammar.	November 2021 – for submission
AM15.13	537	15.8.5	To create job opportunities, deliver homes and essential infrastructure, meet the demands of predicted population growth, enable future economic growth and secure improvements in areas such as Colliers Wood and other sites within the Wandle Valley. <u>I</u> t will be necessary to develop on sites within areas at medium to high risk of flooding, subject to meeting the requirements of the Sequential and Exception Tests as set out in the NPPF.	Merton Council, amended grammar.	November 2021 – for submission

AM15.14	538	15.8.8	FRAs should assess the risk of flooding in the future as a result <u>because</u> of the impact of climate change on river flows and rainfall patterns, taking account of the latest climate change allowances. This will help minimise vulnerability and provide resilience to flooding in the future. FRAs should set out the proposed measures to; manage flood risk over the lifetime of the development. I including measures to steer development away from ...	Merton Council, amended grammar	November 2021 – for submission
AM15.15	538	15.8.11	...The Sequential Test will not be needed if, it is not a major development and at least one of the following applies: <ul style="list-style-type: none"> • It is a <u>Local Plan proposal sites allocation</u> that has, already been sequentially tested, unless the use of the site being proposed is not per the allocations in the Local Plan. • ... 	Merton Council, amended grammar.	November 2021 – for submission
AM15.16	539	15.8.14 and 15.8.15	Water infrastructure 15.8.14 We will look to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will need to show that there is adequate capacity both on and off site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out studies to learn the effect proposed development will have on the existing infrastructure. Overloading of the system will not be allowed. 15.8.15 Where there is a capacity problem the developer will need to fund improvements to be completed prior to completion of the development. An exception to this is where the water company has improvement works programmed in that fits with the completion time of the development.	Following comments from Thames Water, these paragraphs have been deleted and the appropriate wording is now within the Infrastructure Policy.	November 2021 – for submission

AM15.17	539	15.8.16	<p>... We will only allow basements and other underground/subterranean development where:</p> <ul style="list-style-type: none"> • It it can be proven it will not cause harm to the built and natural environment and local amenity including the local water environment, ground conditions and biodiversity. • The basement itself will be, protected from flooding. • Positively pumped devices are, installed to protect basements from the risk of sewer flooding. <u>Applicants are required to show the location of the pump device on the planning application drawings.</u> 	Merton Council, amended grammar..	November 2021 – for submission
AM15.18	543	15.9.5	<p>As well as managing flood risk consideration should be, made for how rainwater-harvesting systems can be, used to minimise the use of mains water, as promoted by Policy CC2.6 Sustainable Design Standards. <u>This policy provides details on the Council's water efficiency standards.</u></p>	Following comments from Thames Water. Changes provide clarity.	November 2021 – for submission
AM15.19	546	Policy P15.10 Improving Air Quality and Minimising Pollution, part I.	<p>New noise generating developments should be appropriately located to minimise their impacts on noise sensitive land uses and noise sensitive developments should be located away from noise priority locations and noise generating land uses.</p>	Removed following comments from Transport for London commercial team to be in the London Plan.	November 2021 – for submission
AM15.20	546	Policy P15.10 Improving Air Quality and Minimising Pollution, part n.	<p>... in line with the Agent of Change principle set in the National Planning Policy Framework and the London Plan <u>policy D13.</u></p>	Merton Council added policy reference for London Plan to improve clarity.	November 2021 – for submission
AM5.20	546	Policy P15.10 Improving Air Quality and Minimising Pollution, part q.	<p>... Lighting details must show that it:</p> <ul style="list-style-type: none"> • Iis appropriate for the intended use, • Provides the minimum amount of light necessary to achieve its purpose and designed to minimise the detrimental impact of glare and light spill on the local amenity, nature, biodiversity and highways, • Iis energy efficient and 	Merton Council, amended grammar and terminology to align with the correct term in the Glossary.	November 2021 – for submission

			<ul style="list-style-type: none"> • Pprovides adequate protection from glare and light spill, particularly to nearby sensitive receptors such as residential properties and <u>Sites of Recognised Nature Conservation Interest Areas</u>, including the River Wandle. 		
AM15.21	547	Policy P15.10 Improving Air Quality and Minimising Pollution, part t.	... Development will not be, permitted unless practicable and effective measures are to be taken to treat, contain or control any contamination.	Merton Council, amended grammar	November 2021 – for submission
AM15.22	547	Policy P15.10 Improving Air Quality and Minimising Pollution, part v. part ii)	ii) Threaten the structural integrity of the building <u>being built</u> , <u>the site or to be, built on</u> or adjoining the site.	Merton Council – amended grammar and clarity provided.	November 2021 – for submission
AM15.22 a	547	Policy P15.10 Improving Air Quality and Minimising Pollution, part aa	For major development, applicants should show how they have considered Merton’s Air Quality Action Plan, Merton’s emerging Air Quality Supplementary Planning Document, Merton’s emerging Non-Road Mobile Machinery (NRMM) Practical Guide, Dust Controls and Logistics Planning from the earliest stage in the design and construction method of their development.	Merton Council - for correctness	March 2022 - in response to the Inspector’s Preliminary matters
AM15.23	550	Paragraph 15.10.1	15.10.1 NPPF Paragraph 184 <u>186</u> states that Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement Air Quality Impact Assessments (AQA). All <u>local plan</u> policies in this local plan policies will play a role in reducing and mitigate against the exposure to poor air quality that causes harm to health, including other green infrastructure and health and wellbeing polices. Supported by <u>Merton’s Air Quality Action Plan, Climate Change Strategy and action plan, Merton’s Health and wellbeing strategy and Merton’s Air Quality Supplementary Planning Document (SPD)</u> these documents , support the local plan and outline steps we are taking to improve air quality in the borough.	Merton Council – amended grammar and clarity provided. Correct reference to NPPF.	November 2021 – for submission

AM15.24	549	New paragraphs 15.10.3 - 15.10.8	<p><u>15.10.3 The Environment Bill delivers key aspects of our Clean Air Strategy with the aim of maximising health benefits for all and sits alongside wider government action on air quality. The Environment Bill will deliver cleaner air for all by requiring the government to set targets on air quality, including for fine particulate matter, the most damaging pollutant to human health.</u></p> <p><u>15.10.4 Councils and other relevant public bodies will be required to work together more closely to tackle local air quality issues, and it will be easier for local authorities to enforce restrictions on smoke emissions from domestic burning, which pollutes our towns and cities. In addition, the Bill gives the government the power to make vehicle manufacturers recall vehicles if they do not comply with relevant environmental standards, ensuring illegally polluting vehicles are, taken off the road quickly.</u></p> <p><u>15.10.5 The Bill introduces a legally binding duty on the government to bring forward at least two air quality targets by October 2022. The first is to reduce the annual average level of fine particulate matter (PM2.5) in ambient air. This will deliver substantial public health benefits.</u></p> <p><u>15.10.6 The second air quality target must be a long-term target (set a minimum of 15 years in the future), which will encourage long-term investment and provide certainty for businesses and other stakeholders. The environmental targets policy paper published in August 2020 outlined the proposal to break new ground and focus this target on reducing population exposure to PM2.5.</u></p>	Paragraphs added to provide information on the new Environment Bill given Royal Assent autumn 2021.	November 2021 – for submission
---------	-----	--	---	---	--------------------------------

			<p><u>15.10.7 The principle of, a population exposure reduction target is to prioritise action that is most beneficial for public health and drive continuous improvement. This target will drive improvement across all areas of the country; even in areas that already meet the new minimum standard for PM2.5. This approach recognises there is no safe level or standard of PM2.5.</u></p> <p><u>15.10.8 A new concentration target for PM2.5 will act as a minimum standard across the country, and a population exposure reduction target (PERT) will prioritise action to secure the biggest public health benefits drive continuous improvement across the whole country, not just in pollution hotspots.</u></p>		
AM15.25	549	15.10.3	... The whole borough has been declared an Air Quality Management Area (AQMA) for last two decades.	Merton Council, amended grammar.	November 2021 – for submission
AM15.26	550	15.10.5	We require that air quality issues to be <u>are</u> considered early in the planning process and ...	Merton Council – amended grammar	November 2021 – for submission
AM15.27	551	15.10.11	... The supporting emerging Air Quality Supplementary Planning Document (SPD) provides further details on <u>for</u> AQA and what; we expect to be, proved within an AQA. ...	Wording updated following the adoption of the Air Quality SPD	November 2021 – for submission
AM15.28	552	15.10.15	...As set out in the Transport Policies, Transport Assessments/Statements will be required for development proposals <u>to properly identify transport impacts and the mitigation measures to address them.</u> so that transport impacts of development proposals can be properly identified and addressed	Merton Council – amended grammar and clarity provided.	November 2021 – for submission
AM15.29	552	15.10.16	... Delivery and servicing trips have been increasing in London, <u>and have</u> which has been accelerated recent rapid market evolution in home delivery ...	Merton Council – amended grammar and clarity provided	November 2021 – for submission

AM15.30	553	15.10.25	The Agent of Change principle, set out in the London Plan (2020) and the National Planning Policy Framework, ...	Updated for clarity.	November 2021 – for submission
AM15.30 a	554	15.10.28	As part of the development process, we require that steps be, taken to ensure that any impact is, considered carefully, and that mitigation is in place to manage these types of emissions. Applicants will be need to apply the Department for Environment, Food and Rural Affairs' (DEFRA) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems. Control of Odour and Noise from Commercial Kitchen Exhaust Systems (prepared by NETCEN for the Department for Environment, Food and Rural Affairs).	Merton Council - updated for correctness.	March 2022
AM15.31	555	15.10.31	The redevelopment of previously developed land (or 'brownfield') sites for beneficial uses, many of which are <u>may be</u> potentially affected by contamination provides an opportunity to deal with the potential risks posed by contamination to human health and the natural environment.	Merton Council, amended grammar.	November 2021 – for submission
AM15.31 a	556	15.10.40	As part of our commitment to better air quality, we will also ask, through planning conditions, that the current regulations relating to Non-Road Mobile Machinery (NRMM) is applied. be, imposed where necessary.	Merton Council, amended for clarity.	March 2022.
AM15.32	557	15.10.44	... It will also be necessary to control the hours of operation for noisy site works and the processes, that would need to be, followed to work outside these hours when and if required.	Merton Council, amended grammar.	November 2021 – for submission
AM16.1	559	Strategic Policy T16.1 Sustainable Travel, part e.	Seek to manage vehicle use and parking to improve road safety outcomes and reduce <u>traffic dominance and minimise</u> impact on the transport network.	For clarity	March 2022 (original AM 16.1 was November

					2021 – for submission)
AM16.1a	559	Strategic Policy T16.1 Sustainable Travel, part a.	Plan spatial development in accordance <u>with</u> the <u>transport</u> principles for good growth and the “20 minute neighbourhood” approach, to create complete, compact and connected communities that facilitate walking, cycling and the use of public transport and reduce the need to travel by car.	For clarity	March 2022
AM16.3	562	16.1.8	...However, there are also indications that traffic volumes have grown again to above pre-pandemic levels, which has the potential to further towards exacerbate the transport challenges of local road congestion and air pollution.	Grammar	November 2021 – for submission
AM16.4	562	16.1.9	Any long-term transition to more remote working patterns could have <u>a</u> significant positive impact on travel patterns by supporting local services, reducing commuting distances and encouraging more locally based active travel journeys.	Grammar	November 2021 – for submission
AM16.5a					
AM16.6	564	16.2.3	The Mayor’s Transport Strategy sets a target for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041. However, only around a third of Merton residents do 20 minutes of active travel a day and worryingly, there has been a slight decline over the last five years. <u>The Government’s decarbonising transport strategy sets out the aim that half of all journeys in towns and cities will be cycled or walked by 2030.</u> Approximately 30% of <u>Merton</u> residents’ daily trips are already conducted by walking but less than 2% by bicycle. TfL research indicates that a significant number of existing short car journeys in Merton could potentially be made by walking or cycling. Merton is a relatively small borough with a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling. There is significant opportunity for more cycle and walking journeys, particularly for shorter trips.	Supporting text amended and updated to provide clarity in response to comments from Merton Cycling Campaign and to include reference to the Government’s <u>decarbonising transport</u> strategy.	November 2021 – for submission

AM16.7	564	16.2.4	<p><u>Merton has and will continue to develop cycle and pedestrian routes and facilities as set out in detail in our transport strategy. Existing</u> pedestrian facilities including footpaths, lighting and crossings are generally provided to a high standard and well maintained. The <u>existing cycle network</u> has some sections of marked <u>and fully segregated and off-carriageway cycle lanes routes</u> as well as routes on quieter roads <u>and through low traffic neighbourhoods. There are cross boundary provides</u> links to neighbouring boroughs, including the cycleways <u>and into Central London via the Cycleway from Colliers Wood and from Raynes Park to New Malden.</u></p>	Supporting text amended and to provide clarity.	November 2021 – for submission
AM16.8	564-565	16.2.4 and 16.2.5	<p><u>It is, however, recognised that cycle and pedestrian provision in Merton is not of adequate standard in all areas and that significant barriers still exist to cycle and pedestrian journeys, particularly through the severance created by busy roads.</u> We will work with Transport for London, developers and other partners to make further improvements over the plan period with <u>the aim of providing comprehensive cycling and walking networks that enable active travel choices to be made. In order to contribute to aim set out in the Government's decarbonising transport strategy to deliver a world class cycling and walking network in England by 2040, Merton will produce cycling and walking strategies by 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period.</u></p>	Wording from 16.2.4 moved and additional wording added to create new paragraph 16.2.5, which provides more clarity around the requirement for improvements to cycling and walking networks, in response to comments from Merton Cycling Campaign.	November 2021 – for submission

AM16.9	565	16.2.6 new paragraph	<p><u>The Indicative Cycle Network Policy Map includes, but does not differentiate between, existing routes of varying quality and potential routes that could form part of a future comprehensive cycle network to be delivered by the end of the plan period. The network map includes existing cycle route facilities of an adequate standard (latest existing cycle facilities can be viewed on Merton's website) and some routes on quieter roads where minimal further intervention would be required. However, some existing routes will require further improvement to achieve the standards set out in the latest best practice guidance. The map includes routes which lack existing cycle provision but that have been identified in TfL's strategic cycling analysis as a priority for cycling interventions or form other key cycling desire lines. However, these are often on busy and constrained corridors and significant further feasibility work and investment will be required to deliver schemes on these routes. In particular, some of the town centres including Wimbledon and Morden are dominated by heavily trafficked gyratory road systems, which create a barrier to cycling and walking, and will require significant improvements to the road layouts and public realm to accommodate cycle routes. The proposed cycle network also includes existing pedestrian links where cycling is currently prohibited but where the route could potentially be enhanced to safely accommodate cyclists.</u></p>	<p>Paragraph 17.5.6, under policy T16.5 moved and amended create paragraph 16.2.6, which provides more clarity around what is shown on the indicative cycle network policy map, in response to comments from Merton Cycling Campaign and TfL Spatial Planning.</p>	November 2021 – for submission
AM16.10	565	16.2.5 and 16.2.6	<p><u>Developments should consider how proposals could contribute towards cycle routes on the indicative cycle network map and should also refer to Merton's and TfL's latest transport strategies and seek to consult with them at an early stage to discuss any requirements in relation to the cycle or pedestrian networks.</u> Development proposals should <u>must</u> maximise opportunities to integrate with and improve cycling and walking networks through financial contributions and/ or providing <u>new</u> routes across development sites <u>and must fully protect and upgrade any existing routes in accordance with best practice design standards.</u> Proposals for gated developments that prevent public</p>	<p>Paragraphs combined, with amended/ added to provide more clarity around requirements for development in relation to the cycle and pedestrian networks.</p>	November 2021 – for submission

			access through development sites by cyclists and pedestrians, will be resisted. Development layouts should must be designed to give priority to pedestrian and cycle movements and should facilitate access to public transport networks. <u>New and improved P-pedestrian and cycle-routes should must</u> be provided to a high standard in accordance with the latest best practice guidance (DfT Cycle infrastructure design LTN 1/20 and TfL Streets Toolkit, including Streetscape Guidance and London Cycling Design Standards).		
AM16.11	565	16.2.7	...New streets should must respect and link to the local neighbourhood they serve and provide good connections to community facilities and shops, promote improved travel choice by creating an attractive, permeable, well designed and balanced environment.	Wording strengthened	November 2021 – for submission
AM16.12	565	16.2.9	...As part of the Healthy Streets Approach, new development will be expected to should adopt the principles of low traffic neighbourhoods and filtered permeability into the site layouts and to integrate with <u>and contribute towards</u> any <u>new or</u> existing schemes <u>on the surrounding street network</u> .	Wording strengthened and clarified.	November 2021 – for submission
AM16.13	566	16.2.10	...Development proposals should must provide full layout drawings prior to the determination of application, demonstrating that it is possible and easy to manoeuvre bicycles both to and within the proposed cycle parking facilities. In places of employment, supporting facilities should must be provided including changing rooms, maintenance facilities, lockers and shower facilities (at least one per ten long-stay spaces).	Wording strengthened	November 2021 – for submission
AM16.14	568	16.3.5	Developments that will be expected to generate a significant amount number of journeys to the site by employees, visitors or residents should also submit a travel plan in accordance with TfL's latest guidance.	Grammar	November 2021 – for submission
AM16.15	569	16.3.6	<u>Proposals should also demonstrate that the transport impacts of the construction phase have been mitigated to maximise sustainability and reduce local air pollution, including through the use of rail or river (via The Thames) freight for significant developments where feasible.</u>	Sentence added to supporting text to clarify need to consider sustainable freight options during construction, in	November 2021 – for submission

				response to comments from TfL Spatial Planning.	
AM16.16	571	Policy T16.4 Parking and Low Emissions Vehicles, part b.	All new development in Controlled Parking Zones, including conversions to multiple dwellings will be permit free, <u>with occupants being ineligible to apply for on-street parking permits.</u>	Wording added to policy to clarify that occupants of development in CPZ will be ineligible to apply for permits, in response to comments from Merton Resident Transport Group and Raynes Park and West Barnes Residents Association (RPWBRA)	November 2021 – for submission
AM16.17	571	Policy T16.4 Parking and Low Emissions Vehicles, part d.	Disabled <u>persons'</u> parking should be provided in accordance with London Plan standards and should meet design guidelines, be accommodated within the development site <u>where possible</u> and be provided with electric vehicle charge points.	Policy wording amended in accordance with comments from TfL Spatial Planning.	November 2021 – for submission
AM16.18	571	Policy T16.4 Parking and Low Emissions Vehicles, part e.	Development that provides on-site car parking should provide adequate suitable infrastructure for the charging of electric vehicles, <u>in accordance with which meets or exceeds</u> London Plan standards as a minimum.	Policy wording amended for clarity.	November 2021 – for submission
AM16.19	572	16.4.2	We will expect and support car free development for all development proposals in locations that will be well connected by public transport. <u>In accordance with London Plan standards, all developments with a PTAL rating of 5- 6 must be car free.</u> Car free development may also be considered or required in other locations on a case-by-case basis where it can be adequately demonstrated that sufficient sustainable travel choices will be available including where funded improvements	Wording added and amended to provide clarity about the London Plan requirements for car free development, in response to comments from Merton Residents	November 2021 – for submission

			to public transport are put in place to raise the Public Transport Accessibility Level (PTAL). with developments elsewhere <u>Developments in less accessible locations with a low PTAL rating should be designed to</u> provide the minimum necessary <u>amount of parking in accordance with London Plan standards</u> ('car-lite').	Transport Group and Merton Cycling Campaign.	
AM16.20	572	16.4.5	...We will therefore not object <u>to proposals for the creation of new driveways</u> provided proposals they do not compromise highway safety and do not contribute to flood risk by ensuring surfacing materials are permeable	Amended wording for clarity.	November 2021 – for submission
AM16.20 a	573	16.4.8	As people take decisions about whether to own a car and what type of car to purchase, having a comprehensive and coherent parking management approach and pricing structure in place is essential. Where <u>public or</u> communal car parking facilities are provided a Parking Design and Management Plan should be submitted in accordance with TfL guidance and will be secured through planning condition or appropriate legal agreements.	Amended wording for clarity – TfL guidance not published yet.	March 2022
AM16.21	573	16.4.9	...Proposals for the management of parking provision should align with Merton's strategic approach for managing parking including through emissions-based <u>appropriate</u> parking charges....	For accuracy - the council has paused a specific emissions based charging scheme at the time of writing	November 2021 – for submission
AM16.22	574	16.4.11	Car club bays should be convenient, accessible by different operating models/operators and be made <u>publicly</u> available at all times for use by neighbouring residents 24/7 .	Amended wording for clarity.	November 2021 – for submission
AM16.24	575	16.4.15	New development that provides parking provision must provide electric vehicle charging infrastructure appropriate to the scale and type of development which, <u>in accordance with the London Plan</u> , will include active provision for at least 20% of spaces and passive provision for all car parking spaces to enable future installation to meet increased demand for EV charging....	Text added to clarify that requirements are in accordance with the London Plan.	November 2021 – for submission

AM16.25	575	16.4.15	<p>...Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it. <u>For mixed developments, the London Plan requirement for 20% active EV provision should be fully applied to any communal parking facilities, with an additional requirement for each dwelling or unit with at least one private parking space or driveway intended for their sole use, to be provided with a dedicated charge point.</u></p>	<p>To improve clarity with regards to the requirements for the application of the London Plan standard for the provision of EV charge points for mixed developments. This is in response to the announcement of emerging Government proposals for building regulation to require all new dwellings with dedicated parking space to have a charge point installed. For developments comprising a mix of units with communal parking and houses with private driveways, there is concern that a development could attempt to meet both the building regs requirement and the London Plan 20% standard by allocating charge points first to units</p>	November 2021 – for submission
---------	-----	---------	---	--	--------------------------------

				with private parking and thus leaving communal parking facilities with no or inadequate EV charging provision	
AM16.26	575	17.4.15	For public car parking facilities, such as at retail facilities, EV infrastructure should include conveniently located fast or rapid charging facilities that enable the public to pay to charge their vehicle <u>on a “pay as you go” basis.</u>	Wording amended for clarity.	November 2021 – for submission
AM16.27	575	17.4.15	<u>Arrangements for the management and operation of EV charging points within communal or public parking facilities should be set out within the submitted parking management plan.</u>	Sentence added to clarify that the parking management plan (required for all communal/ public parking facilities) should also cover arrangements for the operation of the EV charging points.	November 2021 – for submission
AM16.28	577	17.5.5	<u>The Mayor’s Transport Strategy states that</u> Crossrail 2 is an infrastructure scheme of national importance which will connect existing national rail lines in Surrey with tunnels from Wimbledon, so will have a significant impact on the borough. The route will-would increase London’s overall rail capacity by 10 per cent and will also reduce demand on the busiest section of the Northern line Morden branch by around 20 per cent.	Wording amended for clarity.	November 2021 – for submission
AM16.29	577	17.5.6	An agreement between the Government and TfL in late 2020 has put the scheme development in good order and prioritised safeguarding to protect the latest proposed route from future development until such time as the scheme can be further progressed.	Amendment for clarity to better reflect current emerging situation in relation to CR2 delivery.	November 2021 – for submission
AM16.30	578	17.5.7	However, none of the <u>sections of</u> route needed to deliver Crossrail 2, south of Wimbledon Town Centre and the onward connection onto the South West Main Line, are formally	Wording amended for clarity.	November 2021 – for submission

			safeguarded and some of the site allocations within Raynes Park potentially conflict with sites needed to deliver the route.		
AM16.31	579/80	17.5.16	<p>Cycle and Pedestrian Networks</p> <p>The Policies Map shows Merton’s indicative cycle route network to be developed during the plan period. The network will include a mix of types of infrastructure that could include fully segregated or off carriageway cycle lanes and facilities, routes on quiet residential roads and traffic free routes. Some sections already have high quality cycle facilities in place and routes on the quieter roads will require minimal intervention. However, some routes will require significant development or further improvement to achieve the standard required. In particular, some of the town centres including Wimbledon and Morden are dominated by heavily trafficked road systems, which create a barrier to cycling and walking, and will require significant improvements to the road layouts and public realm. Where the proposed cycle network includes pedestrian links where cycling is currently prohibited and cyclists are required to dismount, we will assess whether the route can be enhanced to safely accommodate cyclists including consideration of a “share with care” approach where separate facilities are not feasible. We will conduct further work to produce cycling and walking strategies by 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period and will be published on Merton Council’s website. Developers should consult the council at an early stage to discuss any requirements in relation to the cycle or pedestrian network.</p>	Paragraph amended and moved to 16.2.6 where it fits better as justification text for policy T16.2 active travel.	November 2021 – for submission
AM16.32	580	17.5.17	The table below sets out the key transport schemes identified in the Mayor’s Transport Strategy and London Plan Policy T3 that are relevant to Merton and are required to <u>will</u> deliver an enhanced or expanded travel network and to accommodate growth sustainably. Additionally, a number of locally important proposals are shown....	Wording amended for clarity	November 2021 – for submission

AM16.33	580	Table 16.1 Indicative list of transport schemes Scheme TN1	Strategic infrastructure proposal for new underground rail line running across London between Wimbledon and New Southgate/Tottenham Hale with potential ground level links to the wider rail network. <u>Currently unfunded and will not be completed in the lifetime of this Local Plan. Safeguarding retained -</u> for the current status and safeguarding of land see https://crossrail2.co.uk	Amendment for clarity to better reflect current situation in relation to CR2 scheme delivery.	November 2021 – for submission
AM16.33 a	580	Table 16.1 Scheme TN2	<u>A study has been conducted by Network Rail that includes a proposal to increase the frequency of trains on the Wimbledon loop as a primary recommendation. Although no decision has been made or funding allocated at this stage, this could potentially be implemented by the late 2020s/early 2030s subject to post-COVID recovery and service specification.</u>	For clarity in response to the Inspectors Preliminary Matters	March 2022
AM16.33 b	580	Table 16.1 Scheme TN3	<u>A proposed upgrade to the District Line that will increase frequencies to up to 16 trains per hour on the Wimbledon Branch is expected to be delivered by 2024</u>	For clarity in response to the Inspectors Preliminary Matters	March 2022
AM16.34	581	Table 16.1 Indicative list of transport schemes Scheme TN4	Improved station accessibility for all users <u>at all rail stations that do not have step free access</u> . Includes Motspur Park in feasibility /design stage (funded). Proposals to safeguard Wimbledon Chase Station redevelopment to ensure step free access can be delivered in the future.	Wording amended for clarity	November 2021 – for submission
AM16.35	581	Table 16.1 Indicative list of transport schemes Scheme TN5	Proposal for a new tram route (unfunded) between Sutton and Colliers Wood. <u>Currently unfunded and unlikely to be completed in the lifetime of this Local Plan</u> . See https://consultations.tfl.gov.uk/trams/sutton-link	Amendment for clarity to better reflect current situation in relation to Sutton Link Tram scheme delivery.	November 2021 – for submission
AM16.36		Table 16.1 Indicative list of transport schemes Scheme TN6	<u>The TfL proposal for twin tracking does not currently have funding allocated, but if funding is secured the current anticipated timescale for delivery is beyond 2031.</u>	For clarity on status of scheme in response to the Inspectors Preliminary Matters	March 2022

AM16.36		Table 16.1 Indicative list of transport schemes Scheme TN7	Potential new Tram stop at Willow Lane to enhance public transport access to Willow Lane Industrial Estate. <u>This scheme does not form part of TfL's plans and has no allocated funding, so would only be progressed during the plan period as part of appropriate enabling development and in collaboration with TfL.</u> Street running spur extension from Morden Road tram stop. Delivery will require reallocation of road space and local widening secured through negotiation with landowners as opportunities arise. <u>This scheme has no TfL funding currently allocated, but if funding is secured, timescales are anticipated to be beyond 2031.</u>	For clarity on status of scheme in response to the Inspectors Preliminary Matters	March 2022
AM16.36		Table 16.1 Indicative list of transport schemes Scheme TN8	Service enhancements to meet existing and future demand, accessible bus stops and bus stop improvements, bus priority schemes, decarbonisation of the bus fleet and exploration of demand-responsive bus services. <u>This is an ongoing annual programme which will be funded directly by TfL with potential S106 developer contributions towards specific service improvements linked to development proposals.</u>	For clarity on status of scheme in response to the Inspectors Preliminary Matters.	March 2022
AM16.36		Table 16.1 Indicative list of transport schemes Scheme TN9	<u>This major scheme will require a significant amount of funding from a combination of sources including TfL and/or Government grants, Strategic Community Infrastructure Levy funding and enabling development contributions. As set out the in Future Wimbledon SPD anticipated delivery timescales are from 2025 to 2040.</u>	For clarity on status of scheme in response to the Inspectors Preliminary Matters	March 2022
AM16.36		Table 16.1 Indicative list of transport schemes Scheme TN10	<u>This major scheme will require a significant amount of funding from TfL and enabling development schemes with an anticipated delivery timescale of late 2020s.</u>	For clarity on status of scheme in response to the Inspectors Preliminary Matters.	March 2022
AM16.36	581	Table 16.1 Indicative list of transport schemes Scheme TN11	Improvements to the walking network including routes, lighting and crossing facilities <u>including the "missing link" along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth).</u>	Wording amended to include reference to the missing link along the Wandle Trail, in response to comments from	November 2021 – for submission

				Wandle Valley Forum.	
AM16.36	581	Table 16.1 Indicative list of transport schemes Scheme TN12	Development of a strategic network of cycle routes, including new feeder routes to the Cycle Superhighway <u>and including the “missing link” along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth)</u>	Wording amended to include reference to the missing link along the Wandle Trail, in response to comments from Wandle Valley Forum.	November 2021 – for submission
AM16.36	581	Table 16.1 Indicative list of transport schemes Scheme TN13	<u>Merton will develop a cycling strategy by the end of 2023 which will set out more detailed proposals for cycle parking provision. Schemes will be implemented on an ongoing annual basis over the Local Plan period. The programme will be funded by a combination of funding for transport schemes allocated to the borough by TfL and/or Government grants, Strategic Community Infrastructure Levy funding and S106 developer contributions towards specific schemes linked to development proposals. Developers of key schemes in strategic locations may also be required to include cycle parking hubs within their development proposals.</u>	For clarity on status of scheme in response to the Inspectors Preliminary Matters	March 2022
AM16.39	581	Table 16.1 Indicative list of transport schemes Scheme TN14	<u>Merton will develop a EV strategy by the end of 2022 which will set out more detailed proposals for the provision of EV charging infrastructure. Schemes will be implemented on an ongoing basis over the plan period, including through the provision of charging infrastructure secured through development proposals. The programme will be funded by a combination TfL and/or Government grants and developer and operator funded provision</u>	For clarity on status of scheme in response to the Inspectors Preliminary Matters	March 2022
AM17.1	585-602	Appendix - Open Space	<i>The column heading has been amended for all of the following tables “Metropolitan Open Land”, “Open Space – Allotments and Farms”, “Open Space – Churchyards and Cemeteries”, “Open Space – Education”, “Open Space – all other open spaces”, “Sites of Specific Scientific Interest (European Sites)”, “Sites of Metropolitan Importance for Nature Conservation”, “Sites of Borough (Grade 1) Importance for Nature Conservation”, “Sites of Borough (Grade 2) Importance for Nature Conservation”, “Sites of Local Importance for Nature Conservation”, “Local Nature Reserves” and “Green Corridors”. Refer to Appendix 2.</i>	For the terminology to remain consistent with the Neighbourhood maps as defined on the Policies Map 2021 and used throughout the Local Plan.	November 2021 – for submission

			<u>NeighbourhoodArea</u>	In response to the Stage 3 Local Plan submission received from John Innes Society.													
AM17.2	585-602	Appendix – Open Space	<p><i>A number of factual errors have been corrected in the following tables “Metropolitan Open Land”, “Open Space – Allotments and Farms”, “Open Space – Education”, “Open Space – all other open spaces”, “Sites of Borough (Grade 1) Importance for Nature Conservation”, “Sites of Borough (Grade 2) Importance for Nature Conservation”, “Sites of Local Importance for Nature Conservation” and “Green Corridors”.</i></p> <p><i>Refer to the Appendix 2 for details of factual corrections.</i></p>	These factual corrections have been made to the Site Names and Sub-Areas and to ensure that these tables align with the Policy Maps that have been consulted on through the Local Plan process. There are no changes to the Policies Map designations as a result of these text changes and therefore these are minor modifications.	November 2021 – for submission												
AM17.3	603	Appendix – Conservation Areas	<table border="1"> <thead> <tr> <th>Code</th> <th>Name</th> <th>Area (ha)</th> </tr> </thead> <tbody> <tr> <td>19</td> <td>Mitcham Cricket Green <i>(including the Canons)</i></td> <td>52.00 <i>(8.4)</i></td> </tr> <tr> <td>29</td> <td><i>The Canons</i></td> <td><i>8.4</i></td> </tr> </tbody> </table>	Code	Name	Area (ha)	19	Mitcham Cricket Green <i>(including the Canons)</i>	52.00 <i>(8.4)</i>	29	<i>The Canons</i>	<i>8.4</i>	Factual correction to improve accuracy. Addresses matters raised in Mitcham Cricket Green Community and Heritage (MCGCH) response to Stage 3.	November 2021 – for submission			
Code	Name	Area (ha)															
19	Mitcham Cricket Green <i>(including the Canons)</i>	52.00 <i>(8.4)</i>															
29	<i>The Canons</i>	<i>8.4</i>															
AM17.4	608	Appendix - List of Buildings of Special Architectural or Historic Interest	<p><i>Remove second (duplicate) entry:</i></p> <table border="1"> <thead> <tr> <th>Property</th> <th>Street/ Road Name</th> <th>Grade</th> </tr> </thead> <tbody> <tr> <td><i>Garden Wall (4 sites)</i></td> <td><i>Church Path, Merton,</i></td> <td><i>II</i></td> </tr> <tr> <td><i>Church Field, north of</i></td> <td><i>SW19</i></td> <td></td> </tr> <tr> <td><i>St Mary’s Church</i></td> <td><i>duplicate</i></td> <td></td> </tr> </tbody> </table>	Property	Street/ Road Name	Grade	<i>Garden Wall (4 sites)</i>	<i>Church Path, Merton,</i>	<i>II</i>	<i>Church Field, north of</i>	<i>SW19</i>		<i>St Mary’s Church</i>	<i>duplicate</i>		To improve accuracy. As pointed out in the Stage 3 response by the John Innes Society.	November 2021 – for submission
Property	Street/ Road Name	Grade															
<i>Garden Wall (4 sites)</i>	<i>Church Path, Merton,</i>	<i>II</i>															
<i>Church Field, north of</i>	<i>SW19</i>																
<i>St Mary’s Church</i>	<i>duplicate</i>																

AM17.5	613	Appendix - List of Buildings of Special Architectural or Historic Interest	<table border="1"> <thead> <tr> <th data-bbox="651 137 1003 172">Property</th> <th data-bbox="1003 137 1346 172">Street/ Road Name</th> <th data-bbox="1346 137 1547 172">Grade</th> </tr> </thead> <tbody> <tr> <td data-bbox="651 172 1003 248">Eagle House</td> <td data-bbox="1003 172 1346 248">High Street, Wimbledon, SW19</td> <td data-bbox="1346 172 1547 248">II*</td> </tr> <tr> <td data-bbox="651 248 1003 355">Iron Screen Railings, Gate Piers and Gates to Eagle House</td> <td data-bbox="1003 248 1346 355">High Street, Wimbledon, SW19</td> <td data-bbox="1346 248 1547 355">II</td> </tr> </tbody> </table>	Property	Street/ Road Name	Grade	Eagle House	High Street, Wimbledon, SW19	II*	Iron Screen Railings , Gate Piers and Gates to Eagle House	High Street, Wimbledon, SW19	II	Factual correction as recommended by the Wimbledon Society	November 2021 – for submission
Property	Street/ Road Name	Grade												
Eagle House	High Street, Wimbledon, SW19	II*												
Iron Screen Railings , Gate Piers and Gates to Eagle House	High Street, Wimbledon, SW19	II												
AM17.6	618	Appendix - List of Buildings of Special Architectural or Historic Interest	<table border="1"> <thead> <tr> <th data-bbox="651 403 1003 438">Property</th> <th data-bbox="1003 403 1346 438">Street/ Road Name</th> <th data-bbox="1346 403 1547 438">Grade</th> </tr> </thead> <tbody> <tr> <td data-bbox="651 438 1003 547">Drinking Fountain & Castle Cattle/ Horse Trough</td> <td data-bbox="1003 438 1346 547">Parkside, SW19</td> <td data-bbox="1346 438 1547 547">II</td> </tr> </tbody> </table>	Property	Street/ Road Name	Grade	Drinking Fountain & Castle Cattle / Horse Trough	Parkside, SW19	II	Spelling correction	November 2021 – for submission			
Property	Street/ Road Name	Grade												
Drinking Fountain & Castle Cattle / Horse Trough	Parkside, SW19	II												
AM17.7	627	Appendix - Archaeological priority zones and ancient monuments	<p data-bbox="651 563 1547 627">Archaeological Ppriority Areas zones and ancient monuments</p> <p data-bbox="651 627 1547 882">Archaeological Priority Zone<u>Areas</u> and Scheduled Ancient Monuments have been defined by the Historic England, Greater London Archaeological Advisory Service. Merton has 20 areas designated as Archaeology Priority Zones<u>Areas</u> (APZAs) arranged under a number of archaeological themes<u>Tiers</u>. Full details of the council's supplementary guidance note on Archaeology can be viewed via: <a data-bbox="651 882 1547 962" href="https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/archaeology/archaeological-priority-zones">https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/archaeology/archaeological-priority-zones <u>Details about the Tier system and the APAs listed below can be viewed via:</u> <a data-bbox="651 962 1547 1074" href="https://historicengland.org.uk/content/docs/planning/apa-merton-pdf/">https://historicengland.org.uk/content/docs/planning/apa-merton-pdf/</p> <p data-bbox="651 1137 1547 1177">Archaeological Priority Zones<u>Areas</u> (APZAs)</p> <ul data-bbox="701 1201 1178 1465" style="list-style-type: none"> • Wandle Valley Alluvium • Beverly Brook Valley Alluvium • Wimbledon Common • Mitcham Common • Merton Village • Wimbledon Village • Mitcham Village 	To improve clarity by using the same terminology as that used by Historic England and in the London Plan, and by providing the most up to date information.	November 2021 – for submission									

		<ul style="list-style-type: none"> ● Morden Village ● Cannon Hill ● Lower Morden ● West Barnes Farm ● Stane Street ● Wandle/ Copper Mill Lane ● Wandle/ Colliers Wood ● Wandle/ Mitcham ● Mill Corner ● Merton Place ● Wimbledon Park House ● Morden Hall and Park ● Morden Park <p><u>Tier I</u></p> <ul style="list-style-type: none"> ● <u>Caesar's Camp, Wimbledon Common</u> ● <u>Merton Priory</u> ● <u>Morden Park Mound</u> ● <u>Ravensbury Saxon cemetery</u> <p><u>Tier II</u></p> <ul style="list-style-type: none"> ● <u>Cannizaro</u> ● <u>Cannon Hill</u> ● <u>Lavender Park</u> ● <u>Merton 19th Century Cemeteries</u> ● <u>Merton Place</u> ● <u>Merton Village</u> ● <u>Mitcham</u> ● <u>Morden</u> ● <u>Stane Street</u> ● <u>Wandle Valley / Colliers Wood</u> ● <u>Wandle Valley / Mitcham</u> ● <u>Wandle Valley / Morden Hall Park</u> ● <u>West Barnes Farm</u> ● <u>Wimbledon Common</u> 		
--	--	--	--	--

			<ul style="list-style-type: none"> • Wimbledon Park House • Wimbledon Village <p>Tier III</p> <ul style="list-style-type: none"> • Wandle Valley Earlsfield • Mitcham Common • Beverley Brook <p>Scheduled Ancient Monuments</p> <ul style="list-style-type: none"> • Caesar’s Camp, Wimbledon Common • Merton Priory • Morden Park Mound 		
AM17.8	633	Appendix - Employment opportunities for Merton	Policy EC13.4 ‘local employment opportunities’ sets out...	Policy reference correction to improve clarity and accuracy.	November 2021 – for submission
AM17.9	636-665	Appendix - Glossary	<p><i>The following defined terms have been amended as shown and where they are used within definitions, they have been amended accordingly:</i></p> <p>Affordable Housing Brownfield Land Communal hHeating sSystems Dual aAspect dDwelling Edge-of-Centre Family hHousing Floorspace gGross Floorspace (nNet –(for retail purposes), Out-of-eCentre, Public rRealm Secondary hHeat Service rRetailing Town eCentre Town eCentre tType uUses Whole life-cycle Carbon (WLC)</p>	To improve clarity and consistency with other defined terms in the Glossary.	November 2021 – for submission

AM17.10	636	Appendix – Glossary	Archaeological Priority <u>ZoneArea</u>	To improve clarity by using the same terminology as that used by Historic England and in the London Plan.	November 2021 – for submission
AM17.11	637	Appendix – Glossary	Blue infrastructure refers to urban infrastructure relating to water- <u>comprising of a network of rivers, water spaces, plus the green elements of the built environment, such as street trees, green roofs and Sustainable Drainage Systems, all of which provide a wide range of benefits and services.</u> Blue infrastructure is commonly associated with green infrastructure in the urban setting and may be referred to as blue-green infrastructure when in combination.	Expanded the definition and linking with others.	November 2021 – for submission
AM17.12	653	Appendix – Glossary, new defined term to be insert after ‘Nature Conservation’	<u>Neighbourhood</u> <u>There are six Neighbourhoods in the borough, which are Colliers Wood, Mitcham, Morden, Raynes Park, South Wimbledon and Wimbledon. These are illustrated on the Policies Map.</u> <u>It should be noted these six Neighbourhoods are described as ‘borough area’ or ‘sub-areas’ in the Merton Borough Character Study SPD, but for the purposes of the Local Plan, they are referred to as Neighbourhoods.</u>	To improve clarity by specifying that the capitalised form of the word refers to a specific area indicated on the Policies Map.	November 2021 – for submission
AM17.13	657	Appendix - Glossary	<u>Public Open Space</u> Parks and similar land for public use, whether provided by the Council, or privately, where access for the public is secured by virtue of legal arrangements.	Following review of the policies in Chapter 15, this definition is not required.	November 2021 – for submission
AM17.14	660	Appendix – Glossary, new defined term to be insert after ‘Site of Importance for Nature Conservation (SINC)’	<u>Sites of Recognised Nature Conservation Interest</u> <u>All sites that are designated on the Merton Policies Map as: Sites of Special Scientific Interest (SSSI), Metropolitan, Borough or Local Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR) and Green Corridors.</u>	Following review of the policies in Chapter 15, this definition is required to be added to the Glossary. It is also included in para 15.3.3, but is referenced in other	November 2021 – for submission

				policies. This change has been made to improve clarity.	
--	--	--	--	---	--

Appendix 2

Open space

These open spaces are illustrated on the Policies Map.

Metropolitan Open Land (MOL)

Site	Name	<u>Area</u> <u>Neighbourhood</u>
1	Cannon Hill	<u>Morden</u> <u>Raynes Park</u>
2	Wimbledon Park	Wimbledon
3	Lower Morden	Morden
4	Beverly Brook/A3	Raynes Park
5	Copse Hill	<u>Wimbledon</u> <u>Raynes Park</u>
12	Wimbledon Common	Wimbledon
14	Mitcham Common	Mitcham
16	Morden Park	Morden
18	Wandle Valley	Morden

Open Space - Allotments and Farms

Site	Name	Area <u>Neighbourhood</u>
A001	Western Road Allotments	Mitcham
A002	Martin Way East Allotments	<u>Morden</u> Raynes Park
A003	Eastfields Road Allotments	Mitcham
A004	New Barnes Avenue Allotments	Mitcham
A005	Thurleston Avenue Allotments	Morden
A006	Eveline Road Allotments	Mitcham
A007	Effra Road Allotments	Wimbledon
A008	George Hill, Holne Chase Allotments	<u>Morden</u> Mitcham
A009	Ridge Road Allotments	Mitcham
A010	Cottenham Park Allotments	Wimbledon
A011	Martin Way West Allotments	Morden
A012	Cannon Hill Common Allotments	<u>Morden</u> Raynes Park
A013	Arthur Road Allotments, New Malden	Raynes Park
A014	Tamworth Farm Allotments, Rose Avenue	Mitcham
A015	Phipps Bridge Allotments	Mitcham
A016	Durnsford Road Allotments, Gap Road	Wimbledon
A017	Haslemere Avenue Allotments	Wimbledon
A018	Cannizaro Park Allotments	Wimbledon
A019	Brooklands Avenue Allotments	Wimbledon
A020	Havelock Road Allotments	Wimbledon
F001	Deen City Farm	<u>South Wimbledon</u> Morden
A021	Mary Tate Almshouses Allotments	Mitcham

Open Space - Churchyards and Cemeteries

Site	Name	AreaNeighbourhood
C001	Buddhapadipa Temple Grounds	Wimbledon
C002	St Mary's Church, Wimbledon	Wimbledon
C003	Merton & Sutton Joint Cemetery	Morden
C004	Streatham Park Cemetery	Mitcham
C005	London Road/Victoria Road Cemetery	Mitcham
C006	Gap Road (Wimbledon) Cemetery	Wimbledon
C007	Morden Cemetery	Morden
C008	Mitcham Parish Church	Mitcham
C009	St Marys Churchyard, Merton Park	Morden

Open Space – Education

Site	Name	AreaNeighbourhood
S001	Ricards Lodge	Wimbledon
S002	Kings College School Playing Field	Wimbledon
S003	Farm Road Playing Fields	Morden
S004	Harris Academy Morden	Morden
S005	Wimbledon Chase Primary School	Wimbledon
S006	Cranmer Primary	Mitcham
S007	Abbotsbury <u>Primary</u> School	Morden
S008	Raynes Park High <u>High</u> School	Raynes Park
S009	Wimbledon High School Sports Ground	Wimbledon
S010	Hillcross Primary School	Morden
S011	Wimbledon College	Wimbledon
S012	Bond Primary School	Mitcham
S013	Haslemere Primary School	Mitcham

Site	Name	Area/Neighbourhood
S014	Cricket Green School	Mitcham
S015	Harris Primary Academy (former Garden Primary School)	Mitcham
S016	Malmesbury <u>Primary</u> School	Morden
S017	Merton Abbey Primary and Harris Wimbledon Academy	<u>South Wimbledon</u> Colliers Wood
S018	Benedict <u>Academy</u> Primary School	Mitcham
S020	Stanford Primary School	Mitcham
S021	Priory Church Of England	Wimbledon
S022	Beecholme School	Mitcham
S023	Wimbledon College Sports	Raynes Park
S024	Goals Wimbledon	Raynes Park
S025	St John Fisher School	Raynes Park
S027	Kings College School Sports Ground	Raynes Park
S028	Aragon Primary	Morden
S029	Hatfield Primary School	Morden
S030	Poplar School	Morden
S031	Rutlish High School	Wimbledon <u>Morden</u>
S032	Harris Academy Merton	Mitcham
S033	St Marks Church of England Academy	Mitcham
S035	Holy Trinity <u>Primary School</u>	Wimbledon
S036	St Thomas Of Canterbury	Mitcham
S037	Liberty Primary School	Mitcham
S038	St Teresa's Primary	Morden
S039	Bishop Gilpin, Lake Road	Wimbledon
S040	Garfield School, Garfield Road	Colliers Wood
S041	Lonesome Primary, Grove Road	Mitcham
S042	Morden Primary School, London Road	Morden

Site	Name	Area <u>Neighbourhood</u>
S043	West Wimbledon Primary	Raynes Park
S044	Emmanuel School Playing Fields	Raynes Park
S045	St Matthew's Church of England Primary School (former Oberon Playing Fields)	Raynes Park
S046	Wimbledon Park Primary School	Wimbledon
S048	Wimbledon College Prep Donhead	Wimbledon
S049	The Norwegian School Playing Fields	Raynes Park
S050	The former Blossom House School Playing Fields, The Drive	Wimbledon
S051	Hollymount School Playing Fields	Wimbledon
S052	Ursuline High School	Raynes Park
S053	Melrose School	Mitcham
S054	St Marks Primary School	Mitcham
S055	Perseid Upper School Playing Fields (formerly St Anns)	Morden
S056	Joseph Hood Primary School	Wimbledon
S057	Merton College	Morden
S058	Sacred Heart Catholic Primary School	Raynes Park
S059	Links Primary School Playing Fields	Mitcham
S060	Gorringe Park Primary School Playing Fields, Sandy Lane	Mitcham
S061	Singlegate Primary School	Colliers Wood
S062	Pelham Primary School, Russell Road	Wimbledon
S063	Merton Park Primary School, Church Lane	Morden
S064	All Saints C of E Primary School, East Road	Colliers Wood
S065	St Marys RC Primary School	Wimbledon
S066	SS Peter and Paul RC Primary, Cricket Green	Mitcham

Open space - All other open spaces

Site	Name	AreaNeighbourhood
CG001	Thompsons Arthur Road Commercial Plant Nursery <u>Motspur Park</u>	Raynes Park
M001	Morden Hall Park	Morden
M002	Figges March	Mitcham
M003	Three Kings Piece	Mitcham
M004	London Road Playing Fields	Mitcham
M005	Wandle Park	Colliers Wood
M006	Dundonald Recreation Ground	Wimbledon
M007	Cranmer Green	Mitcham
M008	Moreton Green	Morden
M009	Lavender Park	<u>Colliers Wood</u> Mitcham
M010	Durnsford Road Rec	Wimbledon
M011	Haydons Road Rec	Wimbledon
M012	Colliers Wood Rec	Colliers Wood
M013	Cottenham Park	Raynes Park
M014	Donnelly Green <u>Pollards Hill Estate</u> Open Space	Mitcham
M015	Myrna Close Open Space	Mitcham <u>Colliers Wood</u>
M016	John Innes Park	Morden
M017	South Park Gardens	Wimbledon
M018	Cherry Tree Estate Open Space	Mitcham
M019	Cherrywood Open Space	Morden
M020	Brenley Park	Mitcham
M021	Lyndhurst Rec	Mitcham
M022	Holland Gardens	Raynes Park
M023	Sherwood Park Road	Mitcham
M024	Kendor Gardens	Morden
M025	Vestry Hall Green	Mitcham

Site	Name	Area <u>Neighbourhood</u>
M026	Rowan Road Rec	Mitcham
M027	Church Lane Playing Fields	Wimbledon <u>Morden</u>
M028	Lynmouth Gardens	Morden
M029	Deer Park Gardens	Mitcham
M030	Lewis Road Rec	Mitcham
M031	Moreton Green	Morden
M032	Miles Road Open Space	Mitcham
M033	Upper Green (also known as Fair Green)	Mitcham
M034	All Saints Rec	Colliers Wood
M035	Nelson Gardens	Colliers Wood
M036	Margin Drive Open Space	Wimbledon
M037	Vectis Gardens	Mitcham
M038	Poplar Court Open Space	Wimbledon
M039	Rock Terrace Rec	Mitcham
M040	Oakleigh Way Recreation Ground	Mitcham
M043	Crooked Billet Open Space	Wimbledon
M044	Wimbledon Common (excluding Royal Wimbledon Golf Course)	Wimbledon
M046	Raynes Park Sports Ground	Raynes Park
M047	Cannon Hill Common	<u>Morden</u> Raynes Park
M048	Sir Joseph Hood Memorial Playing fields	Raynes Park
M049	King Georges Field	Morden
M050	Morden Park	Morden
M051	Mostyn Gardens	Morden
M052	John Innes Recreation Ground	Morden
M053	Ravensbury Park	Mitcham
M054	Cricket Green	Mitcham

Site	Name	<u>Area</u> <u>Neighbourhood</u>
M055	Police Green	Mitcham
M056	Mitcham Common	Mitcham
M057	Mitcham Sports Ground	Mitcham
M058	The Canons	Mitcham
M059	Pollards Hill Open Space	Mitcham
M060	Long Bolstead Rec	Mitcham
M061	Tamworth Farm Rec	Mitcham
M062	Abbey Rec	<u>South</u> Wimbledon
M063	Garfield Road Rec	Wimbledon <u>Colliers Wood</u>
M064	Land Adjacent River Wandle	Colliers Wood
M066	Morden Recreation Ground	Morden
M067	Edenvale Play Area	Mitcham
M068	Wandle Meadow Nature Park	Colliers Wood
M069	St Mary's Church yard and field, Merton Park	Morden
M070	Robinhood Close Open Space	Mitcham
M071	Watermeads	Morden
M072	Joseph Hood Recreation Ground	Morden
M074	Merton & Sutton Joint Cemetery Surrounds	Morden
M075	St Mary's Chuchyard and field	Wimbledon
M076	Rowan Park	Mitcham
M077	Wimbledon Park	Wimbledon
M078	Land adjacent to River Wandle, <u>Weir Road</u>	Wimbledon
M078	Seymour Road Park	Wimbledon
M079	Alfreton Close Corner Park	Wimbledon
M080	Welford Park and Path	Wimbledon
<u>M081</u>	<u>Gap Road Park</u>	<u>Wimbledon</u>
M082	Herbert Road Park	Wimbledon

Site	Name	Area <u>Neighbourhood</u>
M083	St Mark's Church	Wimbledon
M084	Edge Hill Court North	Wimbledon
M085	Edge Hill Court South	Wimbledon
M086	All Saints Road Open Space	Wimbledon
M087	Bushey Court Park	Raynes Park
M088	Three Kings Piece <u>Pond and</u> Open Space	Mitcham
M089	Marlowe Square Open Space	Mitcham
M090	Recreation Way Open Space	Mitcham
M091	Crossway Open Space	Raynes Park
M092	Trafalgar Garden	Colliers Wood
M093	Hamilton Gardens Open Space	Colliers Wood
M094	Hardy Gardens Open Space	Colliers Wood
M095	Caesars Walk Open Space	Mitcham
M096	Central Ward Residents Club	Morden
M097	Haynt Walk Open Space	<u>Morden</u> Raynes Park
M098	Botsford Road Open Space	<u>Morden</u> Wimbledon
M099	Trenchard Court Haig Homes Open Space, Green Lane	Morden
M100	The Precincts Haig Homes Open Space, Green Lane	Morden
M101	St Helier Avenue Open Space	Morden
M102	Home Park Road Open Space	Wimbledon
M0103	Hertford Way Open Space	Mitcham
M0104	Wimbledon War Memorial	Wimbledon
M0105	Dennis Park Crescent Open Space	Wimbledon
<u>M0106</u>	<u>Stanford Road Play Space</u>	<u>Mitcham</u>
<u>M0107</u>	<u>Land rear of Stanford Primary School</u>	<u>Mitcham</u>
<u>M0108</u>	<u>Seymour Road Park</u>	<u>Wimbledon</u>

Site	Name	Area/Neighbourhood
P001a	Natwest Sports Ground	Mitcham
P001b	Chilmark Road Open Space	Mitcham
P002	Raynes Park Playing Fields	Morden Raynes Park
P004	Raynes Park High School Sports Ground	Raynes Park
P005	Malden Golf Course	Raynes Park
P006	LESSA Sports Ground, Meadowview Road	Raynes Park
P007	Playing Field Wimbledon College	Raynes Park
P008	The Old Rutlishians Sports Club	Morden
P009	West Side Lawn Tennis Club	Wimbledon
P010	Queensmere Road Tennis Courts	Wimbledon
P012	Wilton Grove Tennis Club	Wimbledon
P014	Raynes Park Lawn Tennis Club Residents Open Space	Raynes Park
P015	West Wimbledon Bowling Club	Wimbledon Raynes Park
P016	Merton Hall Bowling Green	Wimbledon
P017	Royal Wimbledon Golf Club, Camp Road	Wimbledon
P018	Morley Park	Raynes Park
P020	Old Wimbledonians Sports Ground Civil Service Sports Ground	Raynes Park
P021	Beverley Park Golf Range	Raynes Park
P022	Prince Georges Fields	Morden
P023	Messines Playing Fields	Morden
P024	Old Tenisonians Sports Ground	Raynes Park
P025	Morden Park Playing Fields	Morden
P026	Cranleigh Lawn Tennis Club	Morden
P027	Nursery Road Playing Fields	South Wimbledon
P028	Tooting Mitcham & Mitcham Imperial Sports Ground	Mitcham Morden
P030	Westminster City School Playing Fields	Mitcham

Site	Name	AreaNeighbourhood
P033	<u>Kings College School</u> Morden Sports Ground	Raynes Park
P034	The David Lloyd Club	Raynes Park
P035	All England Lawn Tennis Club	Wimbledon
P036	Former St Catherine's Playing Fields	Raynes Park
P037	BMX track	Mitcham
P038	Southey Bowling Club	Raynes Park
<u>P039</u>	<u>Goals Wimbledon</u>	<u>Raynes Park</u>
W001	George Hill Open Space and Pyl Brook Nature Reserve	Morden
W002	Priory Wall Open Space Walk, Priory Road	Colliers Wood
W003	Land Along Wandle River	Wimbledon
W004	River Wandle riverside walk (also known as Bennett's Hole).	Mitcham
W005	Land Adjacent River Wandle	<u>South Wimbledon</u> Colliers Wood
W006	Merton Park Green Walk	<u>South Wimbledon</u> Morden
W007	Rookwood Open Space, Rookwood Avenue	Raynes Park

Nature Conservation

These areas of SSSI, SINCs and Local Nature Reserves are illustrated on the Policies Map.

Sites of Special Scientific Interest ('European Sites')

Site	Name	<u>Area</u> <u>Neighbourhood</u>
N/A	Wimbledon Common	Wimbledon

Sites of Metropolitan Importance for Nature Conservation

Site	Name	<u>Area</u> <u>Neighbourhood</u>
M093	Mitcham Common	Mitcham
M136	Morden Cemetery	Morden
M091	The Upper River Wandle	Morden
M101	Wimbledon Common and Putney Heath	Wimbledon

Sites of Borough (Grade 1) Importance for Nature Conservation

Site	Name	<u>Area</u> <u>Neighbourhood</u>
01	Morden Hall Park and Deen City Farm	Morden
02	Wimbledon Park – Merton section	Wimbledon
03	Royal Wimbledon Golf Course south	Wimbledon
04	Wandle Trail Nature Park and the Lower River Wandle	<u>Colliers Wood</u> Wimbledon
05	Sir Joseph Hood Memorial Wood	Raynes Park
06	Worcester Park Green Lanes	Morden
07	Malden Golf Course and TWU Pipe Track	Raynes Park
08	Cannizaro Park	Wimbledon
09	Morley Park Woodland	<u>Wimbledon</u> Raynes Park
10	Cannon Hill Common	<u>Morden</u> Raynes Park
11	Morden Park	Morden

Sites of Borough (Grade 2) Importance for Nature Conservation

Site	Name	Area/Neighbourhood
01A	Streatham Junction to Wimbledon Railsides	<u>Colliers Wood</u> Wimbledon
01B	East Wimbledon Railsides	Wimbledon
01C	District line through Wimbledon	Wimbledon
01D	Wimbledon to Dundonald Road Tramlink	Wimbledon
01E	Railsides west of Wimbledon station	<u>Raynes Park</u> Wimbledon
01F	Sutton Line South of Wimbledon	Wimbledon
02	Derwent Road Floodwash	Morden
03	Lower Pyl Brook	Morden
04	Pyl Brook Nature Reserve	Morden
05	Beverly Brook in Merton	Raynes Park
06	Oakleigh Way Nature Area	Mitcham
08	Cherrywood	Morden
09	Abbotsbury School Meadowlands	Morden
10	Myrna Close Valley	Colliers Wood
11	Budhhapadipa Temple Grounds	Wimbledon
12	Merton Park Green Walks	Morden
13	Prince Georges Playing Field	Raynes Park
14	Coombe Wood	Wimbledon
15	Ravensbury Park	Mitcham
16	Durnsford Wetland	Wimbledon
17	St Peter and St Paul Churchyard	Mitcham
18	Wandle Park	Colliers Wood
19	London Road Playing Fields	Mitcham

Sites of Local Importance for Nature Conservation

Site	Name	<u>Area</u> <u>Neighbourhood</u>
01	Ricards Lodge High School Park House Middle School <u>Conservation Area</u>	Wimbledon
03	Church Lane Playing Fields	Morden
04	St Mary's Churchyard and Glebe Fields	Morden
05	Poplar First School Nature Area	Morden
06	Eltandia Hall Nature Area	Mitcham
08	Morden Recreation Ground Spinney	Morden
09	Moreton Green	Morden
10	Three Kings Pond and Commonsides Rough	Mitcham
11	Cranmer Green Meadow and Pond	Mitcham
12	Liberty Primary <u>Middle</u> School Conservation	Mitcham
13	The Chase	Wimbledon
14	St Mary's RC Primary School Nature Garden	Wimbledon
16	St Mary's Churchyard	Wimbledon
18	Canons Pond	Mitcham
19	Raynes Park Sports Ground Wildlife Area	Raynes Park
20	Pyl Brook by Garth Road	Morden
21	St Laurence's Churchyard	Morden
22	Haig Homes Estate	Morden
<u>23</u>	<u>Woodmansterne Nature Reserve</u>	<u>Mitcham</u>
<u>24</u>	<u>Bellamy Copse</u>	<u>Mitcham</u>

Local Nature Reserves

Site	Name	<u>Area</u> <u>Neighbourhood</u>
01	Bennett's Hole	Mitcham
02	Cannon Hill Common	Raynes Park
03	Cherry Wood	Morden
04	Cranmer Green	Mitcham
05	Derwent Floodwash (proposed)	Morden
06	Fishponds Wood/ Beverley Meads	Wimbledon
07	Lower Wandle	Wimbledon
08	Merton Green Walks	Morden
09	Morden Park	Morden
10	Myrna Close	Colliers Wood
11	Oakleigh Way	Mitcham
12	Pyl Brook	Morden
13	Ravensbury Park	Mitcham
14	Sir Joseph Hood Memorial Wood	Raynes Park
15	Wandle Meadow Nature Park	Colliers Wood

Green Corridors

These Green Corridors are illustrated on the Policies Map.

Green Corridors

Site	Name	<u>Area</u> <u>Neighbourhood</u>
GC01	Beverley Park	Raynes Park
GC04	Merton Park Railsides	Morden
GC05	Mitcham Common	Mitcham
GC06	Cricket Green & The Canons Recreation Ground	Mitcham
GC08	Mitcham Sports Ground	Mitcham
GC09	Morden Cemetery	Morden
GC10	Morden Park <u>and surrounds</u>	Morden
GC12	Mostyn Gardens	Morden
GC13	Phipps Bridge and London Road Playing Fields	Mitcham
GC14	Ravensbury Park	Mitcham
GC15	Raynes Park High School	Raynes Park
GC16	Raynes Park Railsides	Raynes Park
GC17	Raynes Park Railsides to Motspur Park	Raynes Park
GC18	Ricards Lodge	Wimbledon
GC19	Ridge Road to Wimbledon Park	Wimbledon
GC22	Wimbledon Common	Wimbledon
GC23	Wimbledon Park	Wimbledon
GC24	Wimbledon Railsides	Wimbledon



CHAPTER 01A INTRODUCTION

Stage 3: publishing the new Local Plan and Policies Map

- 1.1.1. The council believes that this is the right plan for the borough and wishes to adopt it as part of the council's Local Plan. Before doing this, the council has to submit it to the Secretary of State for examination by an independent planning inspector.
- 1.1.2. If you have comments on any issues within the policies, site allocations or land designations that you would like the inspector to consider at their independent examination of the plan, please let us know in writing (post or e-mail) between Thursday **22nd July and Monday 6th September 2021** using the details below:

Via Merton's website www.merton.gov.uk/newlocalplan

Email: future.merton@merton.gov.uk

Post:

FutureMerton
London Borough of Merton
Civic Centre
London Road,
Morden SM4 5DX.

- 1.1.3. You are also invited to state if you would like to attend any examination hearings on Merton's new Local Plan and policies maps or if you would like to be notified when these documents are adopted.

Introduction

- 1.1.4. The Local Plan sets out the council's statutory planning policy framework for the borough. This plan sets out the level of growth, which needs to be planned for in Merton and identifies where that growth should be located and how it should be delivered. The policies set out in the plan will be, used to determine planning applications in the borough. The Local Plan must be, read as a whole document. The placement of the topic chapters and the policies within the chapters is no reflection on their importance or weight – it does not stand for a hierarchy.
- 1.1.5. The Local Plan covers a range of matters, including, ~~the number of~~ the homes (including affordable) and employment provision needed and where they should be, located. It also sets out policies for the protection and enhancement of the natural and historic environment, the provision of supporting infrastructure for growth and other policies to manage change in local areas including town centres, industrial areas neighbourhoods and the borough generally.
- 1.1.6. This plan will be used to promote, shape and manage growth in Merton for the next 15 years. Policies in the plan set out how the council will seek to achieve an appropriate balance between physical, social, economic and environmental protection in Merton for the benefit of all residents and stakeholders.
- 1.1.7. Once adopted the Local Plan will supersede all existing policies in Merton's Core Planning Strategy (2011), Sites and Policies Plan (2014) and the Policies Map (2014). Together with the London Plan, the South London Waste Plan (once ~~they are~~ adopted) and the Estates Local Plan; the Local Plan will form the Statutory Development Plan under section 38 of the 2004 Planning and Compulsory Purchase Act for Merton.

National Policy

- 1.1.8. Local Plans must be consistent with the national policy set out within the [National Planning Policy Framework \(NPPF\)](#). The NPPF sets out the principles and objectives that are required to underpin approaches to plan-making and development management. Central to this, within the NPPF is the “presumption in favour of sustainable development” that establishes in general terms that:
- Local Plans should positively seek to meet the development needs of their area and meet objectively assessed needs (such as housing growth) unless the harm of doing so would demonstrably conflict with the NPPF itself; and

- Decision-taking should see that proposals that accord with development plans are approved without delay, and where plans are silent or out-of-date on an issue, permission should be granted for development.

- 1.1.9. In accordance with the NPPF (para 20), the key strategic priorities that the local plan must address **must** include the following:
- a. Housing (including affordable housing), employment, retail, leisure and other commercial development.
 - b. Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).
 - c. Community facilities (such as health, education and cultural infrastructure); and
 - d. Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 1.1.10. [The London Plan](#) is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London (“the Mayor”) in accordance with the Greater London Authority Act 1999 (as amended) (“the GLA Act”) and associated regulations. Within the London Plan, the Mayor sets out designations, planning policy requirements, targets and instructions that boroughs must include in their Local Plans.
- 1.1.11. The Local Plan must also be in ‘general conformity’ with the London Plan, and where appropriate, take account of Supplementary Planning Guidance (SPG). The Mayor of London produces other strategies to sit alongside the London Plan.
- 1.1.12. The afore mentioned statutory planning documents set out what mitigation measures are needed and if, any assessment(s) is needed to assess the potential impact such as environmental of a proposed development. Therefore, it is not necessary to have the same policy at local level.

Neighbourhood Plans

- 1.1.13. Neighbourhood Plans are plans prepared by the community, which set out the detailed planning policies and proposals for their specific area. Policies and proposals within Neighbourhood Plans must be in general conformity with the local plan.

- 1.1.14. ~~At the time of writing (June 2021), the council's public consultation has just been completed on PlanWimbledon proposal to form a neighbourhood forum for their proposed neighbourhood area of Wimbledon. More information can be found on Merton's website: [Neighbourhood plans \(merton.gov.uk\)](https://www.merton.gov.uk/Neighbourhood-plans)~~

Merton Local Plan contents

Strategic Objectives: guided by consultation feedback, Merton's Sustainable Community Strategy (known as the Community Plan) and the London Plan 2021

- 1.1.15. **Strategic policies** are borough-wide policies, which set out Merton Council's strategy to work with local people, businesses and key stakeholders to improve neighbourhoods and create new opportunities for the future.
- 1.1.16. **Development policies** gives further detail that is, needed to deliver the strategic policies.
- 1.1.17. **Site allocations:** Site allocations sets out land use requirements for sites that will contribute to the borough's growth.
- 1.1.18. **Policies Map:** The Policies Map shows planning designations where specific planning policies are applied.
- 1.1.19. Merton produces an Authority Monitoring Report (AMR) every year that analyses how our planning policies are performing. [Local Plan \(merton.gov.uk\)](https://www.merton.gov.uk/Local-Plan) Once this Local Plan is adopted the AMR will monitor the new policies.

Previous consultation on Merton's Local Plan and Policies Maps

- 1.1.20. ~~Three stages of Public consultations [stages of the Local Plan](#) have already taken place in developing Merton's new Local Plan and policies map:~~
- A "[call for sites](#)" [Stage 1 public consultation](#) took place between October 2017 and January 2018. This was the first stage, asking general questions about what sites or what policies the Local Plan might contain. Over 1,000 responses were received
 - A [Stage 2 draft Local Plan public consultation](#) took place between October 2018 and January 2019. It contained draft policies, potential sites for allocation and land designations (e.g. town centre boundaries) Approximately 240 respondents raised over 1,500 separate points.
 - A [Stage 2a draft Local Plan public consultation](#) took place ~~between~~ **from** 13th November 2020 to 1st February 2021. Although the consultation finished on 1st February 2021, the council continued to accept responses after the consultation date in recognition of the difficult situation people are going through with Covid19 and that the sustainability

appraisal document was not visible without password protection online until 4th January 2021 due to an IT issue.

What happened to my comments?

- 1.1.21. Thanks to everyone who took the time to respond to the three earlier consultations on sites, planning policies and the Policies Map.
- 1.1.22. All the comments received are available on [Merton Council's website in the New Local Plan section](#).
- 1.1.23. Your comments have helped to inform the sites, policies and maps in this document, which have been amended following your feedback, local research and national and regional policy changes.

Stage 3: publishing the new Local Plan and Policies Map

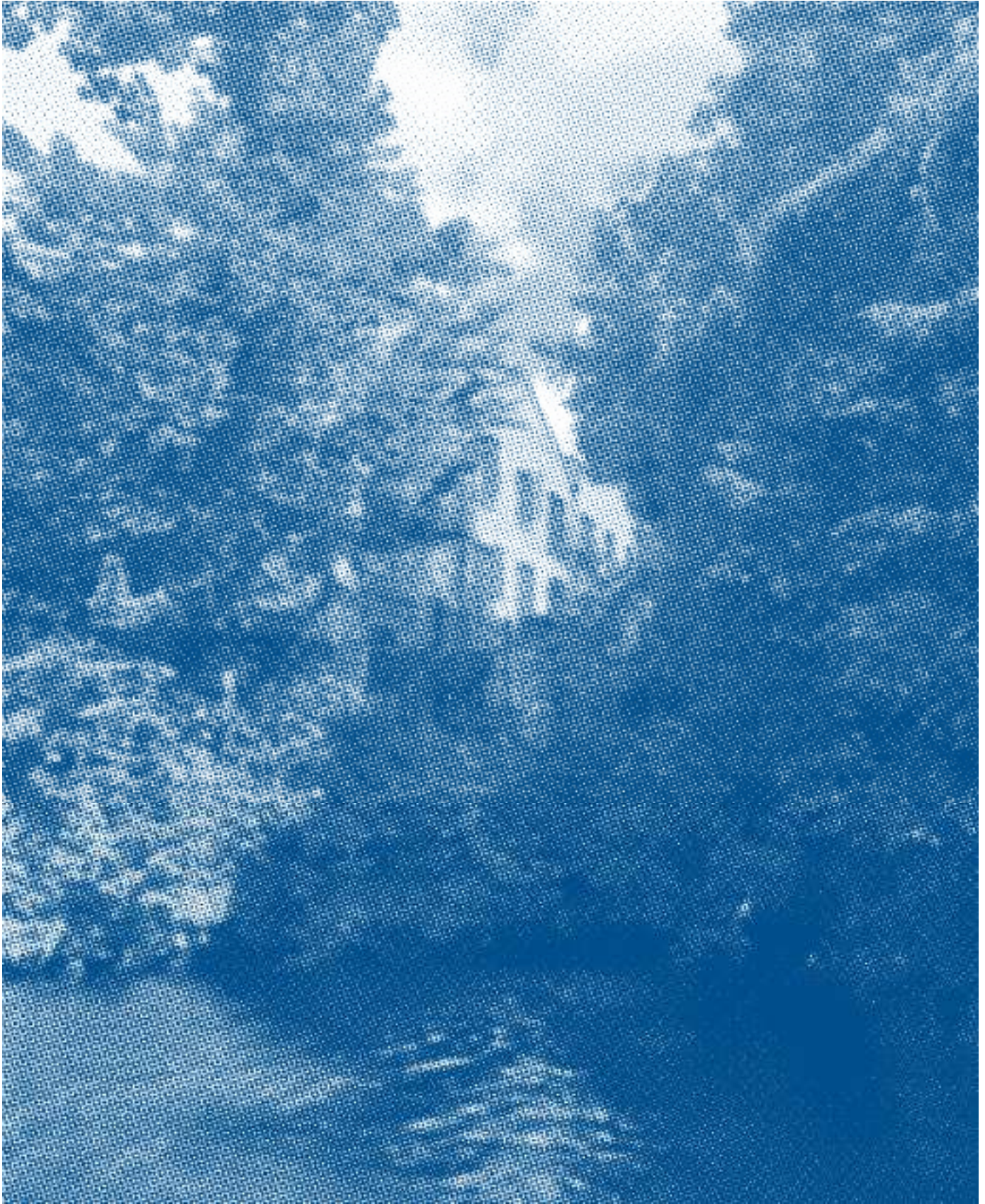
- 1.1.24. The council believes that this is the right plan for the borough and wishes to adopt it as part of the council's Local Plan. Before doing this, the council has to submit it to the Secretary of State for examination by an independent planning inspector.
- 1.1.25. If you have comments on any issues within the policies, site allocations or land designations that you would like the inspector to consider at their independent examination of the plan, please let us know in writing (post or e-mail) between Thursday **22nd July and Monday 6th September 2021** using the details below:

Email: future.merton@merton.gov.uk

FutureMerton
London Borough of Merton
Civic Centre
London Road
Morden. SM4 5DX.

- 1.1.26. You are, also invited to state if you would like to attend any examination hearings on Merton's new Local Plan and policies maps or if you would like to be notified when these documents are adopted.

Please be aware that this Local Plan does not contain a chapter 8.



CHAPTER 01B. **GOOD GROWTH**

Good Growth

The London Plan seeks to promote 'Good Growth' in London. By, building strong inclusive communities, making the best use of land, creating a healthy city, building more homes and affordable housing to address the housing crisis, growing and maintaining a strong economy, increasing efficiency and resilience by moving towards a net-zero carbon city by 2050 and adapting to the impacts of climate change.

Dealing with such a level of growth is undoubtedly a huge challenge, putting pressure on land, housing, infrastructure and the environment. It also comes as we are facing other unprecedented challenges: Brexit, Coronavirus (COVID-19), its impact and the following recovery, air pollution, climate change and entrenched inequality.

The local plan seeks to ensure that Merton's future growth is, planned in a sustainable way in accordance with the London Plan Good Growth principles. This includes maintaining a good balance between economic, social and environmental objectives, creating liveable attractive places for people to live, study, work and visit, as well as delivering our ambition of becoming a net-zero carbon borough by 2050, and creating resilient and adaptive environments, in response to the Climate Emergency for the benefit of all in Merton.

Ensuring we plan and support predicted population growth, increase demand for affordable homes, the impacts of the Covid-19 pandemic – its impact on people especially in deprived areas and COVID recovery and the need to enable job creation. Delivering development, which meets the needs of the present without compromising the ability of future generations to meet their own needs.

It is imperative that future growth in Merton must be **socially** and **economically inclusive** and **environmentally sustainable** and, contribute to the London Plan Good Growth Objectives.

- GG1 Building strong and inclusive communities.
- GG2 Making the best use of land.
- GG3 Creating a healthy city.
- GG4 Delivering the homes Londoners need.
- GG5 Growing a good economy.
- GG6 Increasing efficiency and resilience.

~~All development proposals in Merton, large or small, must accord with all relevant policies of this Local Plan and all other documents such as Supplementary Planning Documents (SPDs) which, make up Merton's Statutory Development Plan.~~

The Sustainable Development Goals (SDGs) and London

[The UN Sustainable Development Goals \(SDGs\)](#) set ambitious targets to create transformative *social, economic* and *environmental* improvements by 2030. They provide an integrated framework covering a comprehensive range of issues – jobs, housing, inequalities, healthcare, the environment and more supported by targets and performance indicators. The SDGs were agreed unanimously, in 2015 by the UN’s 193 member states, including the UK (United Kingdom), within ‘Agenda 2030’ – a landmark UN Resolution on achieving sustainable development. The London Sustainable Development Commission (LSDC) was established in 2002 to provide independent advice to the Mayor of London on ways to make London a sustainable, world-class city.



[In March 2021, the London Sustainable Development Commission](#) published a progress report on how far London has come to meeting the SDGs. We will continue to work with and support the London Sustainable Development Commission on achieving the SDGs. Cities and local governments, businesses, the public sector, communities and others – and coordinated local action on the SDGs has indeed been gathering momentum in recent years. According to the UK Government, 65% of the SDGs rely on local level implementation. For the first time, the impacts and opportunities of cities and towns have been recognised in the SDGs by countries and the United Nations. This has resulted in a global goal entirely dedicated to urban areas in the form of SDG (Sustainable Development Goals) 11: Sustainable Cities and Communities.

As acknowledged by the Royal Town Planning Institute (RTPI), planning has a key role to play in the successful implementation of the SDGs because of the profession's aim to work in the wider public interest and the overall purpose of the UK planning systems to achieve sustainable development. The goals provide an opportunity to strengthen commitment to plan for sustainable development. Merton will continue to work with the Mayor of London and partners in achieving the SDG's for London.

Growth in Merton

All growth in Merton is expected to be **socially** and **economically inclusive** and **environmentally sustainable** and contribute to the London Plan Good Growth Objectives.

The effects of growth will be considered, ensuring that any significant impact is avoided, or necessary mitigation measures employed. Delivering high quality, sustainable and resilient places through good design and effective master planning and/or Neighbourhood Plans will be essential for future growth in Merton.

Stakeholders and partner organisations

Responsibility for the successful implementation of the policies and delivering growth in Merton falls not only upon the council in its role as Local Planning Authority but also upon our partners and other stakeholders, including neighbouring boroughs, the Greater London Authority (GLA) and other public and private sector organisations, especially on strategic matters. We will work with community groups and organisations across Merton's diverse communities ~~(faith and ethnicity)~~ including resident and business association, neighbourhood forums, cultural organisation, disability groups, faith groups, children, young people, and the veteran community at Haigh Homes to deliver growth, as well as healthy and sustainable neighbourhoods.

Landowners and developers will be important partners in the regeneration and growth of the borough. Much of the land in the growth areas are, held by private landowners and their commitment and active involvement for the growth in the borough is needed. We will continue to engage with landowners to support the delivery of this Local Plan.

We will consider joint development schemes with private landowners or developers holding adjacent or nearby sites which could involve joint ventures to deliver new homes, community uses and business spaces.

Merton Council's pro-active planning approach to delivering sustainable growth will be supported by several planning documents and detailed guidance, where appropriate for example:

- Local Plan documents.
- Supplementary Planning documents (SPDs).

- Opportunity Area Planning Frameworks (OAPFs) and Development Briefs.

More detail on planning frameworks can be found in the relevant sections of the Local Plan and more detail on the schedule can be found within Merton's [Local Development Scheme](#)

Coronavirus pandemic (COVID-19)

Growth will need to positively contribute to Merton's COVID-19 recovery. The pandemic has accelerated changes in shopping habits, provision for homes especially affordable, jobs and training and behavioural changes in lifestyles and travel. Therefore, it is important that recovery and growth are sustainable, and do not simply rebuild existing systems that drive inequalities or harm our environment.

Our health inequality gap is growing; this trend was known before Covid-19 however the pandemic has increased it and highlighted the issues across the UK. Residents suffering from poor health in Merton are concentrated in our deprived wards mainly in the east. Addressing these inequalities and improving Merton's health and wellbeing, both physical and mental, goes beyond improving access to medical facilities and includes a range of measures to improve our social and physical environment.

Climate change

We must face up to the reality of the Climate Emergency and the need to limit Merton's contribution to this major global problem. Tackling climate change and its consequences is one of the priorities for the local plan. The challenge for planning is providing much needed homes and jobs in a way that does not have a detrimental impact on our climate and environment.

Merton is already experiencing the impacts of climate change with an increase in the frequency and severity of extreme weather events including extended periods of hot weather and drought, and extreme rainfall and flooding events. Climate change already affects the way we do things and will continue to do so as the scale of global warming increases. New developments will therefore need to prioritise sustainable design and construction to mitigate and adapt to the impacts of climate change, with energy-efficiency, low carbon energy generation, and climate resilience on an equal footing with aesthetic appeal. Ensuring developments are energy efficient and adaptable to the impacts of climate change, making it cheaper to run and more comfortable to be in, will benefit all especially people with lower incomes and in deprived areas.

The move away from petrol and diesel cars towards greener alternatives needs to be made easier with more electric vehicle charging points, dockless bikes/scooter hire, cycle parking and facilities, in and around our town centres and surrounding areas. The transition to more sustainable modes of travel will help improve our air quality, considerably reduce noise pollution, and improve the health and wellbeing of people who live and work in Merton and visit

the borough.

Delivering growth means prioritising climate change in all planning decisions. Several local plan policies both directly and indirectly address climate change mitigation and adaptation, including our climate change, flooding, air quality, design, green infrastructure, health and wellbeing and transport policies. These policies are supported by a number of strategies including Merton's [Climate Strategy and Action Plan](#) (2020), [Green Infrastructure Study 2020](#), [Air Quality Action Plan](#) and [Strategic Flood Risk Assessment 2021](#)

Healthier and greener environments

Making Merton a healthier and greener borough as well as a fairer one is important. It is why, health inequalities cannot be seen in isolation. As already, stated, our health inequality gap is growing; this trend was known, before Covid-19 however, the pandemic has increased it and highlighted the issues across the UK. Growth in Merton will need to addressing inequalities both income and health.

Making walking and cycling the default choice of travel is essential. Making it easier and safer is important for both physical and mental health but it also contributes to the local economy, relieves stress on the National Health Service (NHS) and helps to tackle climate change.

Merton's green infrastructure and heritage assets not only provide recreational opportunities and improve mental health but also contribute to the character and attractiveness of Merton. The creation of a network of green spaces and other green infrastructure such as street trees provides multiple benefits for biodiversity, nature, recreation, climate change resilience and health and wellbeing. Protecting and enhancing our green infrastructure will help our residents to lead healthier, more active lives and provide access to nature, which is good for mental health.

Our heritage assets and historic environment are irreplaceable and an essential part of what makes Merton a vibrant borough and their effective management is a fundamental. The historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the local economy, culture and our quality of life.

Design must consider safety and security, layout and orientation, public realm, social inclusion and environmental health impacts such as noise and air quality to ensure we are creating healthy neighbourhoods, which are accessible for all. The potential harmful effects to human health such as, loss of daylight and sunlight, loss of privacy, loss of outlook, overcrowding, isolation, exposure to odours, noise and vibration must be, considered in design.

All development, be it housing, commercial or infrastructure, must be designed and delivered in a way that contributes to nature and our heritage assets, not their decline.

Delivering growth means prioritising health and wellbeing in all planning decisions, including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality.

Healthy and green approaches are embedded into a number of local plan policies both directly and indirectly for example design, health and wellbeing, transport and green and blue infrastructure policies. This is, supported by, a number of Merton's strategies for example: Green Infrastructure Study 2020, [Joint Strategic Needs Strategy](#) and [Borough Character Study 2021](#).

The Mayor will be developing a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth. ~~Merton Council supports this approach and will work with local communities; the Mayor and partners to protect and enhance our rich heritage.~~ [Merton Council supports a London-wide Heritage Strategy and we will work with the Mayor and communities in developing the strategy.](#)

More homes and jobs

The growth in population and jobs has not been, matched by the growth in the number and type of homes Merton needs. The cost of renting and house prices have risen to levels that have priced many out of the market. Merton's expected growth and development is shaped by the decisions that are made by Merton's planning committee and planners. Every individual decision to provide affordable housing helps to make the housing market fairer, reducing overcrowding and homelessness. Securing more homes is a priority, especially genuinely affordable homes which meet the actual needs of our diverse communities.

A large portion of residents before the pandemic travelled out of the borough to work. The pandemic has changed our work patterns and trends, but as we come out of lockdown people will begin to travel out of borough to work again. It is not, known if the levels will be the same as before the pandemic. However, alongside this, it is important that Merton residents, particularly those from disadvantaged backgrounds, fully benefit from the diverse range of opportunities economic growth brings. Removing barriers to local employment can improve resident's life chances and help support local business growth.

We will therefore use the opportunities offered by new development, in both the construction and operational phases, to improve residents' access to skills, training and employment. This will include seeking financial contributions towards employment, education and skills initiatives, and on larger schemes, requiring apprenticeships and job placements in accordance with targets set out in an agreed Employment and Skills Plan. Securing job placements within the end use of a development, rather than solely in the construction phase will be important to ensure residents fully benefit in the long term from the diverse opportunities economic growth brings.

Delivering growth means setting the conditions to deliver more homes, supporting business, providing opportunities for more jobs, employment and training. A number of local plan policies deliver this both direct and indirectly for example housing, economy, design, health and wellbeing and transport. This is, supported by a number of Merton's strategies such as Green Infrastructure Study 2020, [Joint Strategic Needs Assessment](#), and Merton's emerging housing delivery strategy.

Supporting infrastructure

Ensuring we have the infrastructure and services to meet the needs of our growing and aging population is important such as transport, utilities, broadband, education and health. Delivering growth means ensuring we have the right infrastructure to meet our needs for now and in the future. Careful planning together with our partners and stakeholders will make Merton more efficient and more resilient, preparing it for the future.

The right infrastructure is also, needed to help businesses succeed, grow and remain in Merton. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening new markets and allowing more flexible working.

An [Infrastructure Delivery Plan \(IDP\)](#) has been prepared alongside the Local Plan; this is a 'live' document. It sets out the borough's key infrastructure requirements, anticipated costs and expected delivery based upon partnership working with stakeholder and utilities providers throughout the Local Plan process. The IDP will be, monitored and reviewed on a regular basis to reflect the current circumstances and to inform the development management process. The Infrastructure Schedule contained in the IDP sets out an overview of the key infrastructure requirements necessary to support regeneration in the borough.

A number of planning policies (both direct and indirectly) help to deliver infrastructure for example green and blue infrastructure, design, health and wellbeing and transport. This is, supported by, a number of Merton's strategies such as Merton's Green Infrastructure Study 2020, Joint Strategic Needs Assessment, and Merton's Infrastructure Delivery Plan.

Making the most of our limited land

We will promote and ensure the most efficient use of land and development while also looking to improve the quality of our environment, protect the amenity of occupiers, neighbours and meet planning aims. It is important that development deliver not only homes, but also the infrastructure to support the new homes, employment and business spaces, which create resilient and sustainable communities.

Applying a design-led approach to determine the optimum development capacity of sites is essential to improve the quality of our environment (physical and natural), protect the amenity of occupiers, neighbours and meet planning aims.

Density and mixed uses

We will expect high quality developments with higher densities, where appropriate, that can, appropriately be delivered by the efficient use of land, particularly in neighbourhoods with good accessibility to public transport and in Merton's Opportunity Area. In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, ~~Morden~~, South Wimbledon, Morden and Colliers Wood will generally expect densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting, while having regard to the borough's acute housing needs.

The provision of a suitable mix of uses can contribute to successfully promoting growth in Merton and importantly, make better use of our limited land. A mix of uses can:

- Increase the provision of much needed homes including those that are genuinely affordable.
- Promote healthy and active neighbourhoods that have a range of activities that are used throughout the day such as entertainment, culture and restaurants.
- Increasing safety and security.
- Reduce the need to travel, reducing the need for some journeys, helping to cut congestion in the borough and improve air quality.

In accordance with the London Plan 2021, taller buildings are one form of high-density development that can be appropriate in some the locations identified in this plan, subject to excellent design, good public transport accessibility and impact on existing character, heritage and townscape. The architectural quality and materials will need to be of an exemplary standard to ensure that the appearance and architectural integrity of the building is, kept through its lifespan.

Identifying Merton's Growth areas

A considerable proportion of Merton's growth up to 2036/37 and beyond is, expected to be, delivered in the Opportunity Area (OA). The OA is, designated in the [London Plan](#) (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton's OA.

OAs are identified as significant locations with development ability to deliver new housing,

commercial development and infrastructure. The town centres found in the OA are suitable for large-scale development and significant increases in jobs and homes as they have particularly good public transport and transport interchanges, for example, Wimbledon town centre. Each centre will make contribute in ways suitable to their location, centre designation and its character.

A clear focus on delivery will require all stakeholders to work together to unlock sites and drive the right sort of development. The council's overall spatial strategy is illustrated in ~~the~~ Figure 1 below. This shows the broad locations of Merton's growth area. Development will still take place outside of the OA, although not at the same scale. Outside the OA, where sites are not allocated, smaller scale development and more incremental change will take place. The following sections provides further detail on the parts of the borough where the most significant growth is expected to take place and the role our centre will play in Merton's growth.

Figure 1 – Merton’s spatial strategy (*Map updated*)



- National Rail Stations
- ⊖ Underground Stations
- Tram Stops
- Railway
- Northern Line Underground
- District Line Underground
- Tram Line
- Rivers
- Other Borough Boundaries

- Economic Centres**
- Town Centre Boundaries
 - Major Centre
 - Town Centre
 - Site Allocations
 - Strategic Industrial Locations
 - Locally Significant Industrial Sites
 - Estate Regeneration
 - Opportunity Area Planning Frameworks
 - Open Space
 - Metropolitan Open Land

Opportunity Area (OA)

The London Plan ambition for Merton’s Opportunity Area of “Wimbledon, South Wimbledon and Colliers Wood” is to deliver 5000 new homes and 6000 jobs (indicative figure up to 2041). It should, be noted that these figures form the starting point from which we can carry out more precise local level exploration of what can be achieved in terms of the OA’s ability to accommodate growth. Importantly, the ambition for the OA is not, predicated on the delivery of Crossrail 2. Merton’s OA is, shown in the Figure below and illustrated on Merton’s policies map.

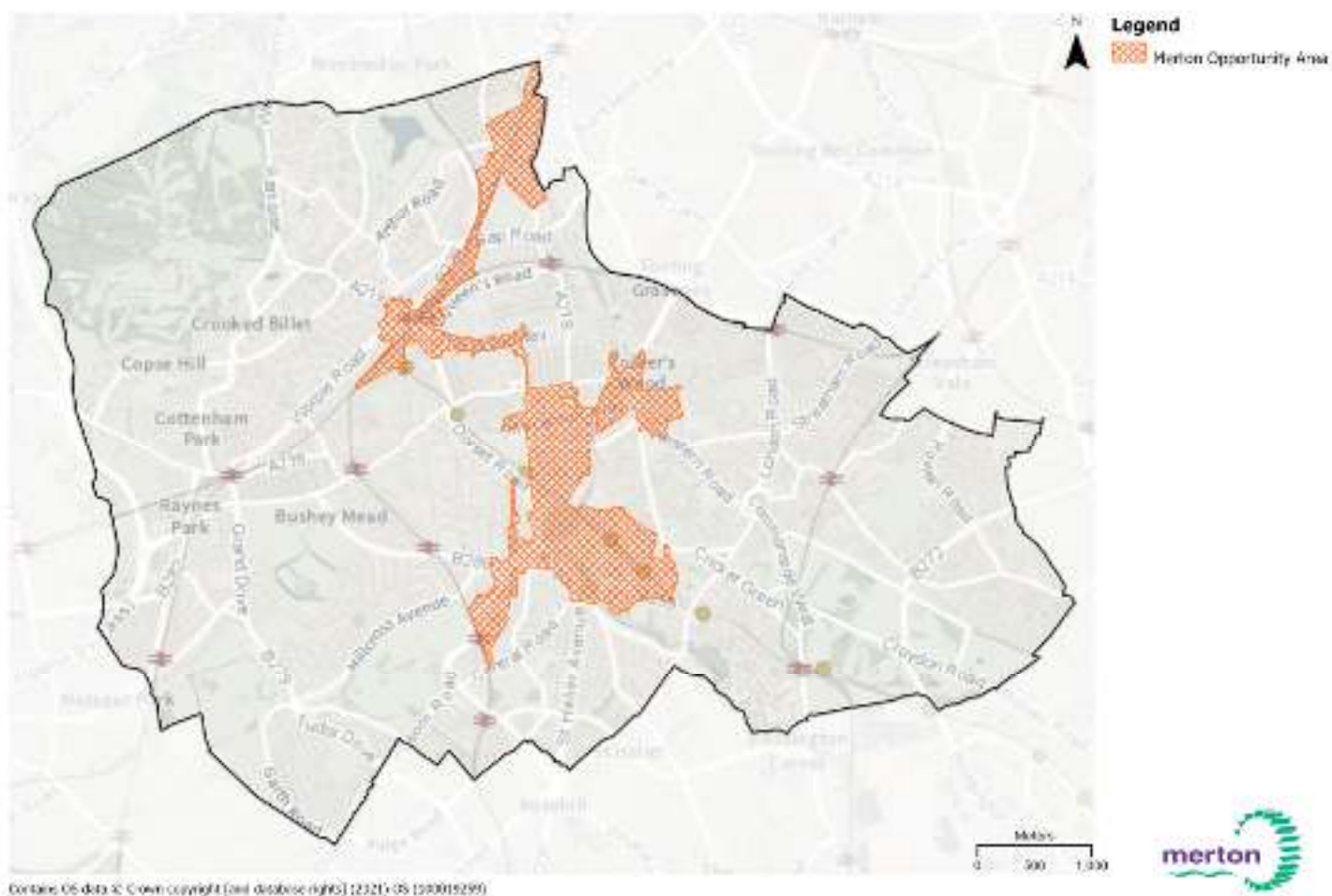


Figure 2: Opportunity Area

To ensure that the OA fully realise its growth and regeneration potential the council will work with the GLA to produce an Opportunity Area Planning Frameworks (OAPFs) in accordance with London Plan policy *SD1 Opportunity Areas*. This plan-led approach, outlining delivery of affordable housing, create mixed and inclusive communities and ensure the OA will contribute to regeneration objectives to tackle spatial inequalities and environmental, economic and social barriers that affect the lives of all.

The OAPF will be prepared in a collaborative way with Merton's diverse communities (including children and young people, Black, Asian and other ethnic minority groups, businesses and stakeholders). The key priorities for an OA, as outlined in the London Plan, are to:

- Maximise the delivery of affordable housing and create mixed and inclusive communities.
- Contribute to regeneration objectives by tackling inequalities and environmental, economic and social barriers that affect the lives of people in the area.
- Facilitates ambitious transport mode share, targets.

Wimbledon

Wimbledon is designated a Major town centre and classified as a centre for high residential and commercial growth in the London Plan (London Plan Table A1.1 - Town Centre Network). Therefore, Wimbledon will be, expected to continue to secure the development of high quality and attractive schemes. Wimbledon will become a safe and healthy place (including at night), providing a balance of mix of uses, delivering new homes including affordable, provision for flexible workspaces/hubs and offices to meet changing work patterns following the pandemic and create and secure employment and skill training opportunities. In addition, we will:

- Maintain and create public space and greening (including appropriate tree and shrub planting) of the street environment:
 - To improve air quality and help tackle climate change.
 - To improve the health (including mental health) and wellbeing.
 - To help-mitigate flooding from all sources.
- Support the highest quality development that preserves local amenity, enhance and conserve Wimbledon rich heritage assets, character and appearance of place.
- Through town centre management initiatives, we will endeavour to ensure that the night-time economy is managed in a way that, benefits residents, visitors and businesses working with local communities and stakeholders.
- Maximise opportunities to enable walking and cycling with improved network of safe and attractive greener places and routes.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by using Secure by Design.
- Work with construction sites to minimise and improve air quality and noise pollution.

- Encourage and enable travel behavioural changes by providing electric car charging points, more cycle parking facilities and improve road safety for all. Working with communities, TfL, GLA and other stakeholders to create a safe network for walking and cycling.
- Work with LoveWimbledon Business Improvement District and the Wimbledon Village Business Association to support the economic recovery, encourage business resilience and promote both local business and the area as a business location.
- ~~Work with Network Rail and Transport for London on the plans for Crossrail2 to ensure it maximises the benefits for Wimbledon, Raynes Park, Wimbledon Chase and Motpur Park.~~

Colliers Wood

Colliers Wood town centre is designated as a District Centre and classified 'Medium' for commercial growth and 'high' for residential growth in the London Plan (London Plan Table A1.1 - Town Centre Network). Colliers Wood neighbourhood will build on its diverse mix of communities and culture, local and independent shops, small businesses and its rich heritage. In addition, we will:

- Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health - providing a mix of uses, including substantial new homes (including affordable), employment and social and community uses.
- Maintain public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - Improve air quality and help tackle climate change.
 - Improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by using Secure by Design.
- Enable travel behavioural changes by providing electric car charging points and cycle parking facilities. Enable more pedestrian and cycle movement, routes and choices - making walking and 'way-finding' easier for all.
- Provide sustainable and safe design of the highest quality that respects the character and heritage assets including the town centre. Working in partnership with cultural, historical and

heritage organisations to promote the history of Colliers Wood - its historical links at Merton Priory and industrial heritage of William Morris and the Wandle Trail.

- Significant increase in the number of jobs and training provided in the area. - Provide employment space for identified growth sectors and small to medium enterprises and start-ups and contribute towards training and apprenticeship opportunities.
- We will continue to work with Transport for London (TfL), to improve roads in the borough and including Colliers Wood. We will seek external funding to improve safety and movement around the town centre and other busy street in the neighbourhood to improve and increase more walking and cycling, with the aim to improve air quality and improve the health of all.

South Wimbledon

South Wimbledon will become a vibrant, attractive and thriving new local centre that builds on its location between Colliers Wood and Wimbledon. Growth in this neighbourhood will need to contribute to improving the deprivation found here. In addition, we will:

- Make more efficient use of land, taking opportunities to provide a mix of uses, including new homes (especially affordable homes) and affordable and flexible employment floor space.
- Enable and create the development of a '20 minutes' neighbourhood'.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - Improve air quality and help tackle climate change.
 - Improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Create opportunities for jobs and training for all by supporting for local businesses and new enterprises opportunities.
- Promote its local identity and links to its history and environment through design and layout having regard to established local character.
- Enhanced and improve connectivity and public realm, with more active frontages along Merton High Street.

Morden

Morden is, designated as a District centre and classified as low for commercial growth and high for residential growth in the London Plan (London Plan Table A1.1 - Town Centre Network). The Morden Regeneration Zone (~~town centre~~) is, expected to deliver circa 2000 new homes. In addition, we will:

- Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health by delivering a mix of uses, including affordable homes, offices and other employment opportunities, social **and** community facilities and retail to support new homes.
- Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Deliver excellent public realm, with an improved network of safe and attractive places and routes for pedestrians and cyclists to enable and encourage more sustainable travel link to neighbouring areas and reduces the dominance of traffic in the area.
- Deliver high quality homes, **which is** sympathetic to historic area which preserve local amenity and look to enhance and conserve the significance of heritage assets such as the character and appearance of conservation areas and National Trust park.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour using Secure by Design.
- Improve cycling facilities, enabling more walking and cycling, and work with Transport for London (TfL) in improve road safety on road for all users and the pedestrians to and around Morden Underground station.
- Maximising densities compatible with local context, sustainable design principles and public transport capacity.
- Explore the development of a decentralised energy network for the town centre.

Outside the Opportunity Area

Mitcham neighbourhood

Most of the Mitcham neighbourhood lies outside the Opportunity Area (see Figure 2) aside from parts of the neighbourhood around Church Road and bordering Morden. Growth in this neighbourhood should contribute to the council's wider vision and objectives for this part of the borough. Mitcham town centre is designated as a District centre and classified as 'low' for commercial growth and, 'high' for residential growth in the London Plan (London Plan Table A1.1 - Town Centre Network). Growth in this neighbourhood must positively contribute to reducing the deprivation found here. In addition, we will:

- Reduce inequalities in the neighbourhood and improve the wider determinates of health by providing a mix of uses, including substantial new homes (including affordable), employment and social and community uses.
- Create thriving 20 minutes' neighbourhoods with local services, which preserves local amenity.
- Make more efficient and intensive use of land, taking opportunities to provide a mix of tenure of new housing -especially affordable homes and provide flexible employment floor space, which will provide jobs and training to improve the income deprivation.
- Explore opportunities for social housing estate regeneration. We will engage and work with housing providers in Mitcham neighbourhood. The Council's ambition is that regeneration will focus primarily on improving the quality of housing stock but also offers the potential to create an improved physical environment and enhanced connectivity as well as address several social and economic issues. ~~This is a long-term aspiration which will continue outside this plan period.~~
- Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - Improve air quality and help tackle climate change.
 - Improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour using Secure by Design.
- Support local businesses, new enterprises/start-ups to create a better mix of market/retail offer in the town centre and local shopping parades.
- Ensure community and social facilities, are coordinated and tailored to meet local needs and contribute to tackle the health and income inequalities in this neighbourhood.

- Improve local accessibility and interchange at the Mitcham stations (Eastfields and Mitcham Junction) with enhanced walking, cycling and bus routes to improve the town centre footfall.

Raynes Park neighbourhood (including West Barnes)

Growth in this neighbourhood should contribute to the council's wider vision and objectives for this part of the borough by:

- Creating a thriving a walkable neighbourhood or '20 minutes' neighbourhood' with local services, which preserves local amenity.
- Maintaining and creating new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - Improve air quality and help climate change.
 - Improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Creating safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Supplying a balanced mix of uses, including housing and affordable housing, employment opportunities, community facilities, and retail.
- Supporting local businesses and new enterprises.
- Delivering excellent public realm, with an improved safe route networks which enable and encourages cycling and walking with the needed infrastructure to encourage people to adopt sustainable travel such as cycling and scooter parking and facilities.

Wimbledon Chase

Development in this area must contribute to the council's wider vision and objectives for this part of the borough by:

- Working with transport partners, such as Transport for London (TfL) and Network Rail to relieve congestion in Kingston Road, and explore Wimbledon Chase Station capacity upgrade and step free access.
- Creating a thriving local centre which will become a walkable neighbourhood or '20 minutes' neighbourhood' which will contribute to reduce poor air quality and improve the

health for all.

- Creating safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Maintaining and creating new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - Improve air quality and help tackle climate change.
 - Improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Providing the highest quality that preserves local amenity, enhance and conserve Wimbledon Chase heritage assets, character and appearance of place.
- Creating a more vibrant, attractive area that builds on its location between Raynes Park and Wimbledon and its transport links.
- Enhancing connectivity and public realm, with more active frontages along Kingston Road to support businesses and encourage shoppers.
- Making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new homes.

Wimbledon Village

The village will maintain its competitiveness without altering its unique green village character of equestrian pursuits, outdoor activities, book festivals and other cultural events, farmers' markets and Wimbledon Common. Whilst development opportunities here are relatively limited, Wimbledon Village will continue to contribute to local economy with its mix of independent shops and cafes, retail and social venues, while respecting it's the character. Wimbledon Village will play a key role as the borough historical and sporting tourist destination.

- Maintaining and creating new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - Improve air quality and help tackle climate change.
 - Improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Greener transport opportunities such as electric charging points and cycling parking facilities.

- Prioritise and promoting walking and cycling to reduce pressure on car parking and improve accessibility.
- Supporting independent retail, business and leisure active for example equestrian and other pursuits.



01C. URBAN DEVELOPMENT OBJECTIVES AND VISION

Urban development objectives

The Strategic Objectives apply to the whole of Merton and provide a framework for the Local Plan, acting as stepping stones to deliver the Spatial Vision. Consultation responses, Merton's Community Plan, and the London Plan (2021) have guided Merton's strategic objectives.

Strategic objective 1: tackling climate change

To make Merton an exemplary borough in mitigating and adapting to climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.

We will achieve this by:

- a. Ensure that development in Merton minimises its energy use by encouraging local efficient energy generation, achieving the highest possible environmental standards and is designed to adapt to, and reduce the effects of, climate change.
- b. Minimising energy demand, water use and greenhouse gas emissions, maximising renewable energy generation and prioritising re-use of existing building materials where possible to minimise resource use and waste.
- c. Being resilient to the future impacts of climate change in order to minimise vulnerability of people and property; this includes the risk of flooding, water shortages, subsidence and the effects of overheating.
- d. Promoting circular economy to ensure that resources are kept in use at the highest level possible for as long as possible in order to consume fewer resources and minimise waste.
- e. Applying the waste hierarchy to ensure that waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location using the most appropriate means.
- f. Supporting sustainable energy infrastructure to produce energy more efficiently and utilise energy from waste.
- g. Promoting the retrofit of greater improved energy performance to existing buildings and greater connections with renewable and decentralised energy.

Strategic objective 2: supporting resilience

To support those who live, work and study in Merton in resilience and recovery, to create the conditions for growth and to direct the benefits of this growth so it best meets the needs of Merton's communities

We will achieve this by:

- h. Building more well-designed new homes, particularly affordable homes that meet the needs of households on the council's waiting list and help address the housing crisis.
- i. Requiring new homes and buildings to be sustainable, significantly reducing carbon emissions and resident's energy bills, towards achieving Merton's net zero carbon target in Merton's Climate Change Strategy
- j. Supporting investment in high streets and business areas, providing a platform for businesses and jobs recovery after Covid19 and beyond
- k. Protecting and improving the borough's parks and ensuring public access to formerly private open spaces. Improving access to nature and leisure facilities, including opportunities for sport, physical activities, play and relaxation to help boost people's physical and mental health
- l. To support the existing and future successful development of our town and neighbourhood centres, while adapting to changes in their role and how people shop.

Strategic Objective 3: places for people

To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space.

We will achieve this by:

- a. Delivering quality new homes, associated infrastructure and social facilities that respect and enhance the local character of the area, in places with good public transport access;
- b. Delivering social and community services and infrastructure to support new homes through new development and the effective use of space;
- c. Providing a choice and mix of homes which are accessible, adaptable and sustainable, which apply high quality design standards to meet the needs of Merton's diverse communities;

- d. Ensuring that development makes the most efficient use of brownfield land and that is designed at the optimum density, considering site context, connectivity by walking, cycling and public transport and access to amenities and services.
- e. ~~Assessing the impact of~~ **Requiring** major development proposals **to maximise the positive impacts and minimise adverse impacts** on physical and mental health and wellbeing ~~to maximise the positive impacts and minimise adverse impacts.~~
- f. Working with key stakeholders such as our local Metropolitan Police Service 'design out crime' officers and planning teams, Emergency Planning Authority and British Transport Police to identify community safety needs, policies and sites required for their area and support provision of necessary infrastructure to maintain a safe and secure environment

Strategic objective 4: good growth

To create the conditions for growth, ensuring it takes place in the most appropriate and sustainable locations, minimises the impacts of development, and to direct the benefits of this growth so it meets the needs of Merton's communities for homes, jobs, services and preserves and enhances the borough's unique character and appearance. We will achieve this by:

We will achieve this by:

- a. Supporting a diverse local economy and promoting a commercially viable, thriving mix of premises, including shops and services, business and industrial uses that increase jobs and services available to local people.
- b. Promote and support the successful development of the growth areas (Opportunity Area and Morden town centre) and to ensure that all development is supported by necessary infrastructure and maximises the opportunities and benefits for the local and surrounding communities and the borough as a whole.
- c. Supporting sustainable growth of the visitor economy for the benefit of local communities and promoting the borough as an attractive and inviting place to visit and enjoy.
- d. Encouraging and supporting low carbon behaviour in local businesses such as improving the energy efficiency of their buildings, maximising renewable energy generation, promoting sustainable and active travel, working with their supply chains to provide low carbon products and services, and minimising waste.
- e. Enhancing the learning environment to improve access to education, training and jobs

- f. Maximising opportunities for employment and local businesses, focusing on Merton's town centres and main employment areas along the Wandle Valley.

Strategic objective 5: place plans and the 20-minute neighbourhood

To promote a high quality urban and suburban environment in Merton, providing reliable, quality local services in accessible, well designed neighbourhoods.

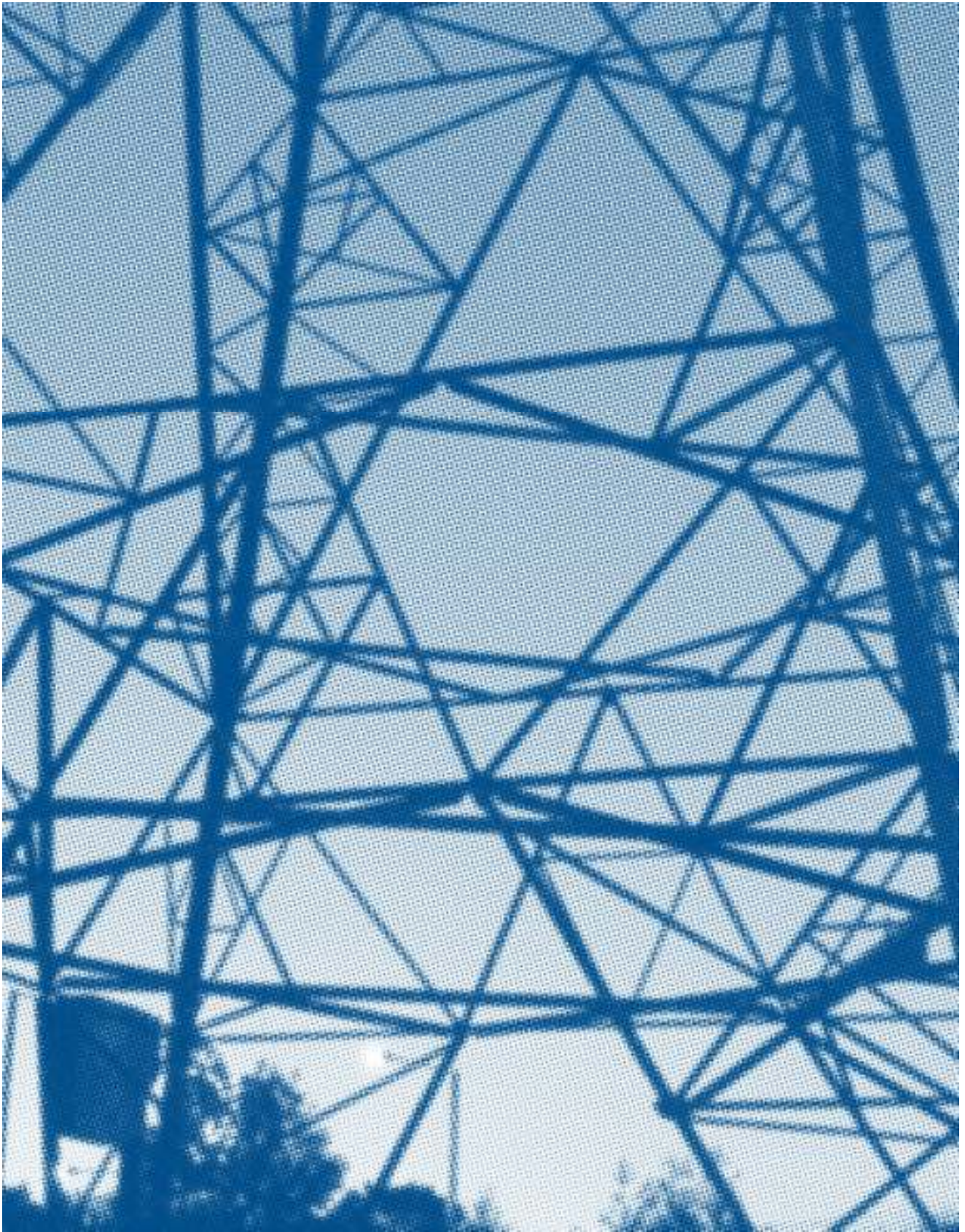
We will achieve this by:

- a. Encouraging low carbon and healthy lifestyles in line with Merton's net zero carbon target by promoting walking and cycling.
- b. Using Transport for London (TfL) Healthy Streets Approach to prioritise health in planning decisions.
- c. Supporting town centres and neighbourhood parades to boost the shops and services within them, working with businesses and residents to manage the changing nature of how we shop and use deliveries.
- d. Delivering community services and infrastructure to support new homes through new development and the effective use of space.
- e. Ensuring that development makes the most, efficient use of land and that is designed at the optimum density, considering site context, connectivity by walking, cycling and public transport and access to amenities and services.
- f. Encouraging improvements to public transport, including quality and connectivity of transport interchanges, support the use of Smart City technology in the public highway and in co-ordinating deliveries.
- g. Conserving and enhancing the unique historic environment, heritage and cultural assets.

Spatial vision

By 2036/37 Merton will:

- Be on our way towards becoming net-zero carbon by 2050 in partnership with other organisations and importantly with our residents:
- Continue to grow the borough's low carbon and circular economy.
- Have minimised greenhouse gas emissions and ensured resilience overheating, flooding and other the impacts of climate change.
- **Improved community health and wellbeing and** reduced health and income inequality within the borough and the disparities between the east and west of the borough.
- Provided new homes meeting the needs of communities - especially more affordable homes for households on the council's waiting list.
- Created attractive safe and secure 20 minute neighbourhoods to live, work, and socialise.
- Created new and improved existing neighbourhoods with a range of mix tenure homes while respecting the local character of each area.
- Improved air quality, minimise noise, flood risk and other polluting impacts, and reduce carbon and water demands by minimising detrimental impacts from development.
- Improved access to our unique rich heritage and historic environment for all, while encouraging innovations in building technology. ~~and improving sense of~~
- Achieved a shift in travel behaviour towards more people walking and cycling, particularly for short journeys.
- Improved interchange between transport modes and incorporating innovative solutions to manage deliveries and the highway network for all users.
- Continue to develop sustainable growth across the Merton and in our growth areas, for all.



CHAPTER 02. **CLIMATE CHANGE**

Strategic Policy CC2.1

Promoting Sustainable Design to Mitigate and Adapt to Climate Change

To make Merton a more environmentally sustainable place and net-zero carbon by 2050 [1], Merton Council aims to reduce greenhouse gas emissions and increase local resilience to the impacts of a changing climate through sustainable design.

This will be achieved by requiring all development to:

- a. Minimise greenhouse gas emissions and support the transition to a low carbon society by maximising energy efficiency, low carbon heat and local renewable energy generation;
- b. Support the principles of the circular economy and promote more effective resource use, to ensure that resources are kept in use for as long as possible and to minimise waste;
- c. Recognise and adapt to Merton's changing climate and ensure that development mitigates the risk of overheating and flooding, and maximises comfort and wellbeing in a changing climate;
- d. Maximise opportunities to enhance green infrastructure and tree planting to deliver multi-functional benefits such as minimising the urban heat effect, enhancing natural carbon sinks and improving air quality; and
- e. Promote healthy and sustainable lifestyles in line with Merton's net-zero carbon target.

Justification Supporting Text

2.1.1 In accordance with ~~Paragraph 149 of the NPPF 2019 and~~ Paragraph 152³ of the Draft NPPF 2021, 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'

A Climate Emergency and carbon reduction targets

2.1.2 In 2018, the Intergovernmental Panel on Climate Change (IPCC) published a Special Report [2] which concluded that global greenhouse gas emissions¹ need to reach net-zero by 2050 in order to keep global temperature rise below 1.5°C and minimise damaging climate impacts on human and natural systems. In May 2019, the Committee on Climate Change (CCC) recommended a new long-term emissions target for the UK: net-zero greenhouse gases by 2050 [3]. Following the adoption of the Climate Change Act 2008 (2050 Target Amendment) Order in 2019, the UK has a statutory requirement to reduce its greenhouse gas emissions by 100% by 2050 (based on 1990 levels) [4].

2.1.3 Furthermore, in his 1.5C Compatible Climate Action Plan 2018 [5] and Environment Strategy 2018 [6], the Mayor of London committed to London becoming a net-zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy.

2.1.4 In July 2019, Merton Council declared a Climate Emergency and committed to working towards becoming a carbon neutral borough by 2050 and a carbon neutral Council by 2030 [7], in line with the national and regional targets mentioned above. Merton's Climate Strategy & Action Plan [1], which was approved by Council on 18th November 2020, sets out the key actions required to achieve these carbon reduction targets across a range of sectors: economy, transport, buildings and energy, and green spaces.

¹ Also referred to throughout the Local Plan as carbon emissions.

- 2.1.5 By 2050, Merton will need to decarbonise activities across all sectors. This will require: a transition to a low carbon and circular economy which promotes the effective use of resources and minimises waste; all journeys using petrol and diesel vehicles will need to be replaced by low carbon alternatives such as cycling and walking, and low carbon vehicles; and emissions from all existing and new buildings will need to be net-zero carbon by minimising energy demand, and meeting all our energy needs using renewable and low carbon energy [1] [8].
- 2.1.6 With some 81% of greenhouse gas emissions in Merton being generated from the energy used to heat and power our buildings, decarbonising our building stock will be a fundamental step in becoming a net-zero carbon borough [1]. The following policies aim to drive net-zero carbon development in Merton through sustainable design. These policies should be read alongside Merton's Design and Housing policies in this Local Plan.
- 2.1.7 However, development should also encourage sustainable lifestyles more broadly. For example, development should reduce the need to travel, particularly by private car, and ensure that the largest possible share of journeys are made by active travel and public transport, as set out in Merton's Travel & Urban Mobility policies. Merton Council also encourages development to support community-led initiatives such as local food growing as set out in Merton's Green Infrastructure and Health & Wellbeing policies.

The role of sustainable design in getting to net-zero carbon

- 2.1.8 All buildings in Merton will need to operate at net-zero carbon by 2050 in order to achieve our carbon reduction target. A building which operates at net-zero carbon does not burn fossil fuels, has ultra-high energy efficiency and is 100% powered by renewable energy [9].
- 2.1.9 Extensive retrofit will be required to decarbonise Merton's existing building stock given that low carbon heat solutions require reasonable levels of energy efficiency (at least an Energy Performance Certificate (EPC) rating of C) [5], and more than three quarters of Merton's 88,000 homes have an EPC rating of D or below [1]. The costs of achieving higher standards via retrofit are three to five times higher than for new buildings and the carbon impact of delayed action is significant [10]. Merton's decarbonisation pathways modelling, estimated that retrofitting Merton's existing building stock would cost in excess of £2.7 billion [8].

- 2.1.10 In order to achieve our carbon reduction target as cost effectively as possible, all new development must therefore be fit for the future (i.e. be ultra-energy efficient and climate resilient, and maximise low carbon and renewable energy) [11]. Any new buildings which are not built to operate at net-zero carbon will require expensive retrofit in the next 30 years.
- 2.1.11 Current housing projections for Merton indicate that a minimum of 11,374 additional homes will be built during the plan period, around 29,000² new dwellings could be built in Merton between 2021 and 2050. Policy must therefore ensure that new development in Merton does not create a legacy of poor performance that will require remedial action in the future and add to Merton's retrofit burden. In their Climate Emergency Design Guide (2020), the London Energy Transformation Initiative (LETI) concluded that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025.
- 2.1.12 Developers must consider sustainability early in the design process in order to maximise energy and carbon savings, and minimise construction and operational costs.

The policy gap and the need for higher local standards

NATIONAL STANDARDS – PART L OF BUILDING REGULATIONS

- 2.1.13 The UK Green Building Council defines a net-zero carbon operational building as follows: “When the amount of carbon emissions associated with the building’s operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset.”
- 2.1.14 There is a significant gap between current building standards (Part L 2013) and the standards required to become net-zero carbon by 2050 [12]. In order to achieve a net-zero carbon balance across the UK housing stock, LETI found that all new development will need to be designed to achieve an Energy Use Intensity (EUI), i.e. energy use measured at the meter, of 35kWh/m²/yr [9]. However, the current Part L average EUI is 140 kWh/m²/yr.

² Refer to Policy H11.2. Based on sites identified to be delivered during the 15-year plan period and an assumed delivery of the Intend to Publish London Plan 2021 target for Merton of 918 new dwellings per year for the remaining 15 years to 2050. See Housing policies for further details.

2.1.15 It is widely accepted that there is a significant performance gap between predicted and actual performance using the Part L methodology [9] [11]. Reasons for this include, but are not limited to, the following:

- Part L does not address emissions associated with unregulated equipment such as fridges, washing machines, cooking equipment, computers, etc. which can represent up to 50% of a building's operational emissions [9]. This means that a building achieving a 100% improvement against Part L doesn't necessarily achieve net-zero carbon operational emissions.
- The relative improvement approach against a notional building used in Part L does not reward more efficient building forms which ultimately provide more energy and carbon savings [12].
- Delays in incorporating up to date carbon factors in Part L can lead to perverse modelling outcomes by overestimating the carbon savings from gas given that the carbon factors currently used in Building Regulations do not take into account the decarbonisation of the electricity grid achieved since 2012 [10]. Part L also overestimates the emissions associated with electricity use over a building's lifetime as it does not consider impacts of further projected reductions in carbon intensity of electricity in coming decades.

2.1.16 In addition, in recent years, policies supporting low-carbon homes, such as Zero Carbon Homes and Code for Sustainable Homes, have been weakened or withdrawn at a national level [11]. Policy proposals encouraging high energy efficiency such as the 'Interim' and 'Full' Fabric Energy Efficiency Standards defined by the Zero Carbon Hub in 2009 [13] have not been enforced through Building Regulations which has led to the development of buildings which are not future-proofed for 2050 [14].

2.1.17 Building Regulations are expected to be updated in 2022 and 2025 but current proposals for the Future Homes Standard 2025 do not address the shortcomings set out above and are not ambitious enough to deliver the savings required to achieve our carbon reduction targets [15] [16] [17] [18].

REGIONAL STANDARDS – THE LONDON PLAN

2.1.18 In order to drive greenhouse gas and energy savings in London, the Mayor has implemented a zero carbon policy for all major residential developments since 2016, and this policy was extended to major non-residential developments in the London Plan 2021. This policy aims to achieve net-zero carbon development in London, however, in practice, there are a number of shortcomings to the policy which must be addressed in order to genuinely achieve our net-zero carbon target:

- A development which achieves a 100% improvement against Part L on site in line with the Mayor's zero carbon policy, does not necessarily achieve net-zero carbon operational emissions given that the current Part L methodology does not account for unregulated emissions [12].
- The London Plan allows for up to 65% of a development's regulated emissions to be offset through cash-in-lieu contributions which shifts the responsibility for offsetting any residual emissions to the local authority [12]. However, in order to achieve our net-zero carbon target, emissions will need to reduce close to zero without offsetting, so carbon offsetting must not be heavily relied upon and should only be considered where further savings cannot be achieved on-site [9] [3].
- The cost of carbon used to offset a development's carbon shortfall included in the London Plan does not incentivise developers to achieve further carbon savings on site as it does not reflect the actual cost of implementing carbon saving measures [12]. This in turn also limits the carbon savings which can be achieved through carbon offset funds and prevents a zero carbon balance from being achieved.
- The Mayor's zero carbon policy only applies to major schemes which represent less than 10% of schemes in Merton. However, all buildings, regardless of the scale of development, will need to be net-zero carbon by 2050 in order to achieve our carbon reduction target.

- 2.1.19 We are committed to driving sustainable design and minimising greenhouse gas emissions through local policies in Merton. Policies CC2.2 *minimising greenhouse gas emissions*; CC2.3 *minimising energy use* and CC2.4 *low carbon energy* are intended to go beyond the London Plan requirements to drive building energy performance which is compatible with our 2050 net-zero carbon target, by maximising on-site savings through energy efficiency and low carbon and renewable energy generation. These policies set out Merton's requirements based on the current Building Regulations (2013) Part L methodology, but also embed recommendations from the Zero Carbon Hub, the CCC 's report on making UK housing fit for the future and LETI's Climate Emergency Design Guide where possible.
- 2.1.20 In addition, as operational emissions decrease with the roll out of low carbon heat and higher energy efficiency standards, embodied emissions will make up an increasing proportion of a development's whole-life cycle emissions. Policy CC2.5 *minimising waste and promoting a circular economy* sets out Merton's requirements to minimise embodied carbon and Policy CC2.6 *sustainable design standards adapting to a changing climate* sets out the sustainability standards required of development in Merton.

Climate adaptation in Merton

- 2.1.21 There is extensive evidence that human-induced global warming has already caused significant changes to the climate system including an increased frequency and intensity of extreme weather events such as heatwaves and heavy precipitation events [2] [3]. This trend is expected to continue as the magnitude of warming increases.
- 2.1.22 Impacts in London will likely include increased heat, flooding and drought, with a greater frequency of severe weather events [19]. In order to ensure climate resilience in our communities and minimise future climate-related human and financial costs, these risks will need to be embedded in how we design the buildings in which we live and work by minimising the risk of overheating, flooding, subsidence and water shortages.
- 2.1.23 We will require all development proposals to demonstrate that they are well designed, fully adaptable and resilient to the impacts of a changing climate, and will not exacerbate any climate change impacts elsewhere.

2.1.24 Climate adaptation has been embedded within the relevant sections of the Local Plan. Overheating of buildings and subsidence are addressed in the Design policies; flooding, water shortages and the urban heat island effect are covered in the Green & Blue Infrastructure policies; and water use from development is addressed in Policy CC2.6 Sustainable Design Standards below.

2.1.25 Merton's climate change policies should be read alongside Chapter 9 Sustainable Infrastructure of the London Plan 2021.

Policy CC2.2

Minimising Greenhouse Gas Emissions

We will require all proposed development within the borough to demonstrate that the fullest contribution to minimising greenhouse gas emissions has been made on site.

This will be achieved by requiring:

All development:

- a. To reduce greenhouse gas emissions on-site and minimise both annual and peak energy demand in accordance with the Mayor of London's Energy Hierarchy below, ~~or in line with any future locally derived methodology:~~
 - i. Be lean: use less energy and manage demand during operation
 - ii. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - iii. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - iv. Be seen: monitor, verify and report on energy performance

All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:

- b. To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site ~~in accordance with the relevant guidance.~~
- c. To achieve the relevant minimum carbon reduction targets as set out in the table below:

Development Type	Minimum on-site total reduction in CO ₂ ³
Major residential development of 10 or more dwellings (including new build, change of use, conversions and major refurbishments)	60%
Minor new build residential development of 1 or more dwellings ⁴	60%
Minor residential change of use and conversions resulting in the creation of 1 or more dwellings	35%
Non-residential development of 500sqm GIA or more (including new build, change of use and major refurbishments)	50%

All new build development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:

- d. To demonstrate compliance with the Mayor’s net-zero carbon target, ~~or any future locally derived target.~~
- e. Where it is clearly demonstrated that the net-zero carbon target cannot be fully achieved on site beyond the minimum requirements, any carbon shortfall to be provided, either:
 - i. through a cash in lieu contribution to Merton’s carbon offset fund, or
 - ii. off-site provided that an alternative proposal is identified, delivery is certain and subject to agreement with the council.

³ This represents a minimum improvement beyond Part L of Building Regulations 2013. When Building Regulations are updated we will seek to apply an equivalent standard against the new Building Regulations.

⁴ Throughout, this refers to gross residential development.

Justification Supporting Text

The Mayor's Energy Hierarchy and Zero Carbon Policy

- 2.2.1 In line with the London Plan, all developments in Merton are required to maximise on-site carbon savings in accordance with the Mayor of London's energy hierarchy through energy efficiency, the use of clean energy, and on-site renewable energy generation.
- 2.2.2 Since 2016, the Mayor has implemented a zero carbon policy for all major residential developments (i.e. of 10 or more dwellings) to drive greenhouse gas and energy savings in London. This policy was extended to include major non-residential developments (i.e. of 1,000sqm GIA or more) in the London Plan in 2021.
- 2.2.3 To date, the Mayor's zero carbon policy has only been applied to major schemes in Merton. However, over 90% of developments in Merton are built as minor schemes (i.e. 10 homes or less, or 1,000sqm non-residential GIA or less), of which a large proportion involves conversions and change of use to create new dwellings⁵. While individually these developments do not represent a large source of carbon emissions, their cumulative impact will significantly affect Merton's ability to achieve our national, regional and local carbon reduction targets. In order to become a net-zero carbon borough by 2050, all development, regardless of its size, will need to reduce its greenhouse gas emissions to near zero on site, and become net-zero carbon or net-positive buildings⁶ [1].
- 2.2.4 In order to drive carbon reductions in Merton's existing and new building stock, all development will therefore be expected to seek new, innovative and robust approaches to reducing energy demand and carbon emissions on site. All applications resulting in the creation of 1 or more new dwellings or 500sqm⁷ or more non-residential GIA (in both new and existing buildings) will need to provide an energy statement to demonstrate how carbon savings have been maximised at all stages of the energy hierarchy and that all reasonable endeavours have been made towards achieving net-zero carbon emissions on site.
- 2.2.5 In addition, all new build development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA will need to demonstrate compliance with the Mayor's net-zero carbon target, ~~or any future locally derived target~~. This means that any carbon shortfall⁸ will need to be offset via renewable energy generation offsite or via cash-in-lieu contributions.

⁵ Around 90% of applications received for non-residential developments are smaller than 1000sqm GIA. The vast majority of residential applications (around 7,000 in the last 5 years) are householder applications (i.e. proposals to alter or enlarge a single house, e.g. extensions). A large proportion of residential applications (over 1,000 in the last 5 years) are minor applications for the creation of new dwellings (including new build, conversions and change of use). A relatively small proportion of residential applications (around 100 in the last 5 years) are major applications.

⁶ A building which generates more energy on-site than it uses on an annual basis.

⁷ Since 2011, Merton has applied the London Plan policies to all non-residential schemes of 500sqm GIA or more given that a significant proportion of non-residential schemes in Merton are less than 1000sqm GIA.

⁸ Using the Part L methodology, ~~or any future locally derived methodology.~~

- 2.2.6 Any development involving the change of use or conversion of an existing building will not be required to offset the carbon shortfall. This is to encourage the refurbishment of existing buildings and disincentivize the demolition of retrofittable buildings, in order to minimise embodied carbon emissions from development. However, all development will be expected to maximise carbon savings on site towards the net-zero carbon target.
- 2.2.7 As set out in strategic policy CC2.1 the Mayor's zero carbon target is not a reflection of true net-zero carbon development because it enables a significant proportion of regulated emissions to be offset via cash-in-lieu contributions and does not take into account unregulated energy uses. To address this gap, we have introduced higher on-site carbon reduction targets to maximise on-site savings as set out below, specified additional requirements to minimise energy demand and unregulated emissions in Policy CC2.3 *minimising energy use*, and set out further requirements to maximise renewable and *low carbon energy* generation in Policy CC2.4.
- 2.2.8 This net-zero carbon target will be reviewed as and when national and regional policy changes (e.g. updates to Building Regulations expected in 202~~2~~3 and 2025 and any updates to the London Plan), and as part of the Local Plan review in 5 years.

Minimum onsite carbon savings

- 2.2.9 The aim of the Mayor's zero carbon policy is to drive carbon savings on site and ensure that any carbon shortfall which cannot be addressed on site is offset elsewhere in the borough to achieve a net-zero carbon balance. However, in practice, the current London Plan 2021 approach (35% minimum target) allows up to 65% of carbon emissions from development to be offset via cash-in-lieu contributions, which shifts the responsibility to the local authority to make the scheme compliant. In order to achieve our carbon reduction commitments, on-site emissions will need to reduce close to zero, so carbon offsetting must not be heavily relied upon and should only be considered where further savings cannot be achieved on site [9] [3].

- 2.2.10 In 2019/2020, a study commissioned by several London boroughs, to investigate the cost of carbon and its role in achieving greater carbon reductions on site, found that the London Plan on-site carbon reduction targets and cost of carbon are inadequate for delivering the savings required to achieve net-zero carbon [12]. The study demonstrated that, using more up to date carbon emissions factors than those used in Building Regulations 2013 (SAP 10 and SAP 10.1)⁹, with an efficient low carbon heating system (e.g. a heat pump) and reasonable levels of fabric and ventilation performance, new build residential and non-residential developments can and should achieve at least a 60% and 50% improvement against Building Regulations 2013 respectively. The decarbonisation of the electricity grid means that, for the same specifications, a greater improvement over Part L is achieved with no extra effort/ cost.
- 2.2.11 In order to drive on-site carbon reduction, we therefore require all major residential development of 10 or more units (including new builds, change of use, conversions and major refurbishments) and all minor new build residential development of 1 or more units to achieve at least a 60% improvement against Building Regulations 2013 on site. All non-residential development of 500sqm or more GIA (including new builds, change of use and major refurbishments) will need to achieve at least a 50% improvement against Building Regulations 2013 on site. All minor change of use and conversions resulting in the creation of 1 or more dwellings will need to achieve at least a 35% improvement against Building Regulations 2013 on site to account for the limitations associated with existing buildings and small-scale development.
- 2.2.12 These minimum onsite targets will be reviewed over time unless there is a local or national change in methodology for assessing building energy performance. We will seek to apply an equivalent standard when Building Regulations are updated.
- 2.2.13 However, all development is expected to get as close to zero-carbon emissions onsite as possible, and will need to demonstrate that on-site savings have been maximised at all stages of the energy hierarchy whether the minimum on-site target has already been met or not. For new build development, offsetting any carbon shortfall via cash-in-lieu contributions or via offsite renewable energy generation will only be considered where the council is satisfied that on-site savings have been maximised.

⁹ The use of outdated carbon emissions factors in Building Regulations means that SAP assessments currently don't reflect the actual carbon emissions associated with the expected operation of a development and significantly overestimate the expected lifetime carbon emissions from electricity use given that they do not reflect the decarbonisation of the electricity grid (Currie & Brown, 2019). This means that savings from the use of certain technologies, such as Combined Heat and Power (CHP) and solar photovoltaic (PV), are currently overestimated, whilst the savings achieved from the use of other technologies, such as heat pumps or mechanical heat ventilation recovery, are underestimated.

Carbon offsetting for new build development and the cost of carbon

2.2.14 In order to genuinely deliver net-zero carbon development, carbon pricing must:

- Drive on-site savings by making it more cost effective for developers to deliver the savings on site than to opt to buy out of their obligation by paying carbon offset contributions; and
- Where offsetting is required, ensure that carbon offset contributions are sufficient for the local authority to pay for measures which achieve carbon savings equivalent to the carbon shortfall of the development. Otherwise developers are not achieving net-zero carbon development and the local authority cannot deliver a net-zero carbon policy [12].

2.2.15 Etude et al. [12] found that the London Plan carbon offset price (£95/t in the London Plan 2021) is too low to actually deliver equivalent carbon savings and therefore does not incentivise sufficient on-site savings. Indeed, the cost of installing additional PV to achieve further improvement on site is currently at around £190/t and this cost is expected to increase to £325/t using the SAP 10.1 carbon factors as a result of the further decarbonisation of grid electricity. This means that, using the cost of carbon recommended in the London Plan, it is cheaper and easier for developers to offset carbon emissions via cash-in-lieu contributions than it is to achieve the actual savings on site, resulting in developments with higher operational emissions.

2.2.16 Etude et al. also found that it would cost a local authority at least £300/t to save carbon in a sustainable way, taking into account administration and management costs [12]. Local authorities therefore have insufficient funds to deliver equivalent carbon savings off site through cash-in-lieu contributions using a cost of carbon of £95/t.

2.2.17 In order to incentivise developers to implement lower carbon strategies on site where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development (e.g. 30 years) will therefore be offset at a rate of £300/t as at 2021. The price for offsetting carbon is regularly reviewed. Any changes to Merton's suggested carbon offset price will be updated in future guidance.

2.2.18 Where a developer is proposing to directly offset any shortfall in carbon dioxide emissions from the proposed development by installing carbon dioxide saving measures off-site (e.g. photovoltaic panels on a local school), this will need to comply with the GLA's Carbon Offset Fund Guidance, and any relevant local guidance. Any offsite proposals will need to be agreed with the council's Climate Change team and confirmed in the energy statement.

- 2.2.19 Etude et al. [12] modelled a number of technical scenarios and demonstrated that several low carbon solutions (involving good practice or ultra-low energy fabric, and a range of low carbon heating systems) achieved the proposed minimum on-site targets across several typologies.
- 2.2.20 These scenarios were modelled using different approaches to carbon offsetting to determine their associated construction and carbon offset costs, which were tested as part of [Merton's Local Plan Housing Viability Study](#) [20].
- 2.2.21 Developers will be expected to adopt the highest possible standards of fabric and ventilation and heating plant to maximise carbon savings on site. Any development that fails to achieve the necessary on-site performance targets or to demonstrate that carbon savings have been maximised, must provide full evidence and justification as to why the scheme is unable to comply. Where the developer contends the policy requirements in relation to viability of a particular proposal, the onus would lie with the developer to demonstrate what can viably be achieved through the submission of a viability assessment. We may seek payments from applications for the cost of independent viability assessment(s).

Policy CC2.3

Minimising Energy Use

Merton Council will require all proposed development within the borough to demonstrate that they have made the fullest contribution to minimising energy use through energy efficiency on site.

This will be achieved by requiring:

All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA

- a. To demonstrate how energy demand, including regulated and unregulated uses, has been minimised on site through passive measures and by maximising the efficiency of building form, fabric and systems.
- b. To disclose the anticipated Energy Use Intensity¹⁰ at design and pre-occupation stage.
- c. To achieve the following minimum on-site carbon savings through energy efficiency alone, as part of achieving the overall savings set out in Policy CC2.2 (c) *minimising greenhouse gas emissions*, in order to reduce energy demand:
 - i. All development resulting in the creation of 1 or more residential units (including new builds, change of use, conversions and major refurbishments) must achieve at least a 10 per cent improvement against Building Regulations 2013 through energy efficiency measures.
 - ii. All non-residential development of 500sqm GIA or more (including new builds, change of use and major refurbishments) must achieve at least a 15 per cent improvement against Building Regulations 2013 through energy efficiency measures.

¹⁰ An annual measure of total energy consumed in a building which can be estimated at design stage and easily monitored in-use as energy bills are based on kWh of energy used by the building. It includes regulated (heating, hot water, cooling, ventilation and lighting) and unregulated (plug loads and equipment) energy.

All new build development resulting in the creation of 1 or more residential unit or 500sqm or more non-residential GIA

d. To demonstrate compliance with the following relevant fabric efficiency targets:

Type of Development	Zero Carbon Hub Interim FEES until 31 December 2022 ¹¹	Zero Carbon Hub Full FEES from 01 January 2023 to 31 December 2024	Space Heating Demand Target from 01 January 2025 ¹²
Blocks of flats and mid-terrace houses	<43 kWh/m ² /yr	<39 kWh/m ² /yr	<15 kWh/m ² /yr
Semi-detached, end of terrace and detached houses	<52 kWh/m ² /yr	<46 kWh/m ² /yr	<20 kWh/m ² /yr
Non-residential development	-	-	<15 kWh/m ² /yr

e. From 01 January 2025, to meet the following maximum Energy Use Intensity targets ~~as set out in the relevant guidance~~:

- i. Residential – 35 kWh/m²/yr
- ii. Offices – 55 kWh/m²/yr
- iii. Schools – 65 kWh/m²/yr
- iv. Multi-residential (e.g. student accommodation) – 35 kWh/m²/yr
- v. Retail – 55 kWh/m²/yr
- vi. Leisure – 100 kWh/m²/yr
- vii. Higher education teaching facilities – 55 kWh/m²/yr
- viii. Light industrial uses – 110 kWh/m²/yr
- ix. GP surgery – 55 kWh/m²/yr
- x. Hotel – 55 kWh/m²/yr

All major development

f. To monitor and report on energy use for 5 years post-occupancy¹³.

¹¹ Based on the Fabric Energy Efficiency Standard for Zero Carbon Homes as defined by the Zero Carbon Hub (2009) [40].

¹² Based on recommendations from the Committee on Climate Change (2019) [11] and the London Energy Transformation Initiative (2020) [9].

¹³ In line with the GLA’s ‘Be Seen’ Energy Monitoring Guidance, or equivalent.

Justification Supporting Text

- 2.3.1 A building's operational carbon emissions are a direct result of its energy use. In order to reduce greenhouse gas emissions and ultimately achieve our carbon reduction targets, a development will therefore first and foremost need to minimise energy use through energy efficiency, as reflected in the first tier of the Mayor's Energy Hierarchy: 'Be Lean'.
- 2.3.2 In addition, the transition to low carbon heat, which is required to deliver long term carbon savings, is contingent on having high levels of energy efficiency [21].
- 2.3.3 Energy efficiency will depend on both building and equipment design. This policy focusses primarily on fabric efficiency, and Policy CC2.4 *low carbon energy* below addresses the importance of efficiency of plant in decarbonising heat.

The role of energy efficiency in delivering low carbon heat

- 2.3.4 In order to manage running costs and avoid external costs to the grid infrastructure, a transition to low carbon heat can only be achieved through significant improvements to energy efficiency [10]. Indeed, low carbon heating solutions (such as heat pumps and solar thermal) tend to operate most effectively at low temperatures, and are therefore much more sensitive to energy efficiency than conventional gas boiler systems [9]. Indeed, if a building's heat losses are much higher than anticipated, a low temperature heating system has to run at higher operating temperatures to compensate for this, which can result in significant increases in energy use and energy bills [10]. In addition, as we move from gas to electricity to heat our buildings, energy use needs to be minimised to reduce the demand for energy generation and peak loads on the national grid [9] [22].
- 2.3.5 Merton Council therefore requires compliance with minimum on-site carbon reduction targets through energy efficiency alone in line with the London Plan. Developers will need to demonstrate a 10% and 15% improvement for all residential development resulting in the creation of 1 or more units and non-residential development of 500sqm GIA respectively (including new builds, change of use, conversions and major refurbishments).

2.3.6 However, there are limitations to using Building Regulations as a tool for driving energy efficiency. Indeed, the Part L methodology enables low carbon energy to compensate for poor building fabric and doesn't reflect efforts to improve energy efficiency through form [14]. Part L assessments also underestimate carbon savings achieved through improvements to fabric and ventilation, given that they underestimate a development's space heating requirements [12].

The need for fabric energy efficiency standards

2.3.7 Improved fabric energy efficiency will ensure that buildings use low and zero carbon energy in the most efficient way [11]. As well as reducing greenhouse gas emissions, using ultra-high levels of fabric efficiency alongside heat pumps and Mechanical Ventilation and Heat Recovery (MVHR) systems can help reduce annual and peak electricity demand, provide comfort and health benefits to occupants, and deliver average bill savings of around £85 per year for a typical three bedroom semi-detached house [11], [which will help tackle fuel poverty in Merton](#). This will also help 'future proof' developments and reduce the likelihood of buildings needing difficult and expensive refurbishment at a later date.

2.3.8 In 2019, the Committee on Climate Change recommended to the UK government that new homes should deliver ultra-high levels of energy efficiency achieving a space heating demand of 15kWh/m²/yr or less as soon as possible and by 2025 at the latest [11]. In 2020, the London Energy Transformation Initiative published their Climate Emergency Design Guide which concluded that in order to achieve our national carbon reduction targets, all new residential and non-residential buildings should be designed to achieve a space heating demand of 15kWh/m²/yr or less by 2025 [9].

2.3.9 In order to give industry the opportunity to adjust, Policy CC2.3 *minimising energy use*, part (d) sets out a gradual increase in fabric energy efficiency standards for residential developments. To do this, Merton Council will require all new build residential developments to comply with the minimum Fabric Energy Efficiency Standard (FEES) for Zero Carbon Homes defined by the Zero Carbon Hub in 2009.

2.3.10 The FEES, measured in kWh/m²/yr and available through the Government's Standard Assessment Procedure (SAP), covers space heating and space cooling energy demand. The FEES allows design flexibility, takes into account building form, promotes innovation and delivers a specific level of dwelling performance. The FEES is much better at recognising efforts made to improve energy efficiency through building form and fabric specifications than a percentage improvement against Building Regulations, as demonstrated by Etude in 2017 [14].

- 2.3.11 The Zero Carbon Hub recommended two different performance levels for (a) blocks of flats and mid terrace houses, and (b) semi-detached, end of terrace and detached houses. This is because certain dwelling types with less exposed fabric relative to floor areas, such as mid-floor apartments, can achieve a lower energy space heating and cooling demand with a less challenging construction specification than other dwelling types.
- 2.3.12 To encourage a gradual shift in fabric efficiency, the Zero Carbon Hub defined an 'Interim FEES' for implementation from 2013 and a 'Full FEES' for implementation from 2016. These standards were never introduced through Building Regulations as a result of the national Zero Carbon Homes policy being scrapped. However, in 2017, Etude demonstrated that both the interim and full FEES were technically feasible and viable with a range of combinations of form and fabric specification [14] and these standards are already being achieved by a number of schemes in Merton.
- 2.3.13 Merton Council will therefore require all new residential development to achieve at least the 'interim' FEES until the end of 2022 and at least the 'full' FEES from the start of 2023. In line with the recommendations from LETI and the CCC, Merton Council will also require all new build residential and non-residential development to achieve a space heating demand of 15kWh/m²/yr or less by 2025.

[New Paragraph - In the past 5 years, non-residential development in Merton has included everything from a football stadium, to a hotel development, to a mixed-use development comprising a community gym/ retail space, hostel and residential development. Given the range of non-residential developments that could come forward in Merton over the lifetime of this Local Plan, the council will work with applicants towards achieving this target on a case by case basis for any bespoke non-residential development.](#)

Closing the gap between predicted and actual energy demand

- 2.3.14 It is widely accepted that there is a significant performance gap between the energy use and carbon emissions estimated at design stage and the actual in-use performance of buildings using the current Building Regulations Part L methodology, and that this needs to be addressed in order to genuinely make our buildings net-zero carbon [9] [11] [23]. The Part L methodology uses carbon emissions as the main performance metric which is dependent on the carbon factor of the electricity grid and does not necessarily reflect good operational performance. The UK Passivhaus Trust found that new build houses have an average performance gap of 40% between the actual overall energy use compared to the EPC modelling carried out at design stage [22] which means that buildings are emitting significantly more carbon than predicted using the SAP methodology.

2.3.15 Managing the performance gap and ensuring good design is particularly important with the roll-out of low carbon heating systems which are much more sensitive to building heat losses and system inefficiencies than traditional gas heating systems [10].

2.3.16 In addition, current Building Regulations (2013) do not address unregulated emissions associated with cooking, white goods and other equipment which can represent up to 50% of a building's operational emissions [9]. Operational performance of buildings therefore cannot be verified using the Part L methodology. The CCC has highlighted the importance of improving building performance monitoring and focussing on 'as built' performance in order to close this performance gap which could deliver £70-260 in annual bill savings per household [11].

A new metric for measuring performance: Energy Use Intensity

2.3.17 LETI's Climate Emergency Design Guide [and the UK Green Building Council's Net Zero Whole Life Carbon Roadmap](#), which sets out a roadmap to net-zero carbon, [both recommends](#) the use of Energy Use Intensity (EUI) targets in regulations, policy and design decisions to drive energy efficiency [9] [24]. EUI is an annual measure of total energy consumed in a building which can be estimated at design stage and easily monitored in-use as energy bills are based on kWh of energy used by the building. It includes regulated (heating, hot water, cooling, ventilation and lighting) and unregulated (plug loads and equipment) energy [9].

2.3.18 In order to improve our understanding of energy demand and drive more energy efficient design of buildings, Merton Council requires all developments resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA to determine their anticipated EUI, at planning and pre-occupation stage. Major schemes will need to calculate the anticipated regulated and unregulated energy demand, and combined EUI, using the Chartered Institute of Building Service Engineers (CIBSE) TM54 methodology, Passive House Planning Package (PHPP) methodology or equivalent, or successor methodologies¹⁴. Minor residential schemes resulting in the creation of one or more dwellings will need to estimate the expected regulated and unregulated energy demand, and combined EUI, using the Part L methodology or equivalent, or successor methodologies.

2.3.19 In addition, all major developments are required to monitor and report actual operational energy performance for at least five years post-occupancy in line with policy SI 2 in the London Plan 2021 and the GLA's 'Be Seen' Energy Monitoring Guidance 2020, or equivalent.

¹⁴ These methodologies enable more accurate determination of the anticipated energy demand and carbon emissions by considering factors which impact on a building's energy performance including expected occupancy and use, and calculate unregulated loads [41]. These methodologies can also be used to verify the performance of the constructed building in operation, which is not possible with Building Regulation Part L percentage reductions.

2.3.20 In 2019, Currie and Brown also recommended that absolute performance targets are used to reduce energy demand (peak demand in particular) in order to reward energy efficient designs and minimise running costs and pressures on the national grid [10].

2.3.21 In their Climate Emergency Design Guide, LETI ~~have~~ identified energy consumption targets for four building typologies consistent with achieving national net-zero carbon targets; LETI concluded that all new build development should be designed to achieve these standards by 2025 [9]:

- **Small scale residential** – reducing EUI to 35 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.
- **Medium and large scale residential** – reducing EUI to 35 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.
- **Commercial offices** – reducing EUI to 55 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.
- **Schools** - reducing EUI to 65 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.

~~2.3.22 Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to future-proof their development and lead the way in decarbonising Merton until EUI targets are required through national regulations or a locally derived methodology. Merton Council will enforce EUI targets from 2025; these targets will be confirmed in relevant guidance closer to the time in order to consider the latest evidence and technologies. In 2021, Etude carried out a feasibility study [25] to inform the Net Zero Carbon Evidence Base for the Greater Cambridge Local Plan [26] which identified the following Energy Use Intensity targets for a range of development types:~~

- Residential – 35 kWh/m²/yr
- Offices – 55 kWh/m²/yr
- Schools – 65 kWh/m²/yr
- Multi-residential (e.g. student accommodation) – 35 kWh/m²/yr
- Retail – 55 kWh/m²/yr
- Leisure – 100 kWh/m²/yr
- Higher education teaching facilities – 55 kWh/m²/yr
- Light industrial uses – 110 kWh/m²/yr
- GP surgery – 55 kWh/m²/yr

- Hotel – 55 kWh/m²/yr

New Paragraph - Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to reduce fuel bills for future occupants and help tackle fuel poverty in Merton, and to future-proof their development and lead the way in decarbonising Merton. These targets, or subsequently adopted targets, will be enforced from January 2025.

2.3.23 Developments are also encouraged to adopt recognised and successful fabric first approaches such as Passivhaus which is seen as the most stringent low 'energy in use' standard and is consistent with LETI's Climate Emergency Design Guide. This standard also relies on a more accurate energy demand assessment methodology using the Passive House Planning Package (PHPP).

Policy CC2.4

Low Carbon Energy

All proposed developments within the borough must demonstrate that they have made the fullest contribution to supplying energy efficiently and cleanly, and maximising renewable and low carbon energy generation, storage and use, through the deployment of appropriately selected, sized and sited technologies.

This will be achieved by requiring:

- a. All new development to use low carbon heat. There can be no gas boilers in new dwellings or new non-~~domestic~~residential development in Merton from January 2023.
- b. All development proposals to demonstrate in the energy statement:
 - i. How the proposal has made the best potential use of roof space to maximise local renewable and low carbon electricity and/or heat generation – 100% of energy demand should be met by renewable energy generation on site wherever possible;
 - ii. How appropriate roof spaces have been utilised to maximise the delivery of multi-functional benefits (e.g. co-location of renewable energy and green, brown or blue infrastructure);
 - iii. How demand-side response has been incorporated, specifically through the installation of smart meters, minimising peak energy demand and promoting short term energy storage;
 - iv. How the proposal has ensured efficient generation of low carbon energy on site; any developments proposing to use heat pumps to demonstrate that these are good quality and achieve a minimum standard of efficiency; and
 - v. How all major development proposals located within identified heat network opportunity areas have utilised decentralised energy, or are enabled for connection to current or future district heat networks, unless it is demonstrated that it is not technically feasible to do so.

Justification Supporting Text

2.4.1 In order to have net-zero carbon emissions, once energy demand has been minimised, the remaining energy we use to power and heat our buildings will need to be generated from clean, low carbon and renewable sources [9].

The decarbonisation of heat

2.4.2 Low carbon heat is an essential component of our roadmap to net-zero carbon given that heat accounts for a third of the UK's greenhouse gas emissions [11] [21]. BEIS' Clean Growth Strategy emphasized that a fundamental shift away from fossil fuels for heating is required, alongside reductions in energy demand through energy efficiency [27]. In 2015, the Energy Technologies Institute estimated that 20,000 households per week would need to be switched from gas to low carbon heating between 2020 and 2050 in order to bring emissions from the UK's existing housing stock to near zero carbon [28].

2.4.3 98% of homes in Merton use gas as their primary source of heating. All buildings in Merton must be gas free by 2050 in order to achieve our carbon reduction target, unless the Government plan to supply a low carbon gas through the gas grid [1]. There is increasing interest in the use of hydrogen and biomethane as low carbon alternatives to gas [27], but insufficient evidence is currently available to demonstrate that either of these are credible options for wide-scale decarbonisation of heat in the short term [29] [30] [12] [31]¹⁵.

2.4.4 Low carbon heating generally requires different space heating design standards to gas heating as the former tends to operate most effectively using a low temperature system whereas the latter operates at high temperatures [10]. A building typically has a lifespan longer than 30 years, so any new building which is designed and built to use a high temperature heating system will require retrofit to move to a low carbon system before 2050.

¹⁵ There currently remains significant uncertainty around the cost and practicality of repurposing the gas grid to deliver hydrogen from low carbon sources, particularly in terms of consumer acceptability and the cost of safely distributing hydrogen to end-users [46] [45]. Biomethane could be used to reduce carbon emissions from the gas grid, but no studies have suggested that this could fully replace the role of natural gas at its current levels of use due to the relatively small available resource and its potential value elsewhere in the energy system [21, 28].

- 2.4.5 In their 2019 study [10] on the costs and benefits of tighter energy efficiency standards, Currie & Brown demonstrated that delayed action in decarbonising heat would have a significant carbon impact: each year of delay in adopting lower-carbon heat technologies could result in several million tonnes of avoidable carbon emissions. They found that a home built to use gas heating in 2020 which is retrofitted to use a heat pump in 2030 can be expected to emit over three times more carbon over 60 years than if the heat pump was installed from the start, as the house would have originally been built to different space heating design standards.
- 2.4.6 The costs of installing low carbon heat as a retrofit are also between three and ten times higher than delivering them in a new building [10]. The Clean Growth Strategy highlighted the importance of ensuring that all new homes can accommodate low carbon heating in order to avoid the need for expensive retrofit further down the line. In their 'UK Housing: Fit for the Future?' report (2019), the CCC concluded that no new homes should be connected to the gas grid from 2025 at the latest, with ultra-low energy homes using low carbon heat instead [11].
- 2.4.7 In order to drive the decarbonisation of heat in Merton and minimise the retrofit burden, Merton Council requires all new development to use low carbon heat efficiently. Any development that proposes to use gas-powered systems will need to provide robust justification to satisfy Merton Council that low or zero carbon systems cannot be used, to set out how the development has been future-proofed to achieve net-zero carbon by 2050, and to demonstrate that the gas-powered system is credibly being used as a stepping stone towards this objective. No gas boilers can be installed in new dwellings or new non-~~domestic~~residential development from January 2023.

The electrification of heat

- 2.4.8 The electrification of heat will likely play a major role in decarbonising heat. As well as becoming a lower carbon energy source with the decarbonisation of the national grid, electricity also provides air quality benefits which are particularly important in a London-borough [12]. There are a range of technologies that can convert electricity into heat including heat pumps and direct electric heating systems.
- 2.4.9 Proposals using direct electric heat will only be deemed acceptable if the developer can demonstrate, through Passivhaus certification or equivalent, that energy use has been significantly reduced by achieving ultra-high fabric efficiency [12]. This is to ensure that direct electric heating systems do not result in high energy bills for future residents, and to mitigate the risk of fuel poverty.

- 2.4.10 Heat pumps¹⁶ are likely to play a growing role in the delivery of low carbon heat in London, as part of both low carbon heat networks and individual building heating systems [29]. Well designed, installed and maintained heat pumps can be very energy efficient and a way of harnessing waste heat. Heat pumps typically achieve efficiencies between 260 and 320% [29], whereas direct electric systems and gas boilers typically operate between 80 and 100% efficiency [21]. In addition, heat pumps use low flow temperature and large emitters to spread heating throughout the day, resulting in reduced peak heating demand compared to gas boilers and direct electric systems which operate when heat is desired [21]. Heat pumps also have the benefit of being smart grid ready which could enable demand-side response.
- 2.4.11 Heat pumps are already a lower carbon system than gas boilers, and the carbon factor for grid electricity is expected to decrease further as more renewable energy is produced, while the carbon content of gas is likely to remain the same unless low carbon gasses are introduced to the gas grid [12]. Heat pumps also provide air quality benefits given that they do not produce any direct emissions on site.
- 2.4.12 Low-carbon heat using a heat pump is cost effective when built into new homes from 2021 and should not increase running costs if the system is well designed, installed and operated, particularly in well-insulated buildings [10]. Heat pump deployment in new build properties will also play an important role in helping develop the heat pump markets and supply chains required to electrify heat in our existing building stock [30].
- 2.4.13 However, inappropriate design, installation or operation of heat pumps can result in high energy costs and increased peak electricity demand. In order to mitigate impacts on the electricity grid and operating costs, electrical heating systems must be highly efficient and paired with high fabric efficiency [9] [29]; high performance building fabric is critical to enable the electrification of heat while keeping costs low for future residents. All new development should also be designed to harness heat at low temperatures given that heat pumps tend to operate significantly more efficiently at lower temperatures and waste heat sources are also typically at lower temperatures [9].

¹⁶ A heat pump uses electricity to increase the temperature of a low temperature heat source (e.g. air, water or ground).

2.4.14 Where heat pumps are proposed, developments will need to demonstrate that efficiencies have been maximised through the proposed technology and heating system. A high specification of energy efficiency (coefficient of performance) will be expected to ensure the system works efficiently and reduces running costs and peak electricity demand. UKPN has indicated that they will actively plan for additional demand due to heat pumps, provided they have early visibility of any deployment plans, and are notified of installations on their networks [29].

Decentralised energy

2.4.15 The use of decentralised energy and local secondary heat sources is expected to play a significant part in reducing emissions from buildings in London [32]. All major development proposals will be expected to comply with London Plan policies on decentralised energy networks and decentralised energy.

2.4.16 The council will require all proposed major development and regeneration schemes within any identified heat network opportunity areas to fully explore and utilise decentralised energy, subject to technical and financial viability. Heat-mapping and feasibility studies undertaken by AECOM in 2017 [33]/2018 [34] identified two district heat network opportunity areas in Merton linked to two major regeneration schemes: Morden town centre and South Wimbledon (High Path estate).

2.4.17 Any proposals to develop or connect to a site-wide or district heat network will need to demonstrate compliance with all Merton's climate change policies, be future-proofed and demonstrate that heat losses have been minimised. Given that the carbon savings from gas engine combined heat and power (CHP) systems are declining due to the decarbonisation of the national electricity grid, and increasing evidence of adverse air quality impacts, developers will be required to use low and zero carbon heat sources and existing heat networks will need to be decarbonised [32].

Renewable energy generation

2.4.18 The use of renewable and low-carbon micro-generation technologies (e.g. solar photovoltaic panels, solar thermal and air source heat pumps) is now a viable, cost-effective and practical approach to ensuring developments can achieve their on-site carbon emissions requirements alongside low carbon heat and high energy efficiency, and will play a crucial role in achieving our net-zero carbon target [27] [12] [9].

- 2.4.19 In order to genuinely operate at net-zero operational carbon, all buildings must be 100% powered by renewables [9]. As renewable energy generation increases in the UK, grid electricity will continue to decarbonise [8]. However, electricity demand is expected to increase across London as a result of population growth, the electrification of heat and increased uptake of electric vehicles [32]. In order to limit pressure on the national electricity grid, contribute to the decarbonisation of grid electricity (if development feeds back to the grid), and ultimately build a more resilient local energy supply, the council requires all development to demonstrate that on-site renewable energy generation has been maximised and that 100% of energy demand is met through on-site renewable energy generation wherever possible. Developers will need to compare their anticipated Energy Use Intensity (EUI)¹⁷ to the amount of renewable energy expected to be generated on-site annually, and these will be expected to match where feasible.
- 2.4.20 Developments in conservation areas or involving heritage assets need to provide careful consideration of how sustainable energy measures may be incorporated without adversely impacting on the character, function and preservation of a specific area or asset, in accordance with the policies on design in this Local Plan. In such circumstances, development proposals should not presume that a viable sustainable solution cannot be provided. Where necessary, Merton will determine whether the provision of sustainability measures causes any adverse impact with the asset or area, and will prioritise safeguarding of the asset, as appropriate.

¹⁷ See Policy CC2.3 *minimising energy use* for more details.

Demand-side response and energy storage

- 2.4.21 Demand-side response involves changing how and when electricity is used to minimise peak energy demand. Demand-side response will play an important role in embedding flexibility in our energy systems, improving the utilisation of intermittent low carbon energy generation, and ensuring that energy supply always meets demand whilst reducing pressure on the national grid [35].
- 2.4.22 Energy storage (heat and battery storage) and flexibility will need to be maximised to reduce energy use and pressure on the national grid at peak times, and ensure that variable renewable energy supply can match electricity demand at all times [11] [36] [9]. Advancements in energy storage technology have meant that energy storage is now feasible at individual domestic level, and costs are predicted to continue to fall [10].
- 2.4.23 The council therefore requires all development to demonstrate that demand-side response has been considered and maximised alongside renewable energy generation.

Policy CC2.5

Minimising Waste and Promoting a Circular Economy

Merton Council will require all development proposals to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.

This will be achieved by requiring:

All development:

- a. To prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.
- b. To be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the 'in-use' and 'end of life' phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.
- c. To ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime.
- d. To minimise the environmental impact of materials by specifying sustainably-sourced, low impact and re-used or recycled materials; this should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally-sourced wherever possible to minimise transport emissions.

All development resulting in the creation of 30 or more dwellings or 1000sqm or more non-residential GIA, and all development proposing to demolish and rebuild a single dwelling:

- e. To undertake a Whole Life-Cycle Carbon assessment proportionate to the scale of development and demonstrate that whole life-cycle carbon savings have been maximised.

Justification Supporting Text

Embodied carbon and a circular economy

- 2.5.1 The construction of a development uses energy and resources which represent its embodied carbon emissions. Of the annual carbon emissions associated with the UK building stock (existing and new build) 20% is related to the embodied emissions associated with new construction [9]. Climate change policies relating to sustainable design have traditionally focused on reducing operational carbon emissions. However, as buildings become more energy efficient and energy generation is decarbonised, the proportion of operational emissions will significantly reduce and embodied carbon will represent a higher proportion of whole life-cycle carbon emissions. Embodied carbon can represent 40-70% of whole life-cycle carbon emissions in a new low carbon building [9].
- 2.5.2 A circular economy is one that seeks to promote waste minimisation by moving from a more traditional linear model of resource use, consumption and disposal, to one that promotes long-term sustained use, reuse and recycling. Merton is supportive of the move towards a more circular economy. As such, circular economy principles should be embedded across all facets of the development lifecycle - from concept and design to build-out and occupation/ use, in order to increase resource efficiency, minimise operational and embodied carbon emissions, and minimise residual waste, in line with Section R2 of the National Design Codes 'Careful selection of materials and construction techniques' [37].
- 2.5.3 Circular economy opportunities might include using materials with a lower embodied carbon (e.g. timber rather than concrete frame – using timber also provides an opportunity to sequester carbon), using more recycled content in the materials and finding other ways to enhance recovery and recyclability (e.g. reinforcement free concrete). Mechanical and electrical services will typically need to be replaced every 20 years and should therefore be designed to allow easy recovery, reconditioning and reuse whilst also optimising for performance and carbon emissions. Encouraging a 'fabric first' approach to building design can also minimise mechanical plant and services in favour of natural ventilation.
- 2.5.4 In 2020, LETI identified the following best practice upfront embodied carbon targets for buildings designed in 2020 and 2030 [9]:
- Residential
 - Best practice 2020 <500kgCO₂/m²

- Best practice 2030 <300kgCO₂/m²

- Non-residential

- Best practice 2020 <600kgCO₂/m²
- Best practice 2030 <350kgCO₂/m²

2.5.5 The GLA's Whole Life-Cycle Carbon Assessments guidance also provides benchmarks and aspirational benchmarks for different development types.

2.5.6 Embodied carbon benchmarks and targets are a developing knowledge area and are expected to be refined over the coming years. LETI has been consulting with industry groups including RIBA, CIBSE, IStructE, the GLA and the Whole Life Carbon Network to align definitions, scopes, measurement methodologies and targets [38].

2.5.7 All new build development will be expected to endeavour to minimise embodied carbon in line with best practice targets contained within the latest industry guidance.

[New Paragraph - All applications that are referable to the Mayor of London will need to submit Circular Economy Statements that have been prepared in accordance with the GLA's Circular Economy Statement Guidance¹⁸.](#)

Whole life-cycle carbon emissions

2.5.8 A whole life-cycle carbon approach which captures a building's operational (regulated and unregulated) and embodied emissions, as well as emissions associated with the maintenance and disassembly and disposal of the development, is required to fully understand the carbon impact of a development. Minimising whole life-cycle carbon emissions through careful and considered use of natural and renewable resources, promoting sustainable construction and minimising energy use are key considerations in securing a sustainable, low carbon future for Merton.

2.5.9 The Mayor requires all referable schemes to undertake a Whole Life-Cycle Carbon Assessment in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance 2020, or equivalent. All major schemes are also encouraged to undertake whole-life cycle carbon assessments under the London Plan. In order to drive a reduction in whole life-cycle carbon emissions in Merton's building stock and to develop a better understanding of whole life-cycle carbon emissions associated with development in the borough, Merton Council will require all schemes resulting in the creation of 30 or more dwellings or 1000sqm or more non-residential GIA to undertake a Whole Life-Cycle Carbon Assessment.

- 2.5.10 Historically, Merton has received a large number of applications for the substantial or total demolition of a single dwelling house and rebuild as a single dwelling. Such proposals are typically driven by design, intensification or lifestyle rather than on the grounds of structural instability.
- 2.5.11 All such proposals outside of structural instability are considered a highly inefficient use of resources and materials and contrary to the principles of sustainable development and the circular economy. Even where proposals are deemed to result in an improvement of 'in use' energy consumption, the embodied carbon footprint of whole scale demolition and rebuild means that any environmental benefits are unlikely to be realised in the long term.
- 2.5.12 The council therefore requires all proposals to demolish and rebuild a single dwelling to submit a Whole Life-cycle Carbon Assessment proportionate to the scale of development. Developers will be required to demonstrate that the development has been designed and delivered in accordance with the principles of a circular economy to minimise embodied carbon.
- 2.5.13 This policy will also apply in cases where a substantial amount, but not all, of the original building is demolished and rebuilt (for example, where the original façade is required to be retained).

¹⁸ [Mayor of London \(2020\) Circular Economy Statement Guidance – Draft for Consultation \(Available at: https://www.london.gov.uk/publications/circular-economy-statement-guidance\).](https://www.london.gov.uk/publications/circular-economy-statement-guidance)

Policy CC2.6

Sustainable Design Standards

Merton Council will seek high standards of sustainable design and construction from new development, change of use, conversions and refurbishments to ensure that all development makes effective use of resources and materials, minimises water use, and assists in meeting local and national carbon reduction targets.

This will be achieved by:

- a. Requiring all development to demonstrate that the use of mains water has been minimised by incorporating measures such as smart metering, water saving and recycling measures, including retrofitting where appropriate.
- b. Requiring all major developments and high water use developments to include water saving measures such as rainwater harvesting and greywater recycling to reduce mains water consumption.

Residential development:

- c. Requiring all residential development to meet a minimum internal water efficiency standard of 105 litres per person per day, as set out in Building Regulations Part G or equivalent.
- d. Requiring all conversions and changes to the use of existing buildings resulting in the creation of 10 or more new dwelling(s) to achieve a minimum BREEAM Domestic Refurbishment rating of 'Excellent' or equivalent.

Non-residential development:

- e. Requiring all new build non-residential development of 1,000sqm GIA and above to achieve a minimum of BREEAM Non-domestic New Construction 'Excellent' standard or equivalent.
- f. Requiring all conversions and changes of use to non-residential uses of 1,000sqm GIA and above to achieve a minimum of BREEAM Non-domestic Refurbishment and Fit-out 'Excellent' standard or equivalent.

Justification Supporting Text

BREEAM

- 2.6.1 The principles of sustainable design and construction are designed to be holistic and are more wide-ranging than energy performance alone. National sustainable design and construction standards such as BREEAM ensure that a development's full impact on the environment, including water use, transport and land use and ecology, as well as energy use and waste are considered and addressed. Using these standards or any subsequently adopted set of national sustainable construction standards, will assist in the delivery of a number of the policies covered in the Local Plan including the Transport, Green Infrastructure and Climate Change policies.
- 2.6.2 The highest standards of sustainable design and construction should be applied to improve the environmental performance of new development. Development proposals must demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- 2.6.3 The BREEAM Domestic Refurbishment standard provides a recognised scheme and methodology by which conversions and change of use can demonstrate their adherence to sustainable design and construction methodologies. Merton Council therefore requires all major schemes resulting in the creation of 10 or more new dwellings through the conversion or change of use of existing buildings to achieve a minimum BREEAM Domestic Refurbishment rating of 'Excellent' or equivalent. In particular, this scheme will help drive energy efficiency improvements across Merton's existing building stock through its post-refurbishment Energy Efficiency Rating requirements.
- 2.6.4 Merton Council also requires all major development of 1,000sqm or more non-residential GIA (both new and existing buildings) to achieve BREEAM 'Excellent' standard or equivalent.
- 2.6.5 Proportionally, Merton receives a large number of minor development applications which involve the conversion and change of use of existing buildings to create new dwellings. In order to make our housing fit for the future, existing homes must be made low-carbon, low-energy and resilient to a changing climate [11] through the uptake of measures including:
- Improved insulation in lofts, walls and floors;

- Double or triple glazing windows;
- Low-carbon heating;
- Draught proofing;
- Highly energy efficient appliances;
- Highly water efficient devices;
- Passive cooling measures such as shading and ventilation;
- Green space to reduce the risks of flooding and overheating;
- Improved flood resilience and resistance.

Minimising water use

2.6.6 According to Waterwise, the UK has less available water per person than most other European countries [39]. London is drier than Istanbul, and the south-east of England has less water available per person than the Sudan and Syria. London has lower rainfall than the national average while having an extremely high population density [40].

2.6.7 This combination of limited water resources and high demand has resulted in the Environment Agency designating the Thames Water region to be “seriously water stressed” [41]. This trend is very likely to be exacerbated by future changes in climate and population growth [42].

2.6.8 All development must therefore be designed to be water efficient and reduce water consumption. Merton Council requires all development to demonstrate that the use of mains water has been minimised by incorporating measures such as smart metering, water saving and recycling measures, and retrofitting water efficiency measures where appropriate, to help achieve lower water consumption rates and to maximise future-proofing.

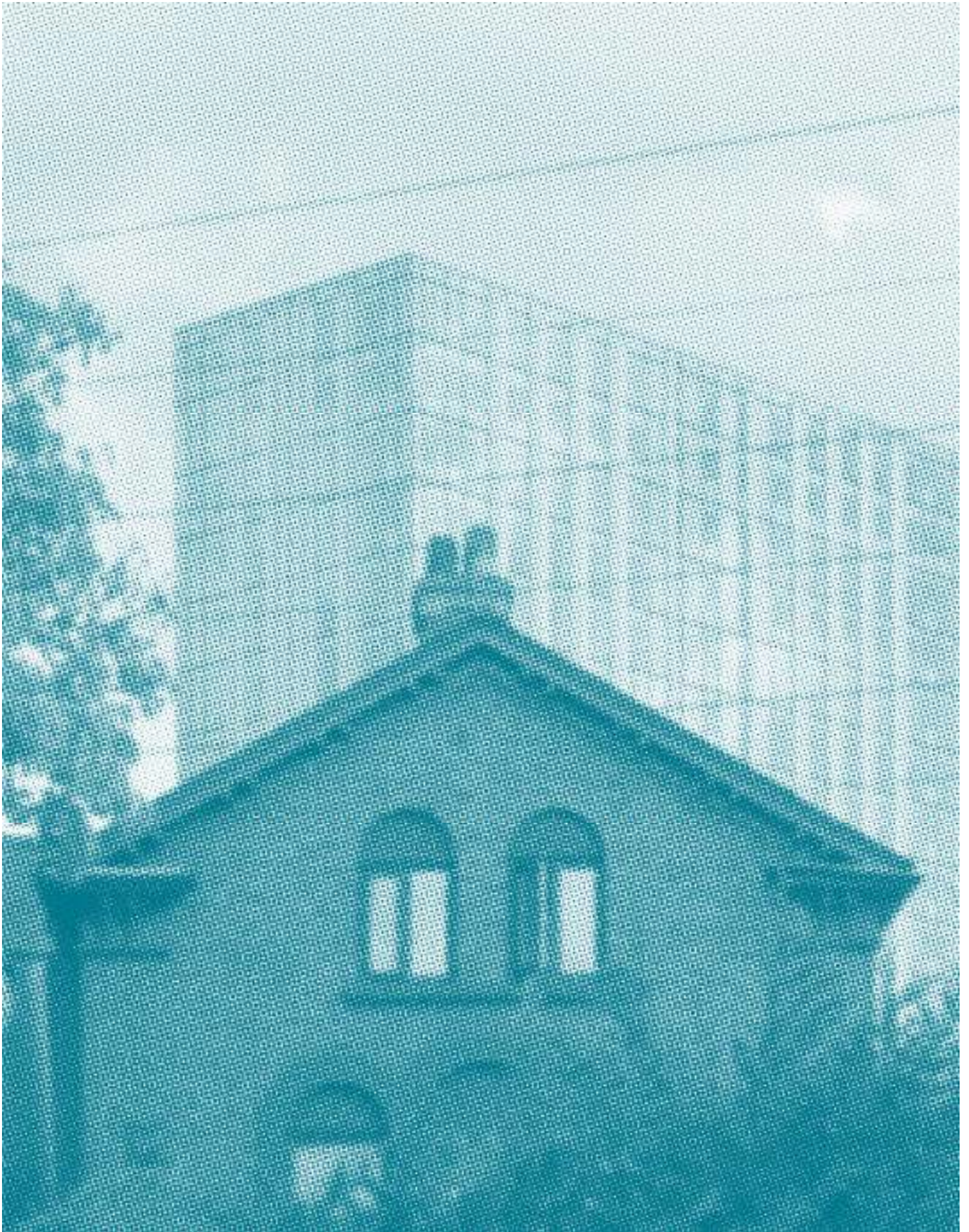
- 2.6.9 All residential schemes will be required to demonstrate that internal water usage rates of less than 105 litres per person per day have been achieved. All non-residential development of 1,000sqm GIA and above will be expected to achieve at least the BREEAM Excellent water-efficiency credits.
- 2.6.10 All major developments and high water use developments, such as hotels, hostels and student housing, will be expected to include water saving measures such as rainwater harvesting and greywater recycling to achieve lower water consumption rates.
- 2.6.11 New development, conversions and change of use of all sizes should seek new, innovative and more robust approaches to achieving a high standard of sustainable design and construction.

References

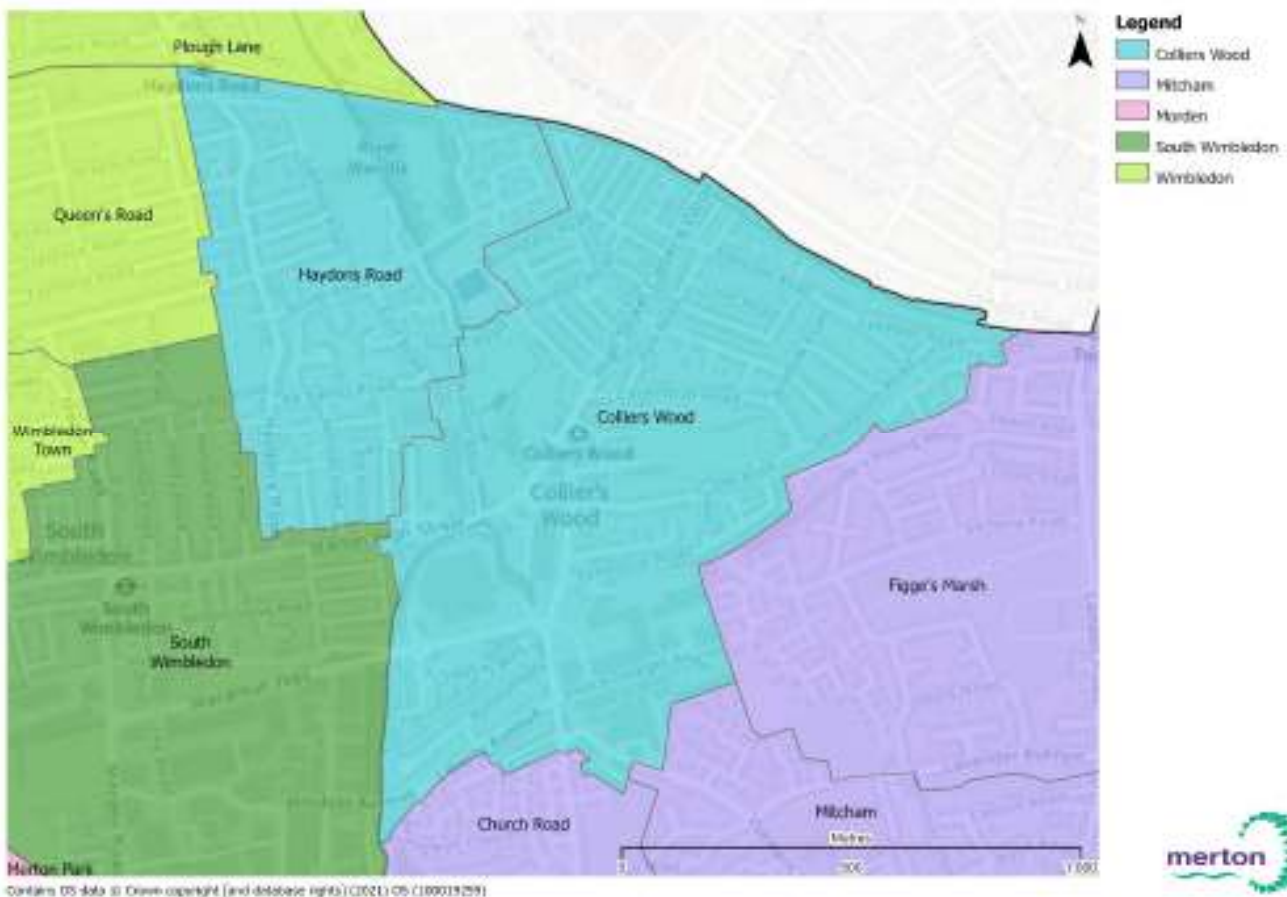
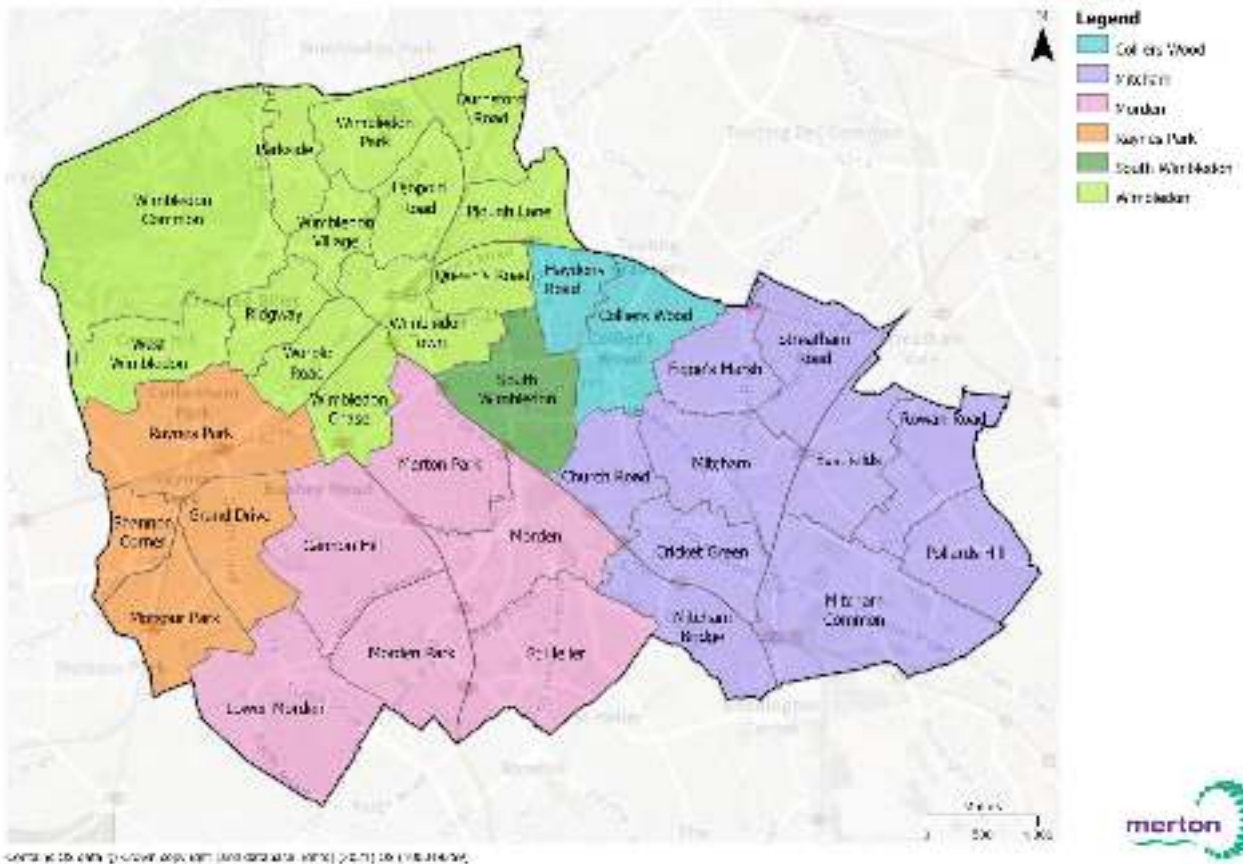
- [1] Merton Council, "Climate Strategy & Action Plan," 2020. [Online]. Available: <https://www.merton.gov.uk/planning-and-buildings/sustainability-and-climate-change/climate-emergency>.
- [2] Intergovernmental Panel on Climate Change, "Special Report on Global Warming of 1.5C," 2018. [Online]. Available: <https://www.ipcc.ch/sr15/>.
- [3] Committee on Climate Change, "Net Zero – The UK's contribution to stopping global warming," 2019. [Online]. Available: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>.
- [4] "The Climate Change Act 2008 (2050 Target Amendment) Order 2019," 2019. [Online]. Available: <https://www.legislation.gov.uk/uksi/2019/1056/contents/made>.
- [5] Mayor of London, "1.5C Compatible Climate Action Plan," 2018. [Online]. Available: <https://www.london.gov.uk/what-we-do/environment/climate-change/climate-action-plan>.
- [6] Mayor of London, "Environment Strategy," 2018. [Online]. Available: <https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>.
- [7] Merton Council, "Merton Council declares a Climate Change Emergency," 2019. [Online]. Available: <https://news.merton.gov.uk/2019/07/10/merton-council-declares-a-climate-change-emergency/>.
- [8] Aether, "London Borough of Merton Climate Action Support," 2020. [Online]. Available: <https://www.merton.gov.uk/planning-and-buildings/sustainability-and-climate-change/climate-emergency>.
- [9] London Energy Transformation Initiative, "Climate Emergency Design Guide," 2020. [Online]. Available: <https://www.leti.london/cedg>.
- [10] Currie & Brown, "A Report for the Committee on Climate Change – The costs and benefits of tighter standards for new buildings," 2019. [Online]. Available: <https://www.theccc.org.uk/wp-content/uploads/2019/07/The-costs-and-benefits-of-tighter-standards-for-new-buildings-Currie-B>.
- [11] Committee on Climate Change, "UK Housing: Fit for the future?," 2019. [Online]. Available: <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>.
- [12] Etude, Elementa, Levitt Bernstein, Currie & Brown, "Towards Net Zero Carbon – Achieving greater carbon reductions on site: The role of carbon pricing," 2020. [Online]. Available: <https://www.haringey.gov.uk/environment-and-waste/going-green/reducing-co2-emissions>.
- [13] Zero Carbon Hub, "Fabric Energy Efficiency for Zero Carbon Homes - A flexible performance standard for 2016," Zero Carbon Hub. [Online]. Available: http://www.zerocarbonhub.org/sites/default/files/resources/reports/Fabric_Energy_Efficiency_for_Zero_Carbon_Homes-A_Flexible_Performance_Standard_for_2016.pdf.
- [14] Etude, "Islington Energy Evidence Base," 2016/2017. [Online]. Available: <https://www.islington.gov.uk/-/media/sharepoint-lists/publicrecords/planningandbuildingcontrol/publicity/publicnotices/20182019/20181121islingtonenergyevidencebasestudynovember20171.pdf?la=en&hash=164DFE701FAE92BDEDD1FF9091505FD769BCC0-https://www.islington.gov.uk/-/media/sharepoint-lists/publicrecords/planningandbuildingcontrol/publicity/publicconsultation/20212022/20210718islingtonenergyevidencebasestudynovember2017.pdf?la=en&hash=B9F5B29BFE300D8481FD55325CF434DA12815104>.
- [15] London Energy Transformation Initiative, "Future Homes Part L Consultation – Key messaging," 2020. [Online]. Available: <https://www.leti.london/part-l>.
- [16] Mayor of London, "Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings - Response from the Mayor of London (Consultation response)," 2020. [Online]. Available: https://www.london.gov.uk/sites/default/files/fhs_consultation_response.pdf.
- [17] Committee on Climate Change, "Letter: Future Homes Standards and proposals for tightening Part L in 2020," 2020. [Online]. Available: <https://www.theccc.org.uk/publication/letter-future-homes-standard-and-proposals-for-tightening-part-l-in-2020/>.
- [18] UK Green Building Council, "UKGBC Response to MHCLG Consultation on the Future Homes Standard," 2020. [Online]. Available: <https://www.ukgbc.org/wp-content/uploads/2020/02/UKGBC-Response-to-MHCLG-Future-Homes-Standard-Consultation-FINAL.pdf>.

- [19] Mayor of London, "London Environment Strategy - Appendix 2: Evidence Base," [Online]. Available: https://www.london.gov.uk/sites/default/files/les_appendix_2_-_evidence_base_0_0.pdf.
- [20] BNP Paribas, "Merton Local Plan Housing Viability Study," 2020. [Online]. Available: <https://www.merton.gov.uk/assets/Documents/Merton%20Local%20Plan%20Housing%20Viability%20Study%202020.pdf>.
- [21] Department for Business, Energy & Industrial Strategy, "Clean growth – Transforming Heating. Overview of Current Evidence," 2018. [Online]. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/766109/d_eicarbonising-heating.pdf.
- [22] Passivhaus Trust, "Passivhaus: the route to zero carbon," 2019. [Online]. Available: https://www.passivhaustrust.org.uk/guidance_detail.php?gId=40.
- [23] Zero Carbon Hub, "Closing the gap between design and as-built performance - Evidence Review Report," 2014. [Online]. Available: http://www.zerocarbonhub.org/sites/default/files/resources/reports/Closing_the_Gap_Between_Design_and_As-Built_Performance-Evidence_Review_Report_0.pdf.
- [24] UKGBC, "[Net Zero Whole Life - Summary for Policy-Makers](https://www.ukgbc.org/wp-content/uploads/2021/11/UKGBC-Whole-Life-Carbon-Roadmap-Summary-for-Policy-Makers.pdf)," 2021. [Online]. Available: <https://www.ukgbc.org/wp-content/uploads/2021/11/UKGBC-Whole-Life-Carbon-Roadmap-Summary-for-Policy-Makers.pdf>. [Accessed 22 11 2021].
- [25] Bioregional, Etude, Currie & Brown, "[Greater Cambridge Local Plan: Net Zero Carbon Evidence Base. Task D - Technical Feasibility](https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/NetZeroTechnicalFeasibility_GCLP_210831.pdf)," May 2021. [Online]. Available: [Feasibility study https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/NetZeroTechnicalFeasibility_GCLP_210831.pdf](https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/NetZeroTechnicalFeasibility_GCLP_210831.pdf).
- [26] Bioregional, Etude, Currie & Brown, Mode, "[Greater Cambridge Net Zero Carbon Evidence Base Non-technical summary](https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Greater%20Cambridge%20Local%20Plan%20Net%20Zero%20Carbon%20Evidence%20Base%20-%20Non%20Technical%20Summary%20FINAL.pdf)," August 2021. [Online]. Available: <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Greater%20Cambridge%20Local%20Plan%20Net%20Zero%20Carbon%20Evidence%20Base%20-%20Non%20Technical%20Summary%20FINAL.pdf>.
- [27] Department for Business, Energy & Industrial Strategy (BEIS), "Clean Growth Strategy," 2017. [Online]. Available: <https://www.gov.uk/government/publications/clean-growth-strategy>.
- [28] Energy Technologies Institute, "Smart Systems and Heat - Decarbonising Heat for UK Homes," 2015. [Online]. Available: <https://s3-eu-west-1.amazonaws.com/assets.eti.co.uk/legacyUploads/2015/03/Smart-Systems-and-Heat-Decarbonising-Heat-for-UK-Homes-1.pdf>.
- [29] Etude, "A report for the GLA - Low Carbon Heat: Heat Pumps in London," 2018. [Online]. Available: https://www.london.gov.uk/sites/default/files/low_carbon_heat_-_heat_pumps_in_london_.pdf.
- [30] Committee on Climate Change, "An independent assessment of the UK's Clean growth Strategy - From ambition to action," 2018. [Online]. Available: <https://www.theccc.org.uk/wp-content/uploads/2018/01/CCC-Independent-Assessment-of-UKs-Clean-Growth-Strategy-2018.pdf>.
- [31] Committee on Climate Change, "Hydrogen in a low-carbon economy," [Online]. Available: <https://www.theccc.org.uk/publication/hydrogen-in-a-low-carbon-economy/>.
- [32] Mayor of London, "The London Plan - Intend to Publish," 2019. [Online]. Available: https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf.
- [33] AECOM, "District Heating Feasibility – Phase 1: Heat Mapping and Energy Masterplanning," 2017. [Online]. Available: https://www.merton.gov.uk/assets/Documents/www2/merton_heatmapping_study_fullreport.pdf.
- [34] AECOM, "District Heating Feasibility – Phase 2: Developments and Financial Modelling," 2018. [Online]. Available: <https://www.merton.gov.uk/assets/Documents/www2/Merton%20DH%20Financial%20Modelling%20Report%20FINAL.pdf>.
- [35] Carbon Trust, "An analysis of electricity system flexibility for Great Britain," 2016. [Online]. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/568982/An_analysis_of_electricity_flexibility_for_Great_Britain.pdf.
- [36] Imperial College of London, "Analysis of Alternative UK Heat Decarbonisation Pathways," 2018. [Online]. Available: <https://www.theccc.org.uk/wp-content/uploads/2018/06/Imperial-College-2018-Analysis-of-Alternative-UK-Heat-Decarbonisation-Pathways.pdf>.

-
- [37] C. & L. G. Ministry of Housing, "Guidance - National Design Guide," 30 01 2021. [Online]. Available: <https://www.gov.uk/government/publications/national-design-guide>.
- [38] LETI, "Defining and Aligning: Whole Life Carbon & Embodied Carbon," 2021. [Online]. Available: <https://www.leti.london/carbonalignment>.
- [39] Waterwise, "UK Manifesto 2009/2010," 2009. [Online]. Available: <https://waterwise.org.uk/knowledge-base/waterwise-manifesto-2009-2010/>.
- [40] MetOffice, "UK Climate Averages," 2020. [Online]. Available: <https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcpv7fnqu>.
- [41] Environment Agency, "Water Stressed Areas - Final Classification," 2013. [Online]. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf.
- [42] Committee on Climate Change, "Under Pressure - Preparing for UK water shortages," 2017. [Online]. Available: <https://www.theccc.org.uk/2017/09/12/pressure-preparing-uk-water-shortages/>.
- [43] Zero Carbon Hub, "Defining a Fabric Energy Efficiency Standard for Zero Carbon Homes," 2009. [Online]. Available: http://www.zerocarbonhub.org/sites/default/files/resources/reports/Defining_a_Fabric_Energy_Efficiency_Standard-Executive_Summary.pdf.
- [44] Mayor of London, "'Be Seen' Energy Monitoring Guidance," 2020. [Online]. Available: https://www.london.gov.uk/sites/default/files/gla_be_seen_guidance_april_2020.pdf.
- [45] Building Research Establishment, "Overheating in Dwellings Guidance Document," 2016. [Online]. Available: <https://www.bre.co.uk/filelibrary/Briefing%20papers/116885-Overheating-Guidance-v3.pdf>.
- [46] Good Homes Alliance, "Overheating in New Homes - Tool and guidance for identifying and mitigating early stage overheating risks in new homes," 2019. [Online]. Available: <https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance.pdf>.
- [47] Mayor of London, "London Sustainable Drainage Action Plan," 2016. [Online]. Available: https://www.london.gov.uk/sites/default/files/lldap_december_2016.pdf.
- [48] H. Government, "Energy White Paper - Powering our Net Zero Future," 2020. [Online]. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf.
- [49] E. E. E4tech, "Cost analysis of future heat infrastructure options," 2018. [Online]. Available: <https://nic.org.uk/app/uploads/Element-Energy-and-E4techCost-analysis-of-future-heat-infrastructure-Final.pdf>.
- [50] NBS, "Climate change adaptation in buildings: Subsidence," 06 January 2014 . [Online]. Available: <https://www.thenbs.com/knowledge/climate-change-adaptation-in-buildings-subsidence>.

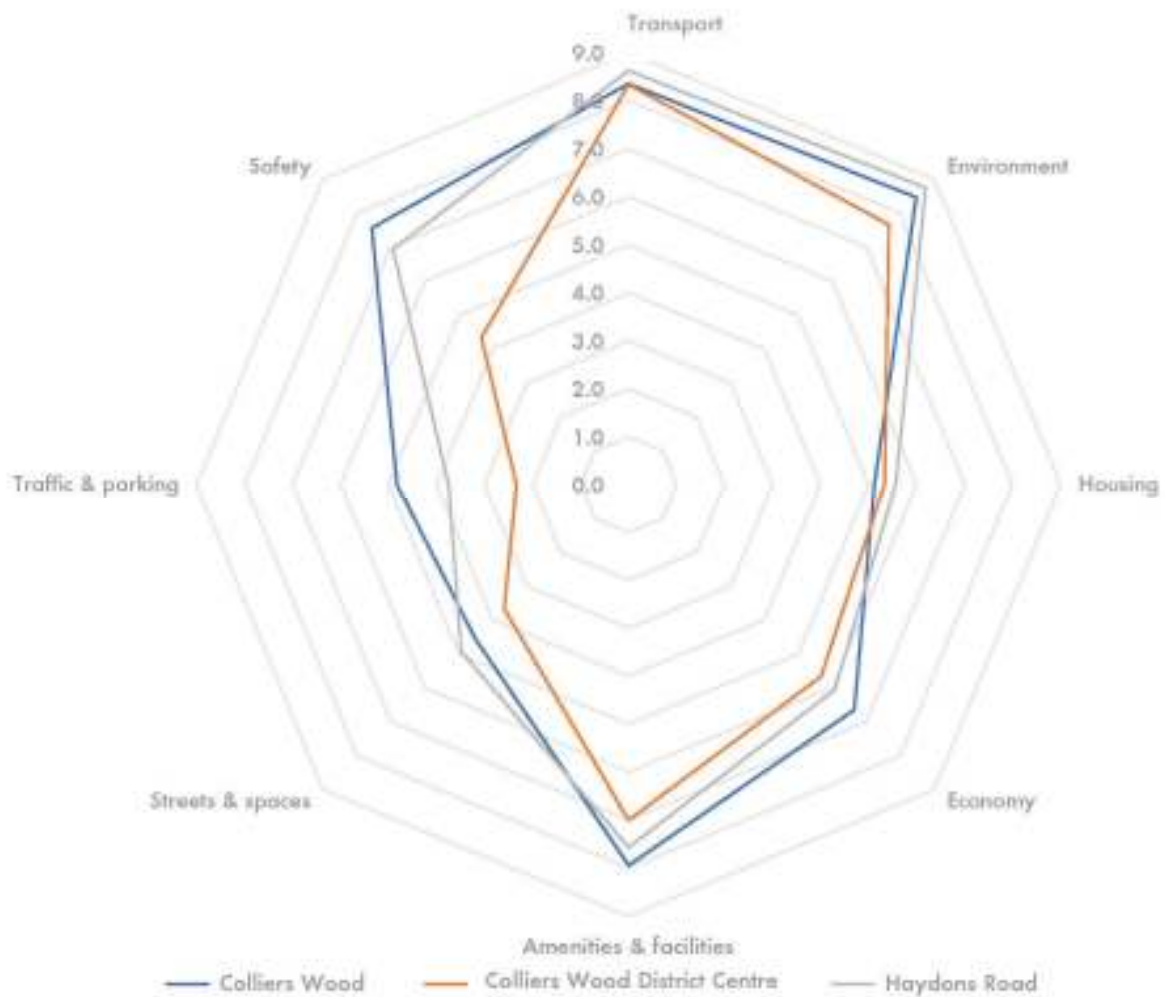


CHAPTER 03. COLLIERS WOOD



PLACE PROFILE: COLLIERS WOOD

As part of the Borough’s ongoing Character Study, 415 Merton residents took part in this survey, of which 37 people lived in Colliers Wood. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform the Borough Character Study 2021.



Results from residents of Colliers Wood rating their neighbourhood

KEY OBJECTIVES: COLLIERS WOOD

The following objectives provide an overarching vision for Colliers Wood.



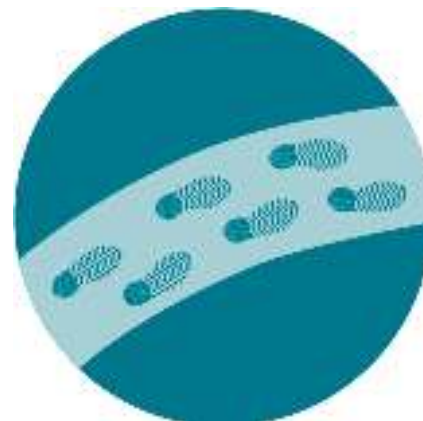
Create a new District Centre.

Building on the improvements led by 'Connecting Colliers Wood', support the redevelopment of retail outlets to create new streets and attractive public spaces providing homes above shops, and help make Colliers Wood easier to navigate for pedestrians and cyclists.



Better access to heritage

Improve access to heritage assets, conserving and enhancing archaeological sites and recognising their positive contribution to regeneration and new development.



Promote active travel.

Support improvements to the Wandle Trail and other transport infrastructure that will help to reduce road congestion and improve the public realm, particularly for pedestrians and cyclists.

CHARACTER: COLLIERS WOOD

These photos illustrate the diverse character found across Colliers Wood.





COLLIERS WOOD: POLICY N3.1

To create a thriving and attractive District Centre at Colliers Wood. The council's strategy for Colliers Wood is:

Colliers Wood town centre

- a. To treat Colliers Wood as a District Centre in the town centre hierarchy.
- b. To build on the improvements led by "Connecting Colliers Wood" by requiring development to help create coherent spaces of high-quality design, reconfiguring the centre to create a focus and making the environment more attractive to town centre users, prioritising pedestrians and cyclists.
- c. To support the redevelopment of single or two storey retail outlets to create new streets and public spaces, provide homes above shops, and help make Colliers Wood easier to navigate and move around.
- d. To support a variety of different sized shop units and town centre uses to provide local services and encourage resilience.
- e. To work with the Environment Agency, the GLA (Greater London Authority), Thames Water and landowners to reduce flood risk and to explore viable and appropriate flood mitigation measures complementary with improving the public realm, particularly for pedestrians and cyclists.
- f. To improve access to heritage assets including Merton Priory, Merton Abbey Mills and Wandle Valley Conservation Area, conserving and enhancing archaeological sites and recognising their positive contribution to regeneration and new development.
- 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.](#)

Surrounding area of Colliers Wood

- h.** To support development which helps to optimise housing potential and that maximises opportunities for use of sustainable modes of travel in this highly accessible location whilst managing vehicle use to reduce impacts on the road network.
- i.** To improve the public realm in accordance with the Healthy Streets Approach and providing an improved network of safe and convenient pedestrian and cycle routes that connect to local areas and beyond, including via the Wandle Trail and Cycleway 7.
- j.** To work with the Environment Agency, Thames Water, landowners and others to reduce flood risk and to explore viable and appropriate flood mitigation measures complementary with improving the public realm.
- k.** To support improvements to the Prince Georges' business area.

JUSTIFICATIONS SUPPORTING TEXT

- 3.1.1.** Colliers Wood, as a town centre, has many unique assets including Merton Priory, the Wandle Park and a vibrant market at Merton Abbey Mills.
- 3.1.2.** The town centre is situated along the river Wandle, linked by the Wandle Trail and is at the heart of the Wandle Valley Regional Park.
- 3.1.3.** It has excellent public transport and road links. Colliers Wood underground station and the frequent bus services give residents, visitors and workers a variety of travel options with excellent Public Transport Accessibility Level (PTAL). Colliers Wood is situated on the A24 road and is the start of the Mayor of London's Cycle Superhighway 7, an 8.5-mile cycle trail starting from Colliers Wood to the City of London.
- 3.1.4.** The past 10 years has seen significant investment in Colliers Wood which has transformed the look and feel of the town centre, particularly at the point of arrival from the underground station. The catalyst was the redevelopment of Britannia Point, (formerly the Brown and Root building, winner of London's Ugliest Building vote) and over £3 million investment in "Connecting Colliers Wood" by the Mayor of London, Transport for London, Merton Council and developers.
- 3.1.5.** Colliers Wood now has a new public square at the heart of the town centre, a new purpose-built library, shopfront improvements and nearly 300 new homes, better connections to the surrounding neighbourhoods and the wider Wandle Valley Regional Park particularly at the Baltic Close entrance to the Wandle Park.
- 3.1.6.** Improvements to the street scene, pedestrian crossings and junction improvements have provided better conditions for cyclists and pedestrians while smoothing the flow of traffic passing through the town centre, making Colliers Wood a safer place to walk and cycle to and around. A new health centre is being developed.
- 3.1.7.** There are some key sites within Colliers Wood which still feel disconnected from the Colliers Wood area and from each other, despite being adjacent or within easy walking distance of each other. Consultees to Stage 1 Local Plan identified Sainsbury's Supersaver, Priory Retail Park and the Tandem Centre as unattractive, inward-looking, lacking in recent investment, car-dominated; they also identified the pavements and public realm along Merantun Way as in need of similar investment to encourage walking and cycling and improve the links between the sites.

- 3.1.8.** These three sites at Sainsbury's Supersaver, Priory Retail Park and the Tandem Centre are in single freeholds but with multiple tenancies. These three sites currently support a significant number of jobs and businesses and provide town centre shops and services. However, should redevelopment opportunities come up within the lifetime of this Plan, the Council would strongly support more efficient use of these sites, continuing to support shops, services and business floorspace and providing new homes on upper floors where practicable. Creating more traditional street formats within these sites – with active frontages on the ground floor and offices or flats above shops - would make more efficient use of valuable land and help make Colliers Wood easier to navigate. We will also support measures that improve public transport access, walking, cycling, air quality and help minimise road congestion, noise and excess traffic within Colliers Wood.
- 3.1.9.** Merton supports the Mayor of London's proposal that Colliers Wood is part of the new London Plan's proposed Opportunity Area at "*Wimbledon / South Wimbledon / Colliers Wood*", with a target of 5,000 homes and 6,000 jobs.

Colliers Wood as a District Centre

- 3.1.10.** For the past five years, Colliers Wood has already functioned as a District Centre. It contains a broad mix of store sizes and formats, a variety of town centre uses (shops, markets, restaurants, theatre, visitor attractions, public space, restaurants, library, etc.) and since the Connecting Colliers Wood investment is now well integrated into the surrounding area. The council is treating Colliers Wood town centre as a District Centre for planning purposes. The alternative would be for Colliers Wood to be considered an "out of centre" location in planning terms. In this circumstance, we would not be able to encourage new town centre uses in Colliers Wood as supporting large "out of centre" shops, offices and leisure development is contrary to the NPPF (National Planning Policy Framework) [2019 2021](#) (chapter 7), the London Plan and Merton's own planning policies.
- 3.1.11.** Given the existing volume of retail floorspace in Colliers Wood and the changing nature of how we all shop, it is not the council's intention to significantly increase the quantity of retail offer in Colliers Wood but to encourage the provision of a mix of different sized premises and a wider range of business types (e.g. gyms, restaurants, social activities) to serve residents and support a more resilient town centre.

London's Opportunity Area at Wimbledon / South Wimbledon / Colliers Wood

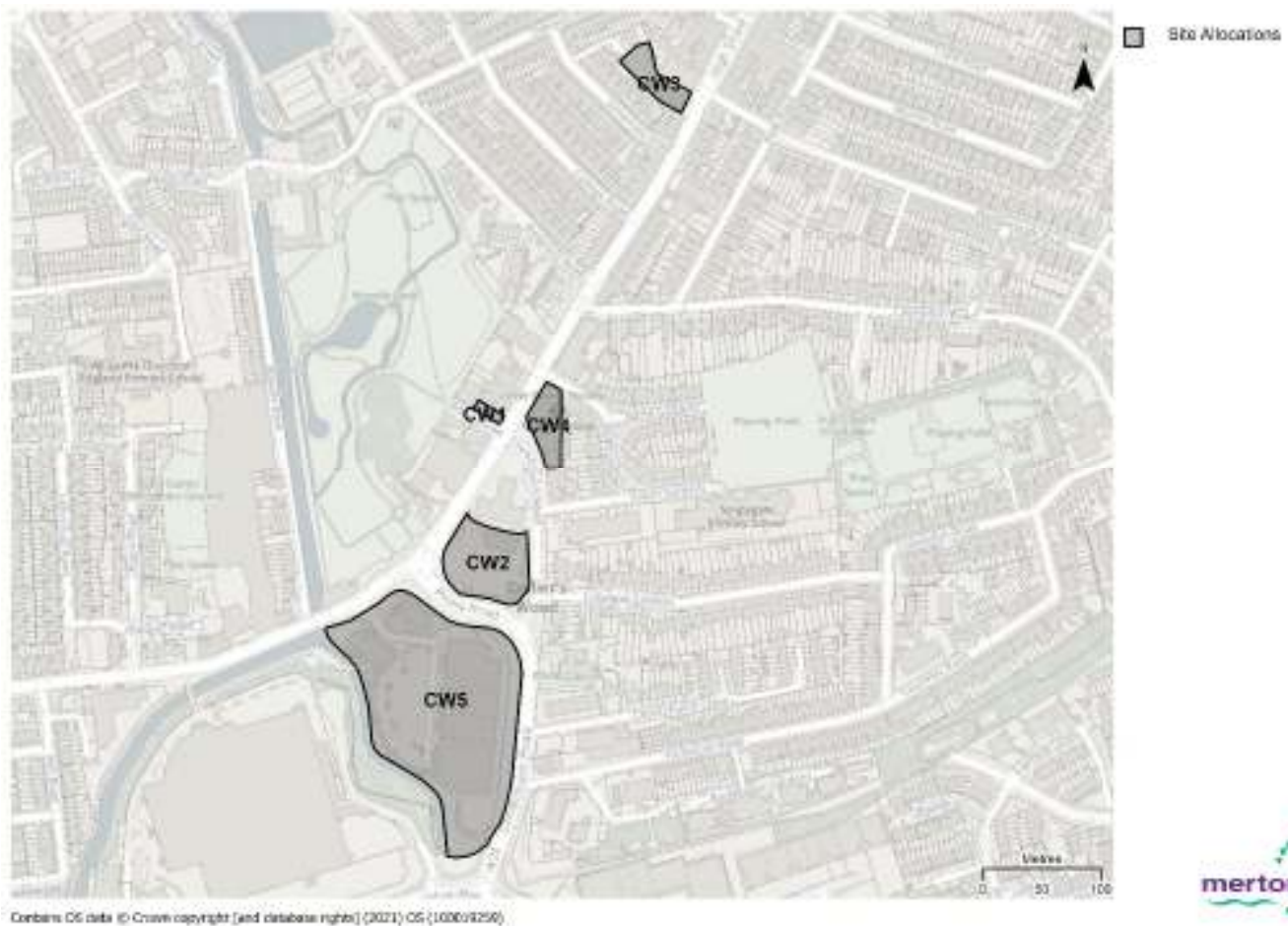
- 3.1.12. The London Plan has identified a new Opportunity Areas in Merton directly including “Wimbledon, Colliers Wood / South Wimbledon”, with an indicative capacity for 5,000 new homes and 6,000 jobs.
- 3.1.13. Crossrail2 construction has been delayed and will not be finished until after 2036, therefore the benefits from over-station development in Wimbledon or development on sites that are currently safeguarded by Crossrail2 will arise outside this Local Plan period.
- 3.1.14. However, there are opportunities outside the immediate Wimbledon area in Colliers Wood, South Wimbledon and Morden to work towards delivering the London Plan's proposed Opportunity Area targets for homes and jobs, even if the Crossrail2 sites will not be realised within this Plan period.
- 3.1.15. The regeneration of Morden is proposed to deliver circa 2,000 new homes and another c2,000 homes will be delivered around South Wimbledon, mainly via estate regeneration during the lifetime of this plan. For jobs growth, South Wimbledon Business Area is already one of south London's largest and most successful business areas (outside town centres) and we will continue to support this Strategic Industrial Location.
- 3.1.16. The primary location for business and jobs growth is Wimbledon town centre, which is an internationally recognised, highly accessible and most attractive location for office-based business. There are clear opportunities for business space and jobs growth in Wimbledon town centre out with Crossrail2, for example along the Broadway, St George's Road and Worple Road within the. However, there are some significant sites (Wimbledon Bridge House, the area around Centre Court, Wimbledon Station and adjoining Alexandra Road, Dundonald Goods Yard) which are safeguarded for Crossrail2 development so won't provide significant new business space and job opportunities until Crossrail2 is finishing beyond in the 2030s.
- 3.1.17. Colliers Wood has opportunities for new homes and jobs within the town centre. The town centre already supports a significant number of jobs in retailing and other town centre uses, and the council will continue to support these.

-
- 3.1.18.** Colliers Wood town centre may be an appropriate location to accommodate higher density development including tall buildings. Britannia Point should remain the pinnacle building in the town centre in terms of height. This can then form the basis for a coherent group of buildings that relate well to each other in terms of scale, massing, form and architecture. New buildings must be designed, orientated and laid out within the site and within the context of nearby buildings and structures to mitigate the potential for uncomfortable wind conditions at ground level, which would particularly affect pedestrians and cyclists.
- 3.1.19.** Locations that may be sensitive to tall buildings include the historic environments of the Wandle Park, Merton Abbey Mills and Merton Priory where the potential impact on the significance and scale of the historic environment and open spaces should be considered. For locations near to the edge of the town centre boundary, the sensitivity of low-rise residential neighbourhoods should be considered.
- 3.1.20.** The heritage of the Wandle Valley is a particularly important part of the history of the borough and an important element of Merton's identity. Development proposals in Colliers Wood and its surrounds should strengthen the character and local distinctiveness of the area by playing a positive role in relation to the heritage assets, which include Merton Priory and the [Wandle Valley Conservation Area](#).
- 3.1.21.** Currently, Colliers Wood and the surrounding neighbourhood are not considered attractive to the office market. Creation of an attractive, permeable environment in central Colliers Wood with a better street layout, a greater mix and a wider range of non-retail uses could make Colliers Wood a more desirable destination for office-based businesses, including shared workspaces, in turn increasing the employment potential of the centre.
- 3.1.22.** Environmental factors, particularly the risk of flooding, as identified in the Sustainability Appraisal and the [Strategic Flood Risk Assessment 2018](#), will need to be mitigated against before Colliers Wood can deliver to its full potential. Flood mitigation measures and any other environmental considerations will have to be economically viable and in line with the overall aim of creating a thriving and attractive town centre if they are to benefit the area.

Site Allocations

Site allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a site allocations will be determined against planning polices (including the London Plan).



SITE CW1: Baltic Close 194-196 High Street Colliers Wood, SW19 2BN



Ward: Colliers Wood
<p>Site description: The site is a hardstanding area on the corner of High Street Colliers Wood and Baltic Close, a recently refurbished pedestrian and cycle route from High Street Colliers Wood to the Wandle Park. At the opposite side of Baltic Close to the southwest of the site is a three-storey public house (The Charles Holden). To the west of the site is a four-storey residential block (Oslo Court) with the Wandle Park beyond.</p> <p>The High Street Colliers Wood frontage of the site if adjoined on the northern side by a three-storey shopping parade with shops at the ground level and flats above. The site is directly opposite Colliers Wood underground station. The site is close to the A24 which forms part of the Transport for London Road Network (TLRN). The site is located 140m east of the River Wandle.</p>
Site owner: Transport for London (TfL)
Site area: 0.02ha
Existing uses: Hard standing area – fenced off.
Site allocation: Residential and commercial mixed-use scheme
Site deliverability: 0-5 years
Indicative site capacity (new homes): 1- 4 new homes
Design and accessibility guidance:

The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for new homes and jobs is 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA (Opportunity Area) and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

Development must respect the character, heritage assets and the views into and from the neighbouring conservation area and the setting of the listed building (Colliers Wood tube station) found to the east of the site.

Development should protect and enhance the existing cycle and pedestrian route.

~~The site-TfL’s strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. However, there is a lack of space on the public highway to facilitate this. Should residential or commercial-mixed use development not take place on Site CW1, then we would welcome a secure cycle hub on this site as it is opposite the underground station and accessible to both the Wandle Trail and the Cycle Superhighway. There is also an anticipated requirement for space to accommodate docking areas to facilitate future cycle or scooter hire schemes considering the high expected demand in this location so, this site may be required to make provision for docking areas for cycle/ scooter hire schemes in proximity to the public highway.~~

The site is within Flood Zone 2 however, it is noted that when considering the impact of climate change, the site is shown to be at risk of flooding from the River Wandle.

Development proposals must incorporate the recommendations of Merton’s Strategic Flood Risk Assessment (SFRA).

Infrastructure Requirements:

~~There is a need for secured cycle parking provision for commuters in Colliers Wood and there is a lack of space on the public highway to facilitate this. Should residential development not take place on Site CW1, then we would welcome a secure cycle hub on this site as it is opposite the underground station and accessible to both the Wandle Trail and the Cycle Superhighway.~~

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. ~~have regard to Merton’s Infrastructure Delivery Plan.~~

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engages with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport for London Road Network (TLRN) - no new access or servicing take place from the A24 road, advice from TfL.

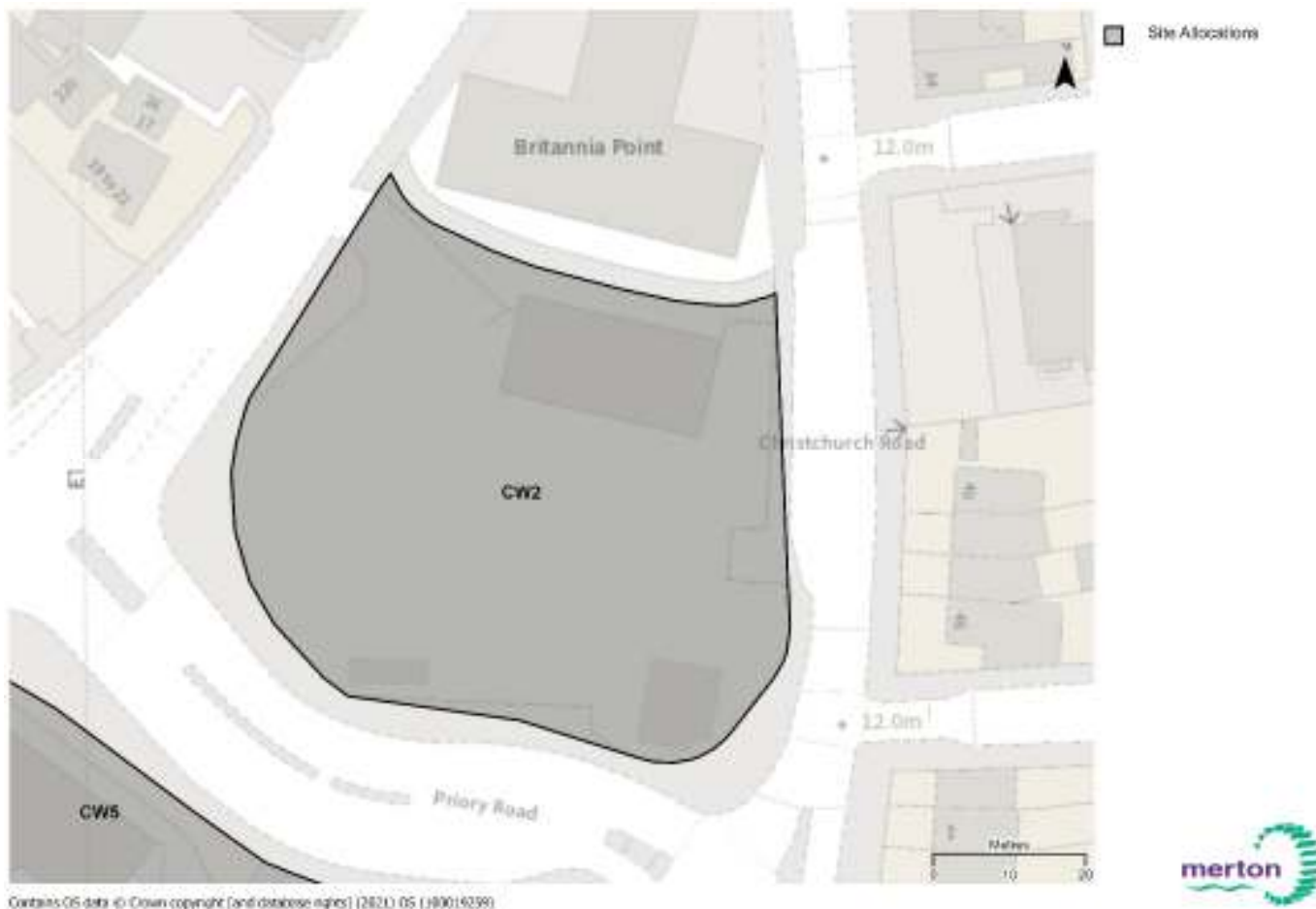
The site location.

Impacts Listed Buildings or undesignated heritage assets.

Opposite Colliers Wood underground station building which is Grade II listed.

Impacts a Conservation Area	Wandle Valley Conservation Area.
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts flooding on flood from all sources.	Flood zone 2 and in an area of critical drainage issues.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts on a designated open space.	Site is within the Wandle Valley Regional Park 400m buffer area. The site is close to Wandle Park a designated Open Space, Metropolitan Open Land, Wandle Valley Regional Park.
Impacts ecology designation.	Site is close to a Site of Importance for Nature Conservation (SINC) and Green Corridor at Wandle Park.
Public Transport Accessibility Level (PTAL)	PTAL 6A excellent access to public transport.

SITE CW2: Car Park South of Britannia Point, 125 High Street Colliers Wood, SW19 2JG



Ward: Colliers Wood

Site description:

A prominent site within the Colliers Wood Town Centre boundary, to the south of the existing Britannia Point as the second phase of the same development. The Council has proposed the site allocation to give certainty to the delivery of this site for town centre type uses on the ground floor with residential development on upper floors.

The site was a multi-storey car park and formerly a small retail shed, now both demolished. The site lies due south of Britannia Point (formerly Brown and Root), a development of c170 apartments with commercial on the ground floor. To the south lies Priory Road with Priory Retail Park at the other side. To the east lies Christchurch Road with a church and homes facing the site. To the west, across the A24 lies the Wandle Park.

The site is within 100m of Colliers Wood underground station and served by a variety of bus routes. The site is within c50m of London Underground subsurface tunnels and infrastructure; therefore, London Underground Infrastructure Protection must be consulted.

Significant investment has been made in the public realm for walking and cycling in and around the site by the adjacent Britannia Point landowners, Merton Council and TfL (Transport for London) as part of the [Connecting Colliers Wood](#) regeneration project.

Site owner: Criterion Capital.
Site area: 0.43ha ha
Existing uses: Vacant
Site allocation: 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.
Site deliverability: 5-10 years
Indicative site capacity (new homes): 150- 220 new homes.
<p>Design and accessibility guidance:</p> <p>The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for new homes and jobs is 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA (Opportunity Area) and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.</p> <p>Delivery of new homes within the Wimbledon/ South Wimbledon / Colliers Wood Opportunity Area in a universally accessible sustainable location on an unused brownfield site.</p> <p>Development will need to be of a scale, layout and design to minimise harm to the residential amenity of the existing residents in Britannia Point and on Christchurch Road. Development must be based the principle of the existing Britannia Point building remaining the pinnacle in terms of height, with other buildings forming a coherent cluster that enhances the wider Colliers Wood area.</p> <p>Development will need to continue and contribute to the public realm improvements delivered via Connecting Colliers Wood with Britannia Point landowners, Merton Council and Transport for London.</p> <p><u>TfL's strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. However there is a lack of space on the public highway to facilitate this, so this site may be required to make provision for an appropriate amount and type of publicly accessible cycle storage for commuters. There is also an anticipated requirement for space to accommodate docking areas to facilitate future cycle or scooter hire schemes considering the high expected demand in this location so, where appropriate, development may be required to make some provision for docking stations for cycle/scooter hire schemes in proximity to the public highway.</u></p> <p>Development must enhance pedestrian and cycle access routes around the site to improve the wider cycle and pedestrian network.</p> <p>In a mixed-use development, residential uses should be on the upper floors.</p> <p>Development should optimise the use of the site and compliment the surrounding area, including the existing building at Britannia Point and the views from the Metropolitan Open Land.</p> <p>Development will need to create and provide an active street frontage along Christchurch Road, Priory Road and High Street Colliers Wood on the ground floors adding natural surveillance.</p> <p>Development will need to complement the surrounding area including Britannia Point and the views from the Metropolitan Open Land at Wandle Park</p>

The potential impact of any proposed development on archaeological heritage needs to be investigated.

Development proposals will need to incorporate all the site-specific flood mitigation recommendations in the Merton's Strategic Flood Risk Assessment (SFRA) associated with the site and surrounding area. A sequential approach should be applied within the site, steering development towards those areas where the hazard rating is lower and at lower risk of surface water flooding.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~

Any development proposal for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

This site is in close proximity to National Grid infrastructure YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.

Thames Water have indicated that the scale of development for this site that, upgrades of the water supply network infrastructure and wastewater network and sewage treatment infrastructure are likely. It is recommended that the developer with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.

The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council requires as part of any submitted planning application evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport for London Road Network (LTRN) - no new access or servicing take place from the A24, advice from TfL.

The site is within c50m of London Underground subsurface tunnels and infrastructure; therefore, London Underground Infrastructure Protection must be consulted. The Council will require evidence that the developer has engaged with London Underground as part of the planning application. The Council will engage with London Underground Infrastructure Protection as part of the planning process.

The site location	
Approach to tall buildings	A 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 principle of the existing Britannia Point being the pinnacle height of a family of buildings of varying height, forming a coherent cluster that enhances the wider Colliers Wood area.
Impacts Listed Buildings or undesignated heritage assets.	Site is 100m away from the Colliers Wood Station listed building.
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	Yes, Wandle Valley/Colliers Wood Archaeological Priority Zone Area Tier 2.
Impacts a Scheduled Ancient Monument.	No
Impact on flooding from all sources	Yes, Flood Zone 2 and within an area susceptible to surface water flooding in a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts a designated open space.	Yes, within Wandle Valley Regional Park 400m buffer zone. Wandle Valley Regional Park, Metropolitan Open Land and designated Open Space at Wandle Park is nearby.
Impacts on an ecology designation.	Site within 500m of a Sites of Importance for Nature Conservation (SINCs) and Green Corridor.
Public Transport Accessibility Level (PTAL).	PTAL 5 Very good access to public transport.

SITE CW3: Colliers Wood Community Centre, 66-72 High Street Colliers Wood, Colliers Wood, SW19 2BY



Contains OS data © Crown copyright (and database rights) (2021) OS (100018259)

Ward: Colliers Wood
Site description: Colliers Wood Community Centre is a detached two storey building with a hexagonal rear car park. It is found on the west side of High Street Colliers Wood and is surrounded by terraced housing adjoining the site to the rear and mixed use residential and commercial buildings of two or three storeys in height along the High Street. Immediately next to the site is a new development with small supermarket on the ground floor and apartments above. The site is close to the A24 which forms part of the Transport for London Road Network (TLRN).
Site owner: Merton Council
Site area: 0.13ha
Existing uses: Community Centre
Site allocation: Mixed-use community and residential.
Site deliverability: Between 5-10 years.
Indicative site capacity (new homes): 6-10 new homes
Design and accessibility guidance: The site is within an Opportunity Area (OA designated in the London Plan). The OA has an indicative capacity of 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

Development needs to supply active frontages on the ground floor, a mix of uses including community uses on lower floor and residential on upper floors or to the rear of the site creating a more secure environment.

Development will need to appropriately manage access arrangements, parking demand, traffic and road safety impacts on neighbouring streets and local amenity.

Development proposals will need to protect the residential amenity of those properties next to, and in the vicinity of the site.

Investigation of the potential impact of any proposed development on archaeological heritage will be needed.

The proposed use of the site is compatible with the flood zone therefore the Exception Test is not needed. However, several site-specific recommendations are made in the Merton’s Strategic Flood Risk Assessment (SFRA) which must be incorporated in development proposals. Development proposals must include sustainable drainage measures.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.

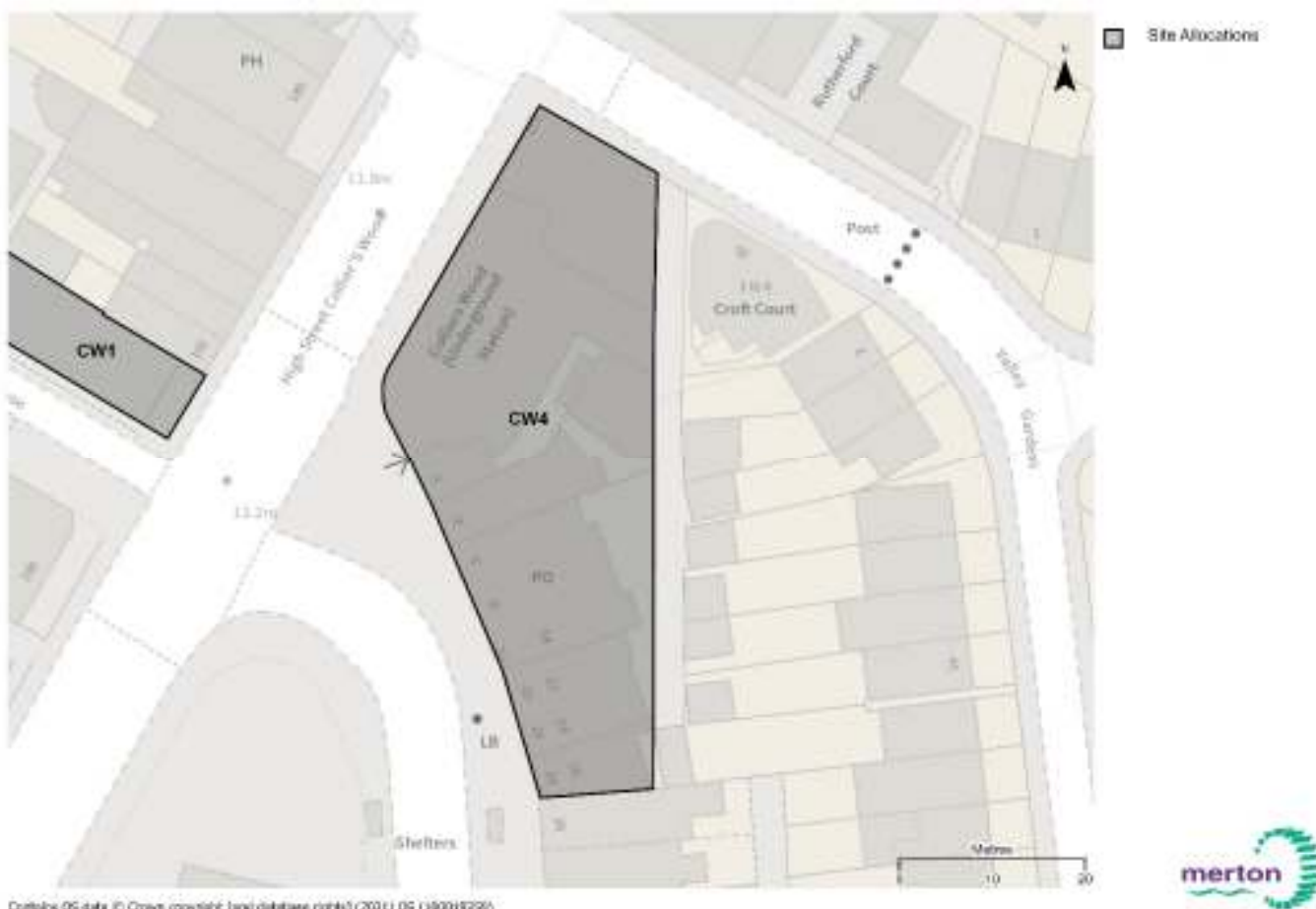
Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport for London Road Network (LTRN). Transport for London requests no new access or servicing take place from the A24. The site is within c50m of London Underground subsurface tunnels and infrastructure; therefore, developer must consult London Underground Infrastructure Protection. The Council will require evidence that the developer has engaged with London Underground as part of any submitted planning application. The Council will engage with London Underground Infrastructure as part of the planning process.

	The site location
Impacts a Conservation Area	No

Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts flooding from all sources.	Yes, Flood Zone 2 (eastern side of the site – running north to south).
Is in a town centre.	The site is within Colliers Wood town centre.
Is in an Opportunity Area	Yes
Impacts a designated open space.	Located within the 400m buffer of the Wandle Valley Regional Park.
Impact an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 5, good access to public transport services.

SITE CW4: Colliers Wood Station, 2-24 Christchurch Road, Colliers Wood, SW19 2HR



Ward: Colliers Wood

Site description: Site CW4 is owned by Transport for London as a freeholder and includes Colliers Wood underground station made of Portland stone and adjacent commercial premises, numbers 2-24 Christchurch Road. The commercial premises are occupied by a wide variety of uses including a Post Office, shops, bar / restaurant, estate agent, laundrette and takeaway.

The site faces Britannia Point (former Brown and Root building), a 19-storey residential development with commercial units on the ground floor. To the east of the site on the other side of High Street Colliers Wood are the Charles Holden public house, the Baltic Close entrance to the Wandle Park and a terrace of three storey shops. To the north of the site is Valley Road and beyond is a single storey commercial building and then the new Colliers Wood Library with apartments above which extends to 6 storeys. To the west of the site are the rear gardens of terraced houses in Valley Road.

Significant investment has been made in the public realm for walking and cycling in and around this site by the adjacent Britannia Point landowners, Merton Council and Transport for London as part of Connecting Colliers Wood. The site is close to the A24 which forms part of the Transport for London Road Network (TLRN).

Site owner: Transport for London (TfL)

Site area: 0.15ha

Existing uses: Underground station (Northern Line) and commercial premises

Site allocation: Any of the following or a suitable mix of retail, financial and professional restaurant or café, hot food takeaway, drinking establishment, leisure/health centre, offices and residential on uppers floors. The Post Office should be retained.

Site deliverability: 10 – 15 years

Indicative site capacity (new homes): 25-35 new homes.

Design and accessibility guidance:

The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for new homes and jobs is 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA (Opportunity Area) and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

TfL's strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. However there is a lack of space on the public highway to facilitate this so redevelopment of the station should make provision for an appropriate amount and type of cycle storage for commuters. There is also an anticipated requirement for space to accommodate docking areas to facilitate future cycle or scooter hire schemes considering the high expected demand in this location so, where appropriate, development may be required to make some provision for docking stations for cycle/scooter hire schemes in proximity to the public highway.

A variety of town centre use and retail should be accommodated at ground floor to supply active frontage along High Street and Christchurch Road.

Development proposals must be of a suitable density and design that responds positively to its context.

Development proposals will need to compliment the Charles Holden designed listed Underground station.

Development must optimise the use of the site and compliment the surrounding area, including the existing building at Britannia Point and the views from Baltic Close and the amenity of the residents in Valley Road.

The site is within 50m of London Underground subsurface tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.

Development will need to incorporate flood management measures as set out in Merton's Strategic Flood Risk Assessment within the design and layout to ensure the operation of this critical infrastructure (the station) and surrounding buildings. The station is classified as critical infrastructure therefore development proposals must incorporate sustainable drainage measures. The proposed use for the site is mixed-use including residential which is defined as More Vulnerable (which is allowed in Flood Zone 2). The Exception Test is not needed; however, development proposals must incorporate the recommendations of Merton Strategic Flood Risk Assessment for this site and surrounding area.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

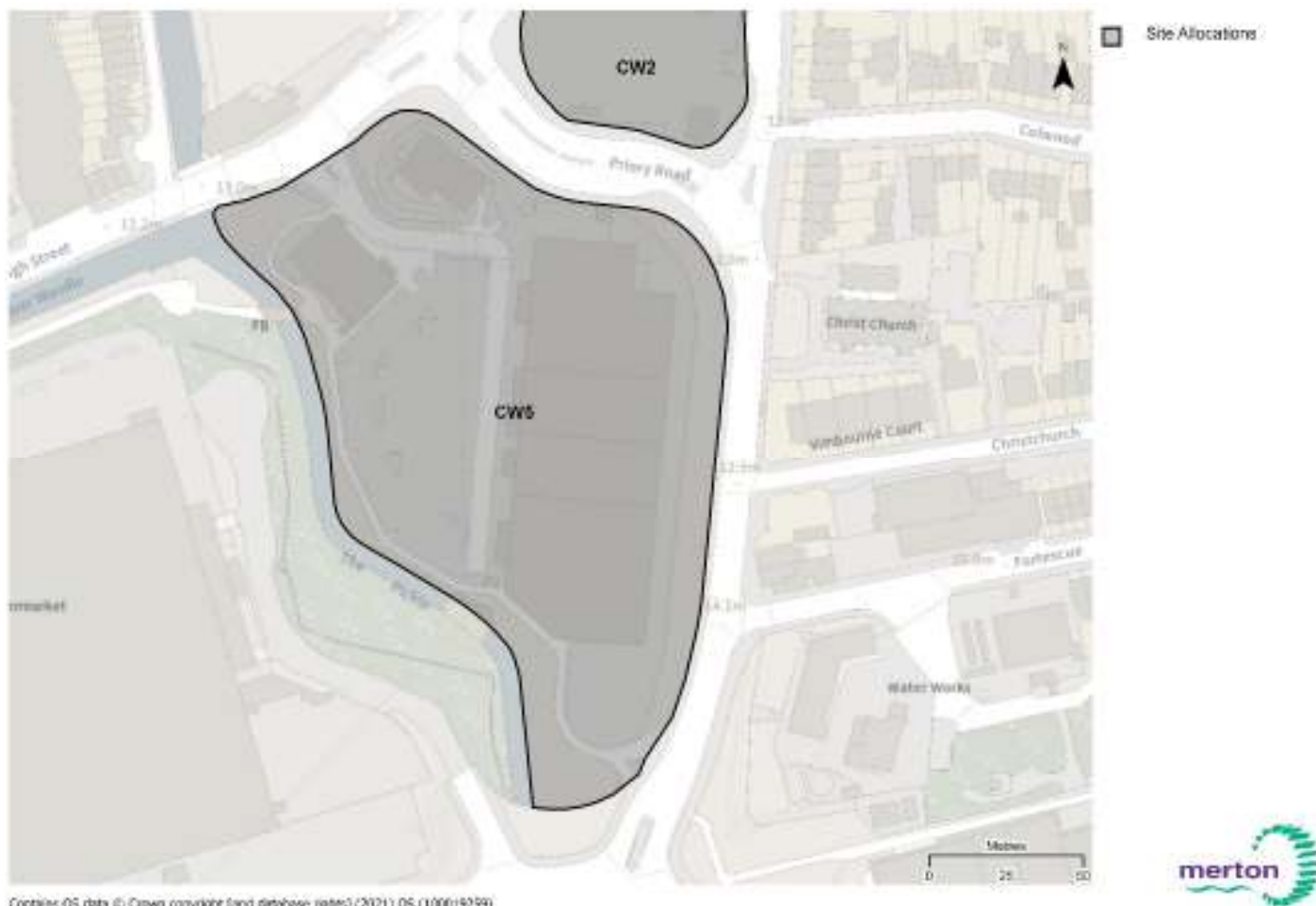
Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport of London Road Network. Transport for London requests no new access or servicing take place from the A24. As noted, it is within the consultation zone for the Northern Line tunnels and so London Underground Infrastructure Protection should be fully consulted about any sub surface works. The Council will require evidence that the developer has engaged with London Underground submitted with any planning application for the site.

~~There is a need for secured cycle parking provision for commuters in Colliers Wood and there is a lack of space on the public highway to facilitate this. In the long term, should a cycle hub not be installed on other Transport for London sites including Site CW.1, then in the long term we would welcome a secure cycle hub on this site as it is located close to the underground station and accessible to both the Wandle Trail and the Cycle Superhighway.~~

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes, station building Grade II listed
Impacts a Conservation Area	Yes
Impacts on Archaeological Priority Area	Yes, the Wandle Valley/Colliers Wood Archaeological Priority Tier 2, within the Wandle Valley Regional Park.
Impacts a Scheduled Ancient Monument	No
In on flooding from all sources	Yes, flood zone 2 (75% of the site) and within an area that is susceptible to surface water and groundwater flooding.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts a designated open space.	Yes.
Impacts an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access to public transport.

SITE CW5: Priory Retail Park, Colliers Wood, 2-24 Christchurch Road, Colliers Wood, SW19 2HR



Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)

Ward: Colliers Wood

Site description:

Priory Retail Park is a large purpose-built single storey retail warehouse with dedicated car park, divided into five retail units. Within the north of the site is a low-rise single storey drive thru' Burger King restaurant. The site is bounded by Priory Road to the north and at the other side of the road is a cleared site, (proposed for allocation as CW2 in this plan), then the 19 storey Britannia Point.

Within the north-western boundary of the site lies a two-storey building with a bar/restaurant on the ground floor and a children's soft play area on the upper floor. The site is bounded by Merton High Street and beyond views from Wandle Park.

The western boundary of the site is formed by the Pickle Ditch, a tributary of the river Wandle, a riparian green space and remnants of the historic Merton Priory Wall. The Pickle Ditch, a tributary of the river Wandle, a riparian green space and remnants of the historic Merton Priory Wall, forms the western boundary of the site. Sainsbury's and Marks and Spencer are found beyond that in a single purpose-built podium supermarket with car parking underneath.

The centre of the site is, occupied by a large surface car park. The site is accessible by car from Merton High Street to the north. The A24 (Transport for London Road Network) sets, the eastern and northern

boundary, with a substantial amount of landscape left to the eastern boundary, on which advertising hoardings sit. Electricity wires cross the site and a pylon lies within the site boundary.

Site owner: RDI REIT

Site area: 2.1ha

Existing uses: Retail sheds and a surface car park.

Site allocation: Creation of streets - a suitable mix of town centre uses on the ground and lower floors (shops financial and professional services, food and drink, office, assembly, health/day centre or other sui generis use appropriate for a town centre), residential on upper floors and public space.

Site deliverability: 10- 15 years.

Indicative site capacity (new homes): 80-120 new homes.

Design and accessibility guidance:

The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

Significant investment has been made via Connecting Colliers Wood to the public realm and street scene including the Wandle Park. Development proposals will need to contribute to and compliment the Connecting Colliers Wood in its design, layout and public realm, creating a recognisable street pattern.

Development should fully protect and enhance publicly accessible pedestrian and cycle access routes through the site and explore options for providing new links through and around the site to improve the wider cycle and pedestrian network. We will protect the existing cycle route across the site from the A24 near the Tandem Centre, which runs alongside the Pickle Ditch to Merton High Street as this allows pedestrians and cyclists to bypass the busy road network. We will also seek to incorporate a new cycle route alongside the A24 to the eastern side of the site.

Proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips through appropriately managed car parking, deliveries and servicing.

Opportunity to improve connectivity across Colliers Wood and improve the condition of the Pickle Ditch.

Development proposals must optimise the site's use for town centre type uses in a more resilient, adaptable, greener and attractive layout reducing the dominance of car parking.

Active frontages must be provided on the ground floor including along Colliers Wood High Street and the River Wandle to enhance Colliers Wood's attractiveness as a town centre.

Development proposals must incorporate sustainable drainage measures to address the issue associated with the location within a flood zone and other flooding issues. Development proposal will need to incorporate all the recommendations in the Merton's Strategic Flood Risk Assessment associated with the site and surrounding area.

In line with the Environment Agency requirements, development proposals must enhance the Pickle Stream corridor, including the removal of concrete banks, restoration of ecology to the watercourse and inclusion of a 10m wide riverside buffer strip.

The impact of development on archaeological heritage must be investigated and development proposals must respect the historic setting, including the remnants of the Merton Priory Walls.

The overhead power lines supported by electricity pylons will influence the layout, massing and potential uses on parts of the site.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water have indicated that the scale of development for this site is likely to require upgrades of the water supply network infrastructure, ~~but there are no infrastructure concerns for the~~ wastewater network ~~and~~ ~~or~~ wastewater treatment infrastructure capability. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development>

The Council will require evidence of engagement with Thames Water with any submitted planning application. The Council will also, engage with Thames Water and seek their advice about the development of this site, as part of the planning process.

The site is close to the A24 which forms part of the Transport for London Road Network (TLRN) - no new access or servicing should take place from the A24.

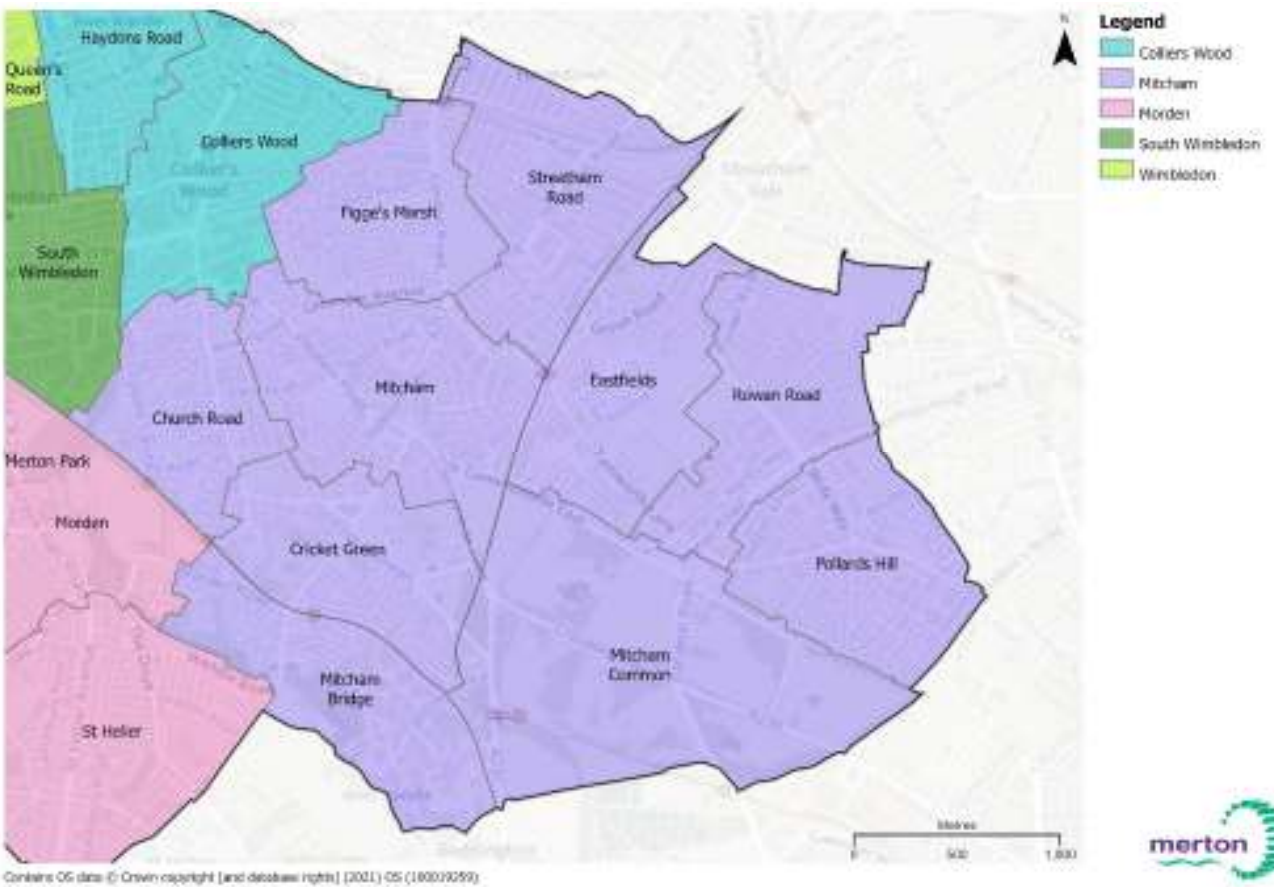
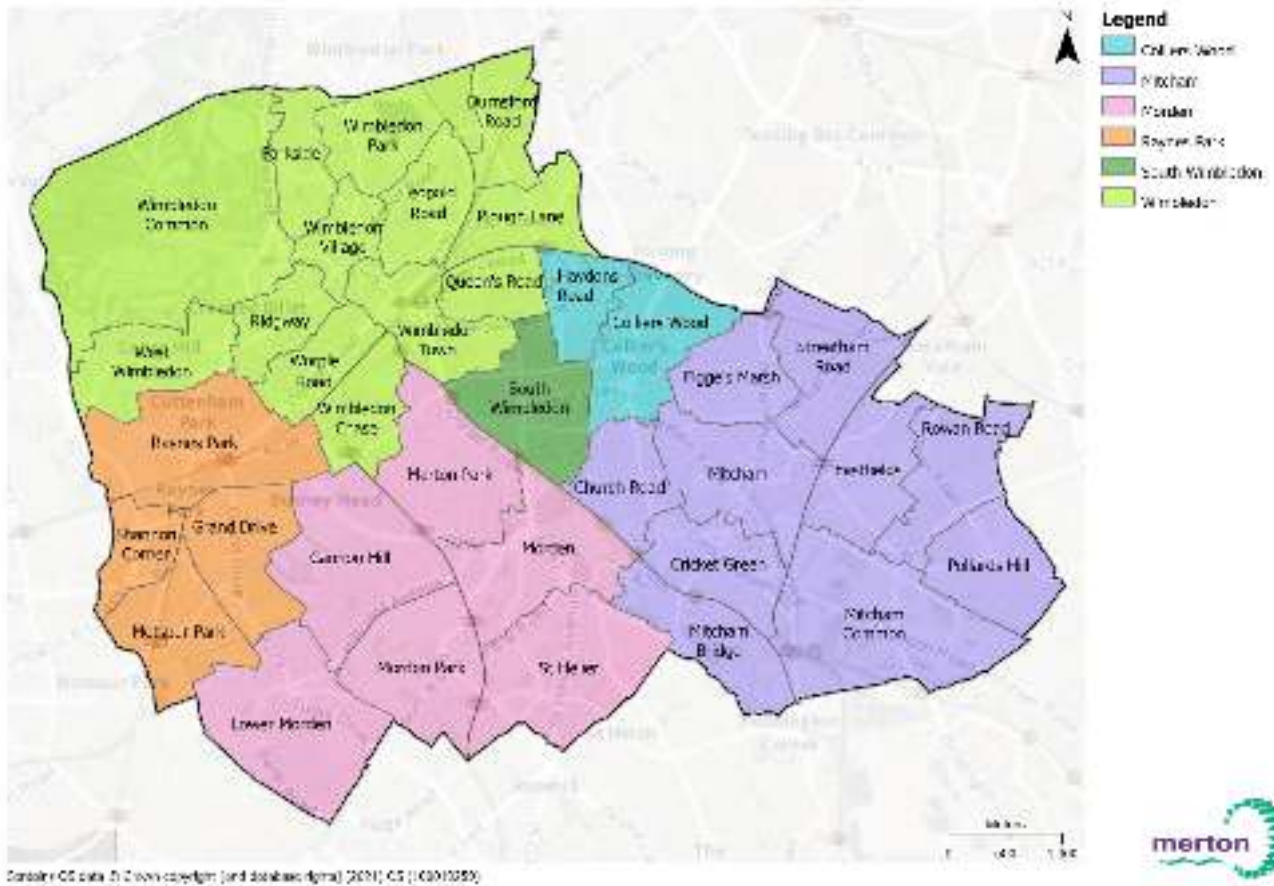
This site contains National Grid infrastructure in the form of YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton and underground cable 264681. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid’s overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.

	The site location
Impacts Listed Buildings or undesignated heritage assets.	Yes

Impacts a Conservation Area	Yes
Impacts on Archaeological Priority Area	Parts of the site hold a listed structure of Merton Priory wall remnants and are within a Archaeological p Priority zones Area Tier 2 .
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, site is within Flood Zones 2 and 3.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts a designated open space.	Parts of the site to the south are Metropolitan Open Land and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer.
Impacts on ecology designation.	Parts of the site to the south are Green Corridor and a Site of Importance for Nature Conservation.
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access to public transport.

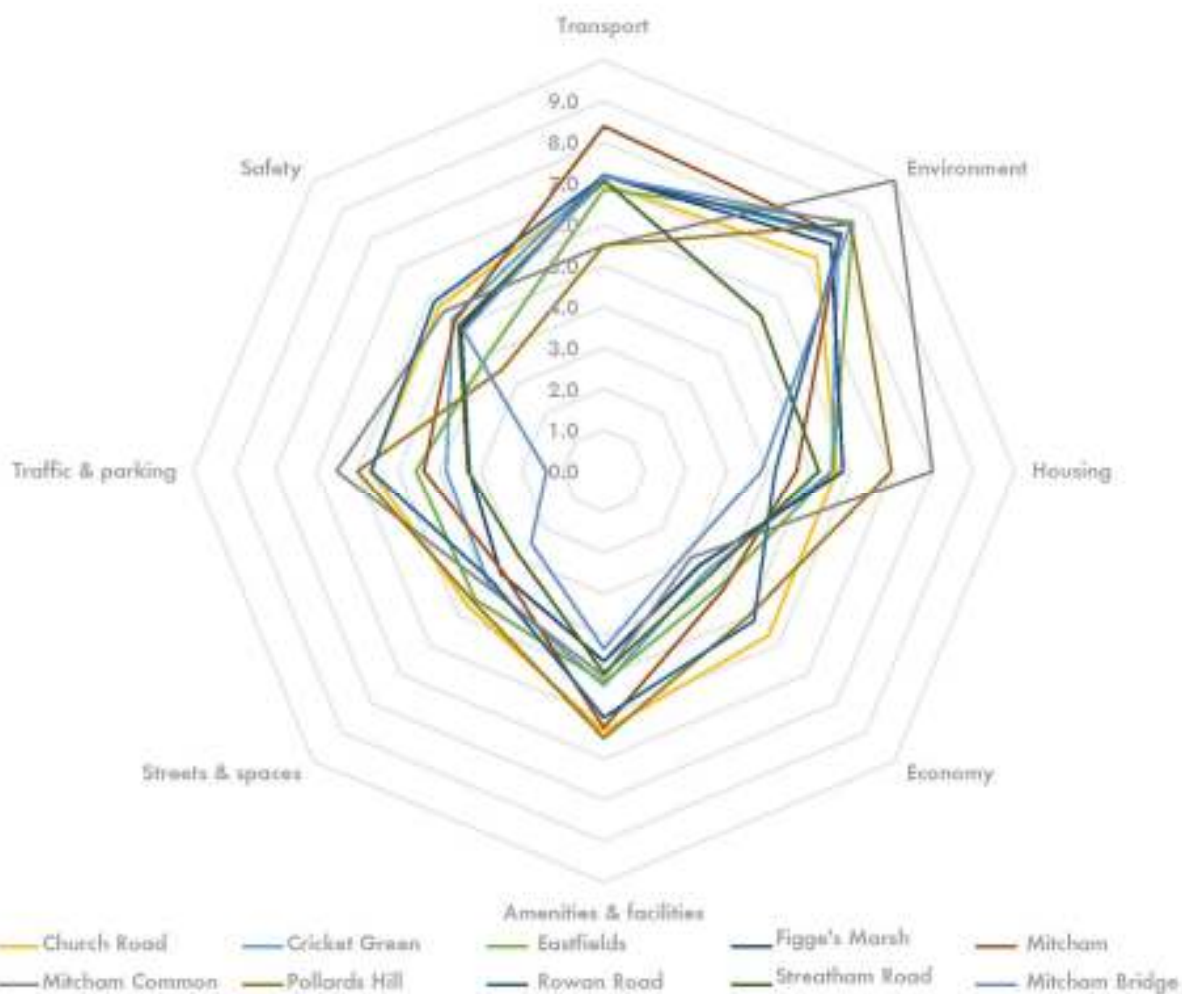


CHAPTER 04. MITCHAM



PLACE PROFILE: MITCHAM

As part of the Borough’s Character Study, 415 Merton residents took part in an online public survey, of which 98 people lived in Mitcham. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform [Merton’s Borough Character Study 2021](#).



Results from residents of Mitcham rating their neighbourhood

KEY OBJECTIVES: MITCHAM

The following objectives provide an overarching vision for Mitcham. More detail can be found in the Policy and Justification sections that follow.



A stronger Mitcham town centre

Improve the environment of Mitcham Town Centre and surrounding areas through high quality design improvements to shop fronts and public spaces and increasing footfall and spend. Improve walking and cycling to and from Mitcham Town Centre.



Supporting community

Mitcham comprises many local parades and open spaces that serve the whole community. Improving Mitcham town centre, local parades, open spaces and the historic environment will help to support communities and reduce inequalities.



Celebrating heritage

Ensuring that development conserves and enhances the historic environment. For example, around Cricket Green, Canons House and Mitcham Common.

CHARACTER: MITCHAM

These photos illustrate the diverse character found across Mitcham.





MITCHAM: POLICY N4.1

Introduction.

Leading the way with providing award-winning sustainable forms of development such as Brenley Park, Rowan Park and the Y:Cube, and with public realm improvements to the Town Centre and the Cannons, the future of Mitcham focusses on improving wellbeing, supporting local economy and creating sustainable neighbourhoods.

The policies are split into two areas, Mitcham Town Centre and the surrounding areas of Mitcham Town Centre.

Mitcham Town Centre

To improve the vitality and overall quality of Mitcham Town Centre, we will:

- a. Increase the footfall and spend in the town centre by improving the quality and diversity of shops and services.
- b. Create healthier streets and spaces that continue to enhance the public realm through high quality streetscape and design improvements using Healthy Streets Approaches.
- c. Improve access to, and movement through, Mitcham town centre by encouraging walking, cycling and public transport that improves links to surrounding neighbourhoods and supports the vision of a 20-minute neighbourhood and improving air quality.
- d. Deliver high quality mixed tenure homes that adds to the vitality of the Town Centre, in particular supporting mixed use developments with homes above shops in the town centre.
- e. Support local and independent businesses, leisure, community and retail outlets that are attractive to and used by the whole community.
- f. Celebrate Mitcham Town Centres unique character by enhancing the setting of heritage assets with high quality design and character led developments.
- g. Improve Mitcham Town Centres unique connection with Mitcham Common, the surrounding green open spaces and public leisure uses.
- h. Champion sustainable design in future developments to contribute to Merton's net-zero carbon target by 2050.

Surrounding area of Mitcham Town Centre

Mitcham is one of Merton's larger neighbourhoods. Beyond the Town Centre, Mitcham has a rich mix of uses and character that span from Phipps Bridge, Figges Marsh, the Cricket Green and Pollards Hill. To improve the overall environment of Mitcham's surrounding areas by providing quality shopping, housing, community facilities and good transport links, we will:

- i. Support North Mitcham Local Centre around Tooting rail station: only supporting development that complements or improves the local or wider public realm.
- j. Improve the quality and mix of homes, including affordable homes.
- k. Ensure that development conserves and enhances the historic environment and green spaces, encouraging greater usage, for example, around Cricket Green, Canons House and Mitcham Common.
- l. Enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to the overall surroundings and connectivity to the town centre.
- m. Support the regeneration at [Eastfields, Ravensbury and](#) Pollards Hill to provide good quality new homes and services and refurbish existing homes in a landscaped setting.
- n. Enhance the connections between Mitcham and surrounding neighbourhoods such as Colliers Wood, Morden and Tooting by improving the public realm and boosting opportunities to walk and cycle through the streets and open spaces around Church Road, Phipps Bridge and Figges Marsh supporting the vision of a 20-minute neighbourhood.
- o. Make more of underused spaces and places around Mitcham, encouraging investment to improve public access and support greater and more diverse usage, particularly for leisure and recreation.
- p. Support and improve the quality of local [Neighbourhood](#) Parades.
- q. Strongly encourage and support sustainable improvements to new and existing developments, in particular to Mitcham's industrial estates and homes.

JUSTIFICATIONSUPPORTING TEXT

- 4.1.1.** The focus for the next 10 years for Mitcham will be to encourage more people to use the town centre for socialising, leisure and shopping. Greater footfall will lead to greater spend, which will help boost local businesses.
- 4.1.2.** Although vacancy rates in Mitcham have generally been low for the past 10 years (lower than average in England and in London), existing businesses report lower spend and therefore less scope to expand, employ more staff, provide new services or refresh their shopfront. In addition, businesses and town centres across the borough need greater trade and more spend to help recover from Covid19.
- 4.1.3.** To boost jobs in Mitcham, the council has been working to make the town centre more attractive and easier to get to and to get around, particularly for people walking, cycling and travelling by public transport. The Mayor and Merton Council's £6million investment in Rediscover Mitcham has transformed the public realm, restored the iconic clock tower, opened the bus lane and helped drive extra footfall to businesses around the Fair Green.
- 4.1.4.** One of the issues identified for the edges of Mitcham town centre is that existing buildings and roads present a barrier to people being able to find their way around the area, particularly by walking and cycling. The 1980s bypass that is now Holborn Way is a clear example, splitting off homes to the west of the town centre from easily accessing it. Other examples include buildings such as Sadler's Close with a built form and site layout that create a physical barrier between the town centre and surrounds. We will require new developments to be laid out to make it easier for people to find their way around and to move around, helping to create attractive streetscape, places to dwell and walking and cycling links to the town centre and through the wider area.
- 4.1.5.** Mitcham town centre has a small proportion of multiple retailers and primarily serves the retail needs of residents living within the east of the borough. The high number of independent retailers and low vacancy rates is one of Mitcham's strengths. However, there are also views of a lack of variety in Mitcham's offer, particularly for people wanting to socialise and the night time economy.
- 4.1.6.** As set out in policies on town centres, many of us visit and use town centres to meet friends and socialise in cafes and restaurants, leisure and entertainment spaces rather than only shopping. Given the pace and scale of change in how we shop and socialise over the last 10 years has been accelerated by Covid19, it is impossible to predict all the changes we

might welcome in the next 10 years. This means that the ground floors of commercial developments need to be flexible to accommodate anything from a soft play area for children to food stalls to flexible offices, while having active, attractive and accessible frontages. The council will support non-residential developments that provide opportunities for people from a wide range of ages, cultures and other characteristics to enjoy.

- 4.1.7.** Mitcham is home to a number of ethnic groups who bring energy and entrepreneurial flair to the community as well as a variety of specialist cultural shops and services which collectively enrich the distinct cultural identities of Mitcham.
- 4.1.8.** Mitcham is located to the east of the borough and is served and connected by rail, tram and bus links; however, the tram stops and train stations are situated at a distance away from the town centre. The council will continue to campaign for increased rail services, particularly at Mitcham Eastfields, and will continue to support the Merton-Sutton Tramlink.
- 4.1.9.** Mitcham is projected to accommodate a range of new homes throughout the plan period. Major development sites include the regeneration of Eastfields and Ravensbury estates. New homes are also proposed at Benedicts Wharf on Hallowfield Way, at Tamworth Lane and a variety of smaller sites across the neighbourhood. In line with the London Plan which prioritises residential development above shops in town centres, the town centre sites will be able to accommodate apartments, providing a contrast to the surrounding terraces and semi-detached houses.
- 4.1.10.** Good quality housing could encourage young professionals into Mitcham bringing increased spending power. More people using the town centre will have knock on social and environmental effects, including greater support for existing local businesses, allowing them to expand and create new jobs. It will also make the centre more attractive to new businesses, providing a wider range of services for residents and workers. Improvements to the business offer, leisure opportunities shops and services will reduce the need for surrounding residents to travel further afield.
- 4.1.11.** To accommodate the significant increase in new housing in Mitcham and the surrounding neighbourhood, in particular from large key development sites, we will also ensure that community services such as education and health meet the needs of existing and new residents. The council has sufficient primary and secondary school places locally and is expanding provision for children with additional needs at Cricket Green School. we will continue to work with the NHS (National Health Service) Clinical Commissioning Group and other partners to protecting and improving the healthcare capacity of the borough currently

serviced by Wilson Clinic.

Surrounding neighbourhoods

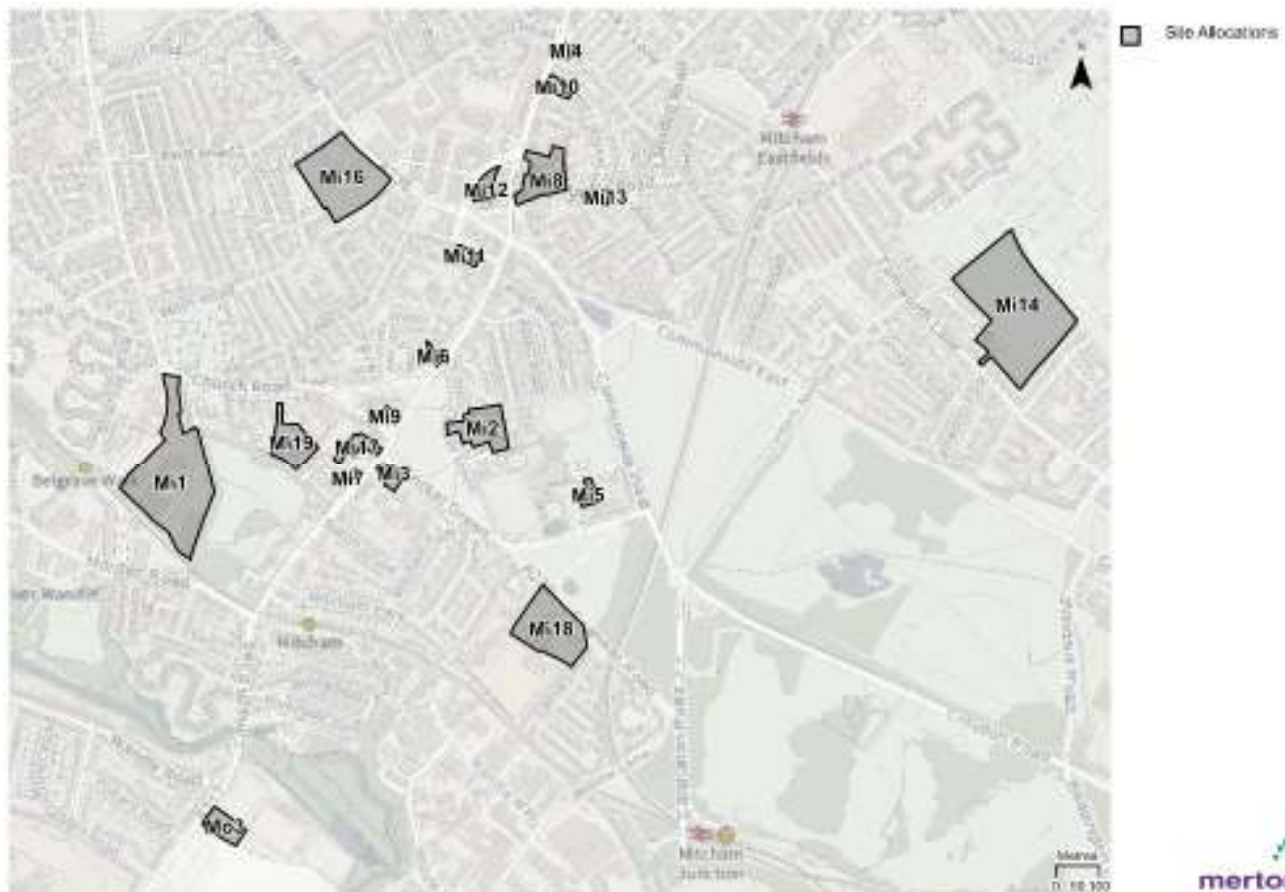
- 4.1.12.** North Mitcham is a reasonably large Local Centre, about 1km north of Mitcham town centre and 1km east of Tooting Broadway underground station. The linear centre has developed around Tooting Rail station at its heart and is bisected by the railway line. It is a key location for residents on the Tooting borders and in the homes surrounding the open spaces at Figges Marsh to avail of shops and services and travel to work. Despite this, the range of shops and the quality of buildings is relatively poor. The council will support proposals that improve the look and feel of the area and provide new services and homes. In particular, the council would support a well-designed redevelopment of the single storey buildings on land lying between Mitcham Road and Links Way to provide homes on upper floors.
- 4.1.13.** Mitcham Cricket Green is an attractive neighbourhood with a wealth of historic assets surrounding Cricket Green, [a site used for cricket for more than 300 years, the oldest continuously played cricket pitch in the country](#). Both historically and today the area has contained a significant number of civic functions, often in purpose-built buildings. There are a number of key sites within or on the borders of Cricket Green that are proposed for redevelopment to provide new homes; these should be laid out to improve legibility and permeability within the area and sensitively designed to complement the heritage assets.
- 4.1.14.** The Canons House and grounds is an attractive historic landscape but has not been well used or much known outside the Mitcham Cricket Green area. The Canons [National Heritage Lottery Fund and National Lottery Community Fund](#) “Parks for People” project is to shine a spotlight on this underplayed and underused landscape. The project [aims to will](#) increase footfall and visibility of the Canons House and Grounds to be a better used asset for Mitcham.
- 4.1.15.** Homes and businesses at Church Road and Phipps Bridge lie between the town centres of Mitcham, Colliers Wood and Morden. Local roads can be congested and there is potential to improve the look and feel of these areas and at the same time improve the experience for walkers and cyclists. Wherever possible developments should support public realm improvements. Large development sites should be permeable to help improve public access for walking and cycling, helping to link the green spaces along the Wandle Trail, between Morden Hall Park, Ravensbury Park, London Road Playing Fields, Cricket Green, The Canons, Mitcham Common through to Rowan Park and Pollards Hill. This will help make it easier for people to get around, whether for work, leisure, or recreation, will have associated wellbeing benefits. Additional footfall could help support local businesses.

-
- 4.1.16.** Like Wimbledon, Mitcham also has a rich sporting environment and recreational opportunities although these are unfortunately less well known. The Canons Running Track, Mitcham Cricket Club, Tooting and Mitcham Hub, the Merton Mile and green gym at Figges Marsh ~~and the grassroots football games on Mitcham Common~~ are just some of the sporting opportunities locally. We will support proposals that provide long term, resilient investment in sports and recreation for the benefit of local communities, opening up private land to public access for sport and recreation, providing local job and training opportunities and supporting all of Mitcham's diverse communities.
- 4.1.17.** The London Plan 2021 identifies Mitcham as an area with potential for housing growth. Merton's Borough Character Study 2021 analyses the existing character of Mitcham's neighbourhoods, which are generally lower density and low rise. We will continue to support the development of new homes and associated infrastructure in Mitcham in site allocations, in incremental development and via estate regeneration. Merton's Estates Local Plan 2018 guides the regeneration of Eastfields and Ravensbury estates, which are underway and will provide a substantial number of new homes and considerably improve the housing stock over the next 15 years. Regeneration plans have also been developed for Pollards Hill to provide new homes to the south east of the borough.

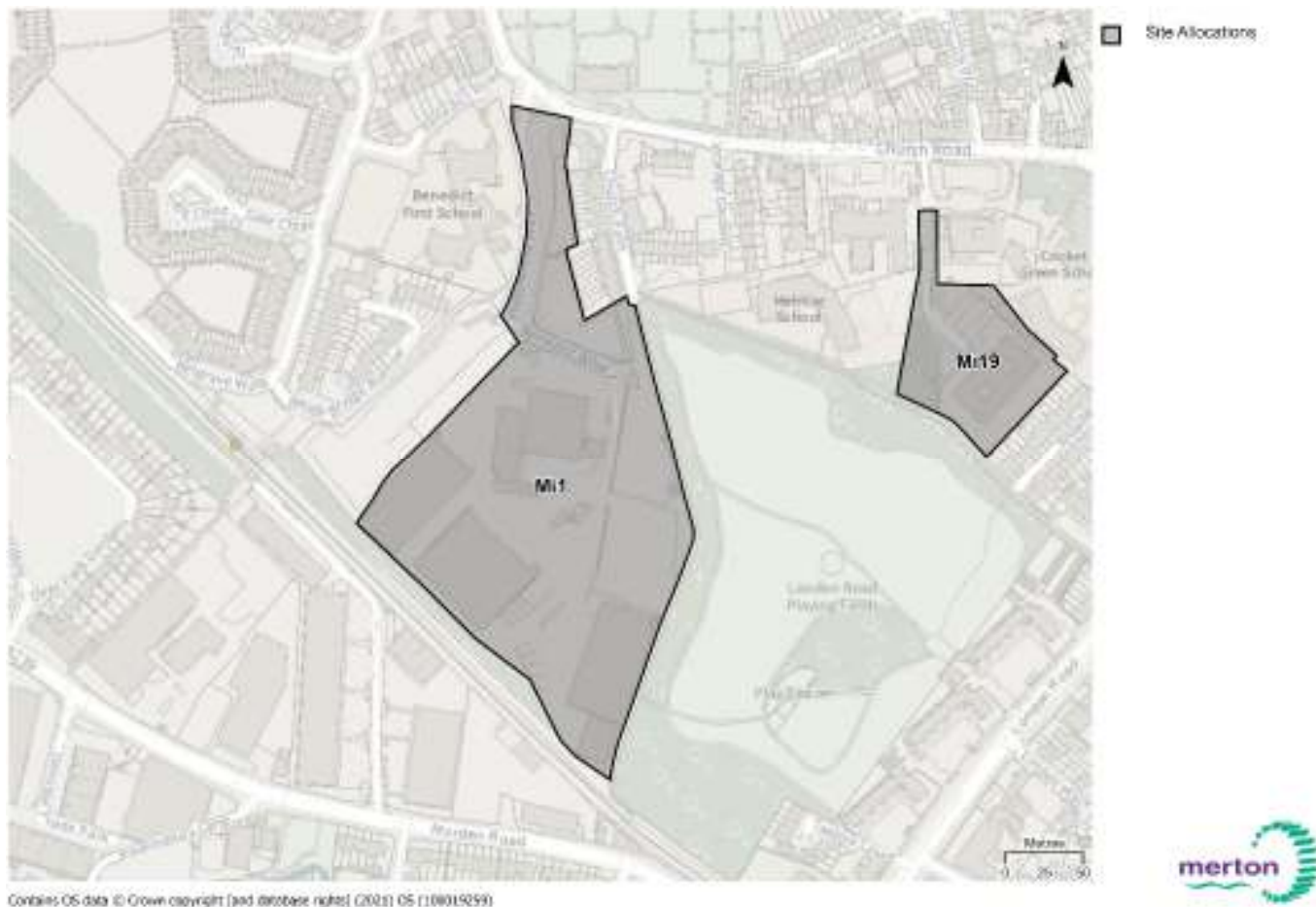
Site Allocations

Site allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocations will be determined against planning polices (including the London Plan).



Contains OS data © Crown copyright (and database rights) (2021) OS (100019299)

SITE Mi1: Benedict Wharf, Hallowfield Way, Mitcham, CR4 3BT

Ward: Cricket Green

Site description: Most of the site is used for waste management purposes by the owner occupier Suez. A small part of the site (rectangle in the north-western corner) is owned by Cappagh and is used as the car pound for Wandsworth and Lambeth traffic enforcement.

The single operational site entrance is from the north down a short wide single access road, Hallowfield Way, off Church Road. Vehicles entering the site must pass Benedict Primary school, St Peter and St Paul's church and graveyard and residential properties, all of which are found at the junction of Hallowfield Way and Church Road. There is also a secondary road access down Church Path, a narrow residential street lined with historic two-storey cottages, but this is currently closed off by Suez while the site is in waste management use.

To the north of the site, beyond Cappagh's car pound boundary, lies White Bridge Avenue, a residential road and Benedict Primary School. Morden Hall Park, a historic park owned by the National Trust, lies circa 200m to the north **west east** of the site boundary. To the **west east** of the site boundary lies Baron Walk, a fenced off path and beyond lies London Road playing fields.

The Wimbledon-Croydon tramline lies adjacent to the southwestern boundary of the site. Belgrave Walk tram stop is within 5 minutes' walk (300m) of the site's northeast corner with services between Wimbledon and Croydon; At the other side of the tramline are large industrial sheds.

Large electricity pylons lie just beyond the site boundary, with electricity wires running circa 30 metres above ground parallel with the tram tracks.

Site owner: Suez (site 3.8ha), Cappagh (site 0.6 ha), to the north of the site is a strip of land owned by the London Borough of Merton.

Site area: 4.4 hectares (main Suez owned site 3.8ha; rectangular Cappagh site 0.6 hectares)

Existing uses: Waste facility with planning permission for expansion (majority of site); car pound for Wandsworth and Lambeth councils (rectangular northern part of site)

Site allocation: Residential with some non-residential uses that are commensurate with a residential setting (for example small workshops, community uses etc.) and deliverable. Reallocation is dependent on there being no loss of waste management capacity within the South London Waste Plan area.

Merton Council will only support reallocation where the waste management capacity and function are moved within the South London Waste Plan area.

Development of the site is an opportunity to provide much needed new homes and other compatible uses in a largely residential setting with surrounding infrastructure and minimise HGV (Heavy Goods Vehicle) and other heavy traffic and attributed to the waste management use of the site and minimise the associated road-based noise and air pollution.

Site deliverability: 5- 10 years.

Indicative site capacity (new homes): 650-850 new homes.

Further information: The site is safeguarded as an existing waste management site in Schedule 1 of the adopted (2012) [South London Waste Plan unless](#) replacement compensatory provision is provided.

Suez has acquired a site in Sutton, a South London Waste Plan partner borough, and has secured planning permission for a replacement waste management facility that will exceed the required replacement compensatory provision.

The [draft South London Waste Plan 2021-2036-2022-2037](#), which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and has been submitted to the Secretary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.

On 18 June 2020, Merton's Planning Applications Committee resolved to refuse outline planning permission ([19/P2383](#)) for the development of 850 dwellings and 750sqm of commercial floor space on the site. On 3 August 2020, the Mayor of London decided to take over the application for determination and on 8th December 2020 the Deputy Mayor of London resolved to approve the application subject to the completion of a Section 106 agreement. This is due to be completed in 2021.

Design and accessibility guidance:

Development proposals for any use would be required to address the national and local planning policies relating to heritage assets, environmental protection and nearby sensitive development. In this case, the council supports the removal of SIL capacity from this site to elsewhere in the South London Waste Plan area as the proximity of so many sensitive land uses, directly adjacent or near the site is not compatible with viable long-term strategic industrial development. Decontamination will be required due to the site's historic uses.

The overhead power lines supported by electricity pylons influence the layout, scale, massing and potential uses of new development on parts of the site.

Development proposals must mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Development proposals must protect the amenity of the adjacent properties, including the nearby homes

and schools.

The site must provide sustainable drainage measures throughout the development.

Neighbourhood and heritage considerations

Development proposals must enhance the design and streetscape in the setting of the Wandle Valley Regional Park and Mitcham Cricket Green conservation area.

Development proposal must provide public realm improvements along Hallowfield Way, reducing the width and improving the frontage, enhancing the setting of the Grade II* St Peter and St Paul's Church and Benedict Primary school, thus delivering some of the actions from the Mitcham Cricket Green conservation area character appraisal and action plan.

Development proposals must preserve and enhance and not cause significant harm to heritage assets including the character of Mitcham Cricket Green Conservation area, the nationally and locally listed buildings and the historic park and garden.

Development proposals must be sensitive to the following:

- Benedict Primary School lies opposite the church adjoining the site entrance at Hallowfield Way. Melrose School (for secondary school aged children with social, emotional and behavioural difficulties) and Cricket Green School (a special educational needs school for 4-19-year-olds) are both within 300m of the site, adjacent the London Road playing fields.
- Residential streets within 100m of the site include Church Path, White Bridge Avenue, Belgrave Walk and the nearby Cherry Trees estate.
- Respect and not cause significant harm to heritage assets including the character of Mitcham Cricket Green Conservation area, the nationally and locally listed buildings and the historic park and garden.

Improving walking, cycling and access:

Development proposals must improve public access through the area and increase permeability, including via Baron Walk and between London Road playing fields and the site.

The site is bounded by Baron Walk to the east and Ravensbury Path to the west (both Public Rights of Way) that provides access to Belgrave Walk Tram stop and over the tram tracks to Morden Road. Development proposals must fully protect and enhance these routes and maximise the permeability of the site for pedestrians and cyclists by providing and contributing to new routes and connections including into London Road playing fields.

Development proposals must support walking and cycling links between the green spaces at Morden Hall Park, London Road Playing Fields and enhance the Wandle Valley Regional Park.

Infrastructure requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal, including contributing to access improvements with London Road Playing Fields. ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~](#)

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Development proposals must consider the existing Wimbledon-Croydon tramline on the western

boundary of the site, mitigation of any safety and security impacts and improve access from the site to the tram stop.

The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.

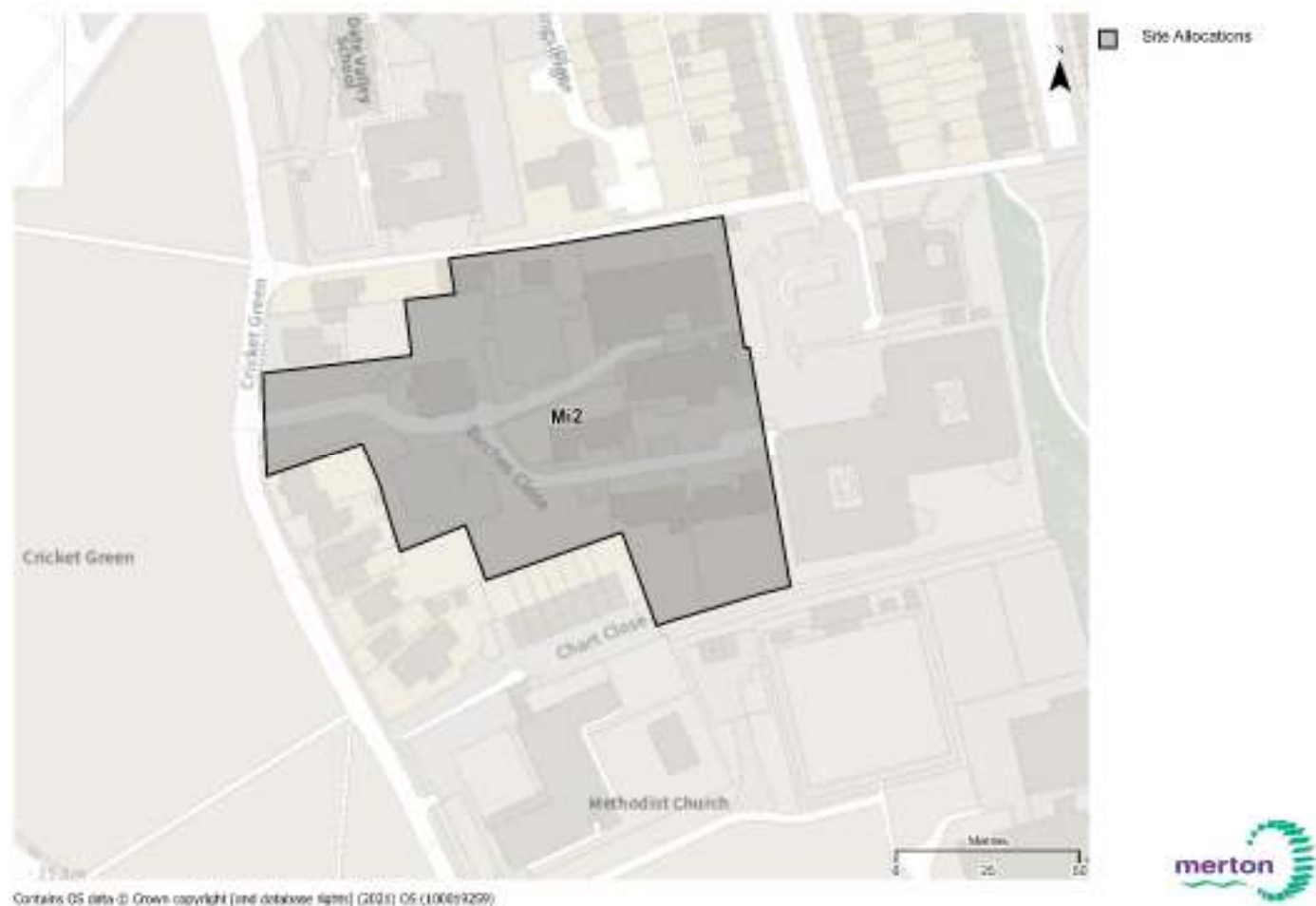
The scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure and sewage treatment infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> Merton Council will engage with and seek advice from Thames Water about any development proposals on this site.

The site is adjacent to tram tracks, the developer must consult with London Trams. The council will require evidence of engagement with London Trams with any submitted planning application. Merton Council will also consult with and seek advice from London Trams about the development of this site.

Electricity cables, supported by two pylons just beyond the site boundaries, run parallel with the tramlines. This is National Grid infrastructure in the form of YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid’s overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer engage with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of engagement with National Grid with any submitted planning application.

The site location	
Approach to tall buildings	The size of the site allows for a masterplanned approach which could contain taller buildings <u>of up to 10 storeys subject to consideration of design policies</u> .
Impacts on Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is susceptible to surface flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	The site is within the Wandle Valley Regional Park and is adjacent to London Road Playing Fields, designated as open space.
Impacts on ecology designations.	London Road Playing Fields running along the entire eastern side of the site, is designated as a Site of Importance for Nature Conservation and as a green corridor for wildlife protection. Nearby Morden Hall Park is designated as Metropolitan Open Land, a Site for Importance for Nature Conservation, as green corridor.
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mi2: Birches Close, Mitcham, CR4



Contains OS data © Crown copyright (and database rights) (2013) OS (100019299)

Ward: Cricket Green
Site description: The site, which takes access from Cricket Green, consists of various single and two-storey buildings accommodating specialist NHS clinics and supported accommodation units. To the north, on the opposite side of the Cold Blows footpath is a three-storey former office since converted into flats and three-storey blocks of flats. To the east of the site is a single storey nursing home and to the south is a bowling green, the Methodist Church and a row of two-storey terrace houses. To the west is a row of two and three-storey detached and semi-detached houses.
Site owner: National Health NHS Property Service (NHSPS)
Site area: 0.97ha
Existing uses: Healthcare
Site allocation: Healthcare with community and enabling residential development or residential if the existing services are relocated within an alternative healthcare facility in Mitcham.
Site deliverability: Delivery: 5-10 years
Indicative site capacity (new homes): 35-54 new homes
Design and accessibility guidance: Opportunities arising from the site size and location for exemplary urban design either delivering either healthcare or sustainable homes, complimenting the heritage assets and historic character of the area, while protecting the residential amenity or the adjacent properties. Development proposals must improve walking and cycling links to, from and around the site. Access to

the nearby green spaces and heritage assets should be promoted through a development proposal.

Development proposals must preserve and enhance the Cold Blows footpath along the northern boundary.

Investigating the potential impact of any proposed development on archaeological heritage. Locally listed Birches House to be retained as part of any development proposal.

Development proposals must improve the connectivity of the site - ensuring the layout of buildings and spaces within the site provides accessibility to London Road and the town centre and The Canons House and its grounds.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area.

Infrastructure requirements

To ensure that healthcare provision is delivered in this area and that there is no loss of potential NHS sites until this happens, the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital or Birches Close sites.

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.](#)

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes, The White House, 'Cricket Green, and 'Chestnut Cottage', Cricket Green, both Grade II listed buildings, are to be preserved. The Birches (a.k.a. 'Birches House') is a Locally Listed building.
Impacts a Conservation Area	Yes
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impact from flooding from all sources	Portions of the north, east and west of the site are within a Critical Drainage Area.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes. The site is within the Wandle Valley Regional Park 400m buffer. Opposite the site is Metropolitan Open Land

	and Mitcham Cricket Green Open Space which also forms part of the Wandle Valley Regional Park.
Impacts on ecology designation.	Yes. Mitcham Cricket Green is a Green Corridor.
Public Transport Accessibility Level (PTAL)	PTAL 4, good access to public transport.

SITE Mi3: Burn Bullock and Mitcham Cricket Pavilion 315 London Road, Mitcham, CR4 4LA.



© Crown Copyright (and database rights) (2011) OS (100015699)

Ward: Cricket Green
Site description: The site is occupied by two distinct uses. On the junction of London Road and Cricket Green sits the two storey Burn Bullock public house (currently closed) with associated car park. On the part of the site that faces Cricket Green is a two-storey red brick and wood building, currently in use as a Cricket Pavilion serving the cricket club on Cricket Green.
The site faces the open space at Mitcham Cricket Green to the northeast. The adjacent property to the Burn Bullock fronting London Road to the west is the three storey Jobcentre Plus. Next to the Cricket Pavilion on Cricket Green is a two-storey dwelling house.
The cricket pavilion opened in 1904 built around 1920 and the associated land and building is the only dedicated facility supporting the playing of cricket on Mitcham Cricket Green.
Mitcham Cricket Green is recognised as one of the oldest cricket grounds in the world where cricket has been consistently played since at least 1685.
Site owner: Private ownership - (Site allocation suggested by Mitcham Cricket Green Community and Heritage)
Site area: 0.24ha
Existing uses: Public house (currently closed) car park, cricket pavilion.

Site allocation: Secure community ownership and management of the land and buildings associated with Mitcham Cricket Pavilion and restoration of the Burn Bullock supported by enabling development.

Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green.

Use of the Burn Bullock building ~~as~~ in non-residential uses with public access on the ground floor which could include business, service or community uses. Residential development may be acceptable on upper floors as enabling development.

Residential development on the car park to the rear of the site to enable community ownership and management of Mitcham Cricket Pavilion associated land and buildings.

Site deliverability: 5-10 years.

Indicative site capacity (new homes): 5-12 new homes - on parts of the site not including the Cricket Pavilion, storage shed and lower floor of the Burn Bullock.

Design and accessibility guidance:

The cricket pavilion is registered as an Asset of Community Value.

The council is looking to secure the long-term future community ownership and management of the land and buildings associated with Mitcham Cricket Pavilion to help the continuation of cricket being played on the Green. This would be helped by enabling development on the former car park within the site.

Opportunity to secure ownership and improvements to Mitcham Cricket Pavilion directly associated with the active operation of cricket playing on the historic town green at Mitcham Cricket Green.

Development of the site is an opportunity for enabling development to support restoration of Burn Bullock.

Opportunity to bring an underused site at the Burn Bullock back into use.

Opportunity to secure long term community ownership and management of the land and buildings associated with Mitcham Cricket Pavilion and restoration of the Burn Bullock supported by enabling development.

Development proposals will be required to secure the restoration of the listed Burn Bullock public house and its removal from the “Heritage at Risk” register.

Development appropriate to the residential setting that supports public access to the ground floor of the Grade II listed Burn Bullock would be supported.

Development on the car park to the rear of the site to enable community ownership and management of Mitcham Cricket Pavilion associated land and buildings. Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green.

Development proposals must be delicately designed to conserve and enhance the significance of the heritage assets and the views from Metropolitan Open Land.

Infrastructure requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and Playing Pitch Strategy 2019 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~

Development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek advice from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	<p>Burn Bullock Public House is a Grade II listed building and is on the national “Heritage at Risk” list.</p> <p>The cricket pavilion is locally listed.</p> <p>Other historic assets in the vicinity of the site include the White Hart (Grade II listed), drinking fountain & horse trough (Grade II listed), 346-348 London Road (Grade II listed).</p> <p>The cricket pavilion opened in 1904 built around 1920, and associated land / building is the only dedicated facility supporting cricket playing on Mitcham Cricket Green.</p> <p>The cricket pavilion is registered as an Asset of Community Value.</p>
Impacts a Conservation Area	Yes
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes. The site is within the 400m buffer of Wandle Valley Regional Park. Registered town green hosting an operational cricket pitch. Mitcham Cricket Green is Metropolitan Open Land, designed Open Space and within the Wandle Valley Regional Park.
Impacts on ecology designation.	Yes. Mitcham Cricket Green is a Green Corridor.
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mi4: Elm Nursery Car Park 210 London Road, Mitcham, CR4 3TA



Ward: Figges Marsh
Site description: This site is a publicly accessible surface car park. Adjacent the northern boundary is a single storey commercial unit; a public access footpath lies between the commercial unit and the car park. Adjacent the southern boundary are flats ranging from three to five storeys to the west (on the opposite side of London Road) are four storey flats and to the east are two storey terraced houses. The site is not within the Mitcham town centre boundary. The site is accessed from London Road with pedestrian access also to Feltham Road.
Site owner: Merton Council
Site area: 0.1ha
Existing uses: Car Park
Site allocation: Residential
Site deliverability: 0-5 years
Indicative site capacity (new homes): 10-21 new homes.
Design and accessibility guidance: On 16 th July 2020 planning permission (19/P4047) was resolved to be granted for residential development on this site subject to the completion of any enabling agreement and conditions. Development of the site is an opportunity to deliver new homes in an accessible setting and to provided connections to the streets lying to the east of the site. Development proposals must mitigate potential parking, traffic and road safety impact on neighbouring streets and local amenity.

Development proposals must protect the residential amenity of those properties adjacent to or in the vicinity of the site.

The public access footpath should be protected and enhanced.

Infrastructure requirements:

The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

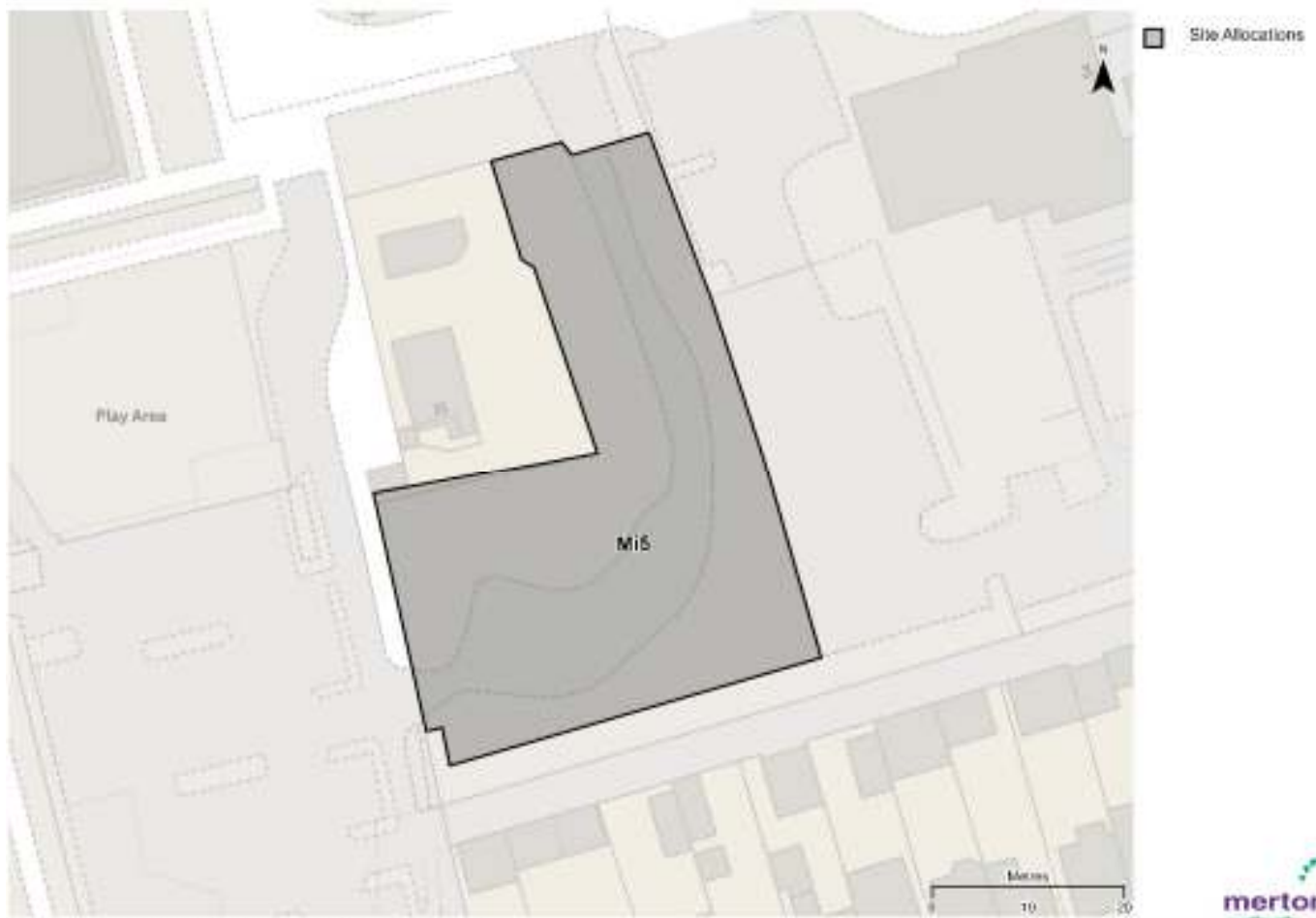
This site is located in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan.~~

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, Area is susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 4, good access to public transport.

SITE Mi5: Land at Canons Madeira Road, Mitcham, CR4 4HD



Contains OS data © Crown copyright (and database rights) (2021) OS (100002599)

Ward: Cricket Green

Site description:

The site is vacant, vegetated land surrounding a residential dwelling set back circa 50 metres from the public highway and not visible from it. A high wall surrounds much of the site to the west, with boundary fencing on all other sides.

To the west of the site is the car park associated with Canons Leisure Centre, Canons House and its grounds. To the northwest of the site is Canons Leisure Centre. Canons Recreation Ground, including a children’s playground is visible to the northern boundary of the site. To the east of the site is a restaurant behind residential properties, which front Commonsides West. Beyond that is Mitcham Common.

The rear gardens of semi-detached properties fronting Madeira Road bound the site to the south.

Site owner: Merton Council

Site area: 0.16ha

Existing uses: Vacant

Site allocation: Residential

Site deliverability: 0-5 years.

Indicative site capacity (new homes): 5-12 new homes

Design and accessibility guidance:

On 16th July 2020 planning permission (19/P4050) was resolved to be granted for residential development on this site subject to the completion of any enabling agreement and conditions.

Development proposals need to be sympathetic to the historic setting, particularly of Canons House and the views from the nearby Metropolitan Open Land [and have regard to The Canons Conservation Area Management Plan](#).

Development proposals must protect the amenity of adjacent residential occupiers.

Access to the site is limited to the existing access from the north of the site via Commonsides West and in front of Park Place.

Infrastructure Requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020](#).

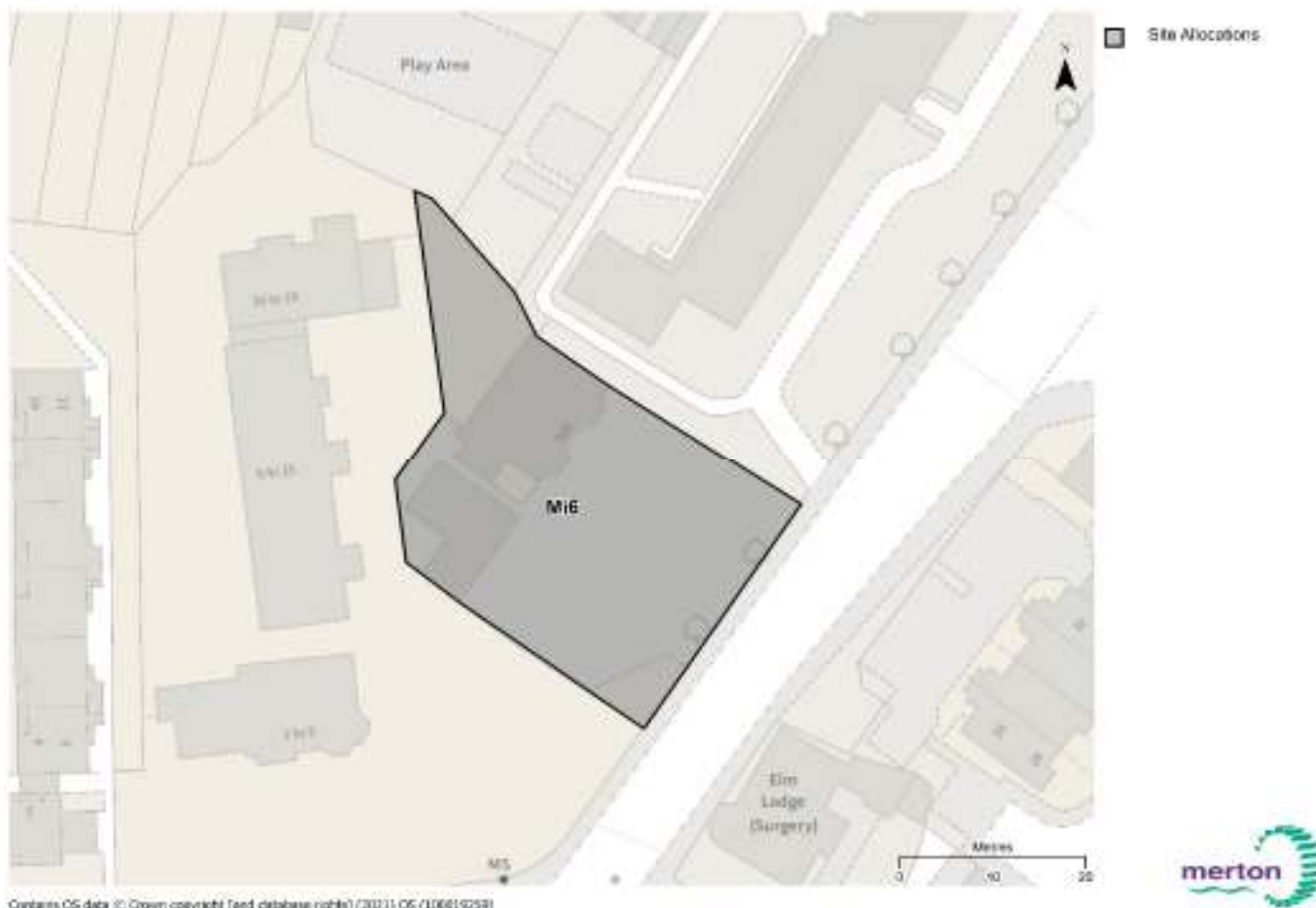
Development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes, historic assets within the surrounding area include the Grade II* listed Canons House, the adjacent Grade II* listed wall and the Grade II listed Dovecote.
Impacts a Conservation Area	Yes
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, Canon Recreation Ground and the site is within Wandle Valley Regional Park.
Impacts on ecology designation.	Metropolitan Open Land, Site of Importance for Nature Conservation and several Green Corridors close to the site.
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

SITE Mi6: 326 and 328 London Road, Mitcham CR4



Ward: Cricket Green
Site description: At 326 London Road is a three-storey double fronted Victorian building with parking spaces in front and a garden to the rear. The neighbouring 328 London Road is a single storey, pitch roofed, office building with parking spaces in front. Both buildings are set back from the road and have significant natural barriers from large trees on the London Road boundary. The area is characterised by mansion blocks of apartments such as Glebe Court. The site is currently in use as Mitcham Citizens Advice Bureau and community meeting space.
Site owner: Merton Council
Site area: 0.13ha.
Existing uses: Offices (Mitcham Citizens Advice Bureau (CAB) and community meeting space
Site allocation: Residential if, the office and community functions are provided elsewhere locally. Residential use would be dependent on the office and community use being re-provided locally.
Site deliverability: 5-10 years
Indicative site capacity (new homes): 5-12 new homes
Design and accessibility guidance:

Site provides an opportunity to provide new homes sensitive to the local heritage assets.

Development proposals must recognise the site’s close proximity to Grade II Elm Lodge and structures, Grade II milestone and heritage assets near the site and must consider the setting of heritage assets. [326 London Road was added to Merton’s Local List in 2020.](#)

Development proposals must enhance the frontage on London Road, respecting the character of this part of the conservation area and the setting of the listed buildings and protect the residential amenity of the adjacent properties.

Infrastructure requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan.~~

Development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Yes. Grade II Elm Lodge and structures, Grade II milestone. 326 London Road was added to Merton’s Local List in 2020.
Impacts a Conservation Area	Yes.
Impacts on Archaeological Priority Area	Yes. Mitcham Village Archaeological Priority Zone Area (APZA) Tier 2
Impacts a Scheduled Ancient Monument	No.
Impacts on flooding from all sources.	No.
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Site adjacent to open space
Impacts on ecology designation.	Site of Interest for Nature Conservation (SINC) and green corridors.
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport, however 5 – 8 minutes’ walk to the town centre.

SITE Mi7: 370 London Road Mitcham, Mitcham, CR4 3ND



Contains OS data © Crown copyright [and database rights] (2021) OS (100019239)



Ward: Cricket Green
Site description: Area of vacant land facing London Road, currently used as outdoor car wash. Parade of shops with flats above adjacent to the southwest of the site and residential street with two-storey houses to the north of the site
Site owner: Private owner
Site area: 0.04ha
Existing uses: Outdoor car wash
Site allocation: Mixed used non-residential (shops, services, offices, community on the ground floor and residential on upper floors).
Site deliverability: The site was not proposed by the landowner, which could delay the delivery of the site).
Indicative site capacity (new homes): 5 -8 new homes
Design and accessibility guidance: To provide new homes sensitive to the heritage assets and historic setting and character. Development proposal will need to enhance the frontage on London Road, while enhancing the character of this part of the conservation area and the setting of the listed buildings.

Development proposal will need to protect the residential amenity of the adjacent properties.

Positive use of empty site with active frontage to London Road strengthening and extending local retail parade. Height to be guided by context of buildings over shops running along London Road to south west and the proposed development at 360-364 London Road. Opportunity for small site provision of new homes.

Infrastructure requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan.~~

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

There is a bus stop fronting the site which should be protected or appropriately relocated in discussion with Transport for London.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Adjacent to designated open space, setting of listed building (Grade II Elm Lodge) and structures (Grade II milestone)
Impacts a Conservation Area	Yes, the Mitcham Cricket Green Conservation Area
Impacts on Archaeological Priority Area	Yes. Mitcham Village Archaeological Priority ZoneArea (APZA) Tier 2 The site is in an archaeological priority area and within the Wandle Valley Regional Park boundary.
Impacts a Scheduled Ancient Monument	No
In a Flood Zone	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts ecological designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 3 moderate access to public transport however, within 5 minutes' walk of Mitcham town centre.

SITE Mi8: 1 to 12 Majestic Way, Mitcham, CR4 2JS.

Ward: Figges Marsh

Site description: The site lies within Mitcham town centre and consists of a series of 11 purpose built commercial with their main frontage onto Majestic Way and access for deliveries from St Mark's Road to the rear.

These units include Poundland, Lloyds bank, Scope and the largest of these is Morrison's supermarket.

A multi-storey car park accessed from St Mark's Road is leased to Merton Council. A part of the site currently used as the ramp for access to the multi storey car park lies to the north of St Mark's Road.

The site has road frontage on three sides but currently only active shop frontage on Majestic Way aside from Unit 1 which has dual aspect frontage onto Majestic Way and London Road bus lane.

The site is 8 - 10-minute walk to Mitcham Eastfields station and trains to London Victoria and Blackfriars, Sutton and Epsom.

The landowner says that the existing retail accommodation is let on short leases. The multi storey car park is let to Merton Council. During construction, a significant and prominent element of commercial floorspace at the heart of Mitcham town centre would not be available.

Site owner: [Appley-Centrica Combined Common Investment Fund](#)

Site area: 1ha
Existing uses: Mixed uses: residential, retail, office community and car park.
Site allocation: Mixed use: Town Centre Type Uses including retail, businesses, food and drink, leisure and community services (health centres, crèches, day nurseries, day centre) on the ground floors, residential on upper floors.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 60 -160 new homes
<p>Design and accessibility guidance: The site provides an opportunity to modernise and revitalise the town centre by supplying new homes and increase business floorspace in an accessible area.</p> <p>Proposal must contribute to the increasing the footfall, the local economy and support the vitality and sustainability of Mitcham town centre.</p> <p>Mitigation measures are needed during the construction phase to minimise disruption to Mitcham Fair Green, London Road bus lane Mitcham market, St Mark's Road and nearby school and the surrounding businesses.</p> <p>Development proposals design and building must make an attractive and significant contribution to improving the look and feel of the whole town centre and Fair Green. In addition, be sensitive to Mitcham town centre landmark namely the clock tower.</p> <p>Development proposals must provide an active frontage along St Marks's Road, adding vitality and safety of the area.</p> <p>Development must give careful consideration to the impact on all transport modes in the surrounding area. The development should be designed in accordance with the Healthy Streets Approach and should enhance active travel and public transport connections in the area. During the construction phase for this site negative transport, delivery and servicing impacts should be minimised and mitigated, giving priority to active modes and bus operations.</p> <p>Development may be required to include a secure cycle storage facility (hub) for wider public access.</p> <p>The site is adjacent to the London Road bus lane, any negative impacts on bus operations, including during construction, should be minimised and mitigation provided.</p>
<p>Infrastructure Requirements:</p> <p>Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan.</p> <p>Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.</p> <p>This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.</p> <p>The developer should contact SGN to discuss requirements for any improvements to the gas</p>

infrastructure network.

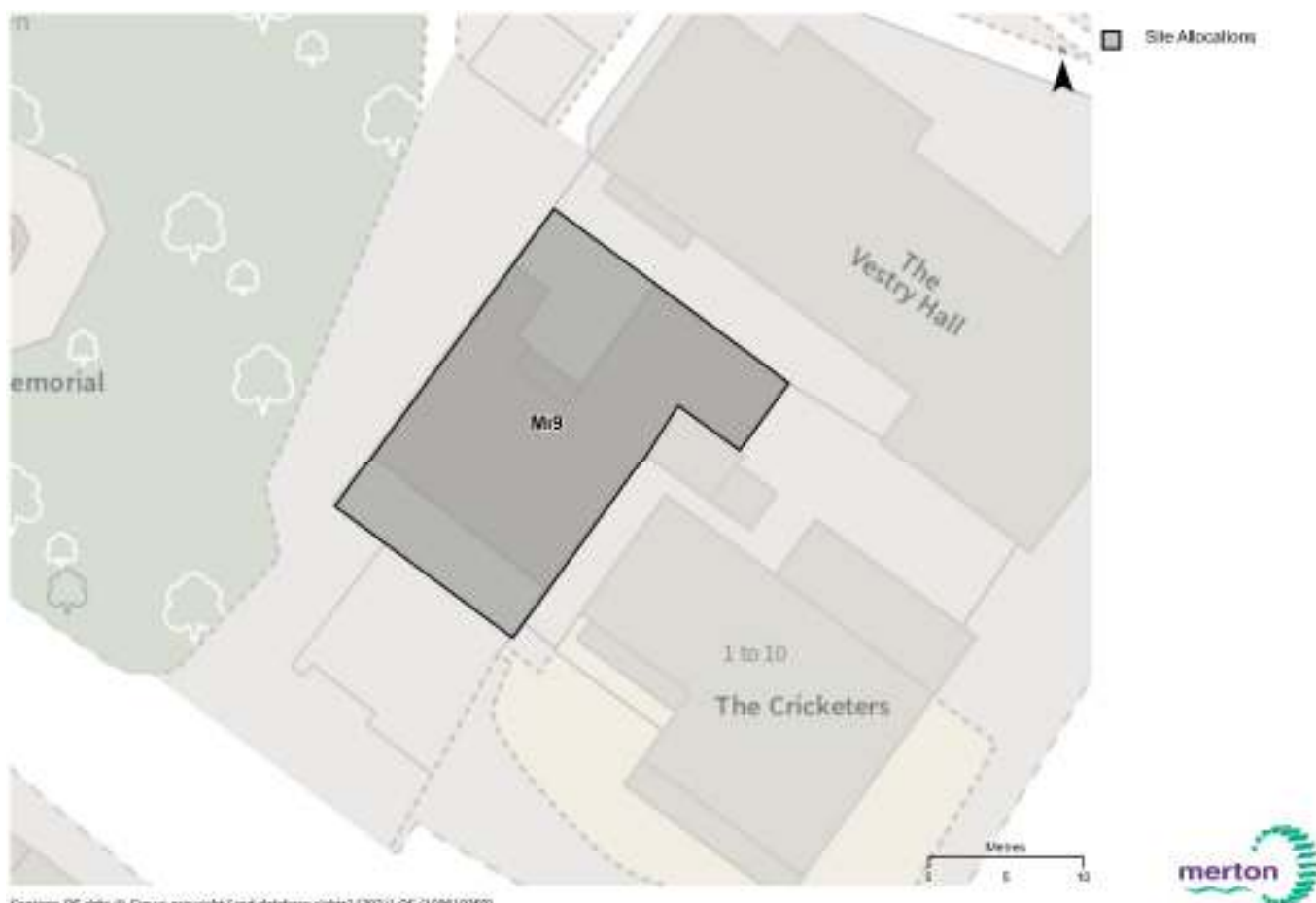
Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

Thames Water does not envisage infrastructure concerns about the ~~water supply network infrastructure~~, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	The clock tower on Fair Green Grade II listed.
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	Yes, two <u>Mitcham</u> Archaeological Priority Zones <u>Area Tier 2</u>
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	Yes
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, within the Wandle Valley Regional Park and designated open space to the north of the site.
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access to public transport.

SITE Mi9: Former Mitcham Fire Station 30 Lower Green West, Mitcham, CR4 3AF.



Contains OS data © Crown copyright (and database rights) (2021) OS (100019359)

Ward: Cricket Green

Site description: This site is a 2-3 storey building (fire station) set in a group of buildings, including 3-4 storey Vestry Hall next to the rear of the site (northeast) and the new homes on the former Cricketers pub site, which is currently being redeveloped, next to the adjacent southeast of the site. Next to the northwest of the site is triangular open space known as Lower Green. The site fronts Lower Green Road. Cricket Green (recreational open space) lies to the southeast of the group of buildings, across London Road from Vestry Hall and is close to a Grade II listed war memorial.

On 25th November 2021 planning permission was granted for nine homes (reference 20/P0801)

Site owner: London Fire Brigade

Site area: 0.04ha

Existing uses: Former fire station

Site allocation: A mix of uses which could include any of the following: community uses (Clinics, health centres, crèches, day nurseries, day centre), other community uses such as a cinema, gallery, theatre; residential, restaurant/café, office, drinking establishment or non-food retail.

Site deliverability: 0-5 years

Indicative site capacity (new homes): 1-4 new homes.

Design and accessibility guidance:

Any redevelopment or change of use should keep the building and design should be sensitive to its

form and function. Recognise physical and functional relationship with neighbouring Vestry Hall.

Mitcham Cricket Green Conservation Area Character Assessment and management plan should also inform any design considerations. The size, layout and location of the building would merit its consideration for community uses, subject to delivery.

Mitigate potential parking, traffic and road safety impacts on neighbouring street and local amenity. Investigating the potential impact of any proposed development on archaeological heritage.

Development should improve the cycle and pedestrian connections to this island site, which could be through enhancing access to Public Right of Way 187 to the rear of Vestry Hall.

Infrastructure Requirements

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Yes, Mitcham Parish Rooms, to the west of the site is a Grade II statutory listed building. The war memorial adjacent the site and the Burn Bullock public house across the junction to the south of the site is Grade II listed.
Impacts a Conservation Area	Yes.
Impacts on Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No.
Impacts flooding from all sources.	Yes, area is susceptible to surface water flooding.
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Yes.
Impacts on ecology designation.	Yes, the triangular open space to the northeast of the site is designated as Metropolitan Open Land, Green Corridor and Green Chain
Public Transport Accessibility Level (PTAL)	PTAL 4 good access to public transport.

SITE Mi10: Mitcham Library, London Road, Mitcham, CR4 2YR



Contains OS data © Crown copyright [and database rights] (2011) OS (100019259)

Ward: Figges Marsh
Site description: This site holds a two-storey library and community facility with a car park found to the east of the building. The site is surrounded by buildings ranging between two and five storeys in height that consist of blocks of flats and retail parades. The site fronts London Road.
Site owner: Merton Council
Site area: 0.18ha
Existing uses: Library
Site allocation: Library to be kept and improved (either on site or closer to Mitcham town centre). The rest of the site considered for a suitable mix or any of community uses, office or residential.
Site deliverability: 5-10 years
Indicative site capacity (new homes): 20-30 new homes
Design and accessibility guidance: A library to be kept either on site or closer to Mitcham town centre. If residential elements are considered, these should be found on upper floors or set back from the frontage with London Road. Access to a library and the services it provides, for the local community is an important asset

which helps to address, income, education and training inequalities.

Development must increase the customer service area to increase Mitcham library facility and service, provide more adaptable and suitable modern space for the local community.

Development proposals must respect the character of the locally listed building.

Development proposals must mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Investigation of the potential impact of any proposed development on archaeological heritage must be carried out.

Development proposals must incorporate sustainable drainage measure within the design and layout.

Infrastructure Requirements

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan.~~

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

This site is located in an area identified as being deficient in access to public open space. The council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

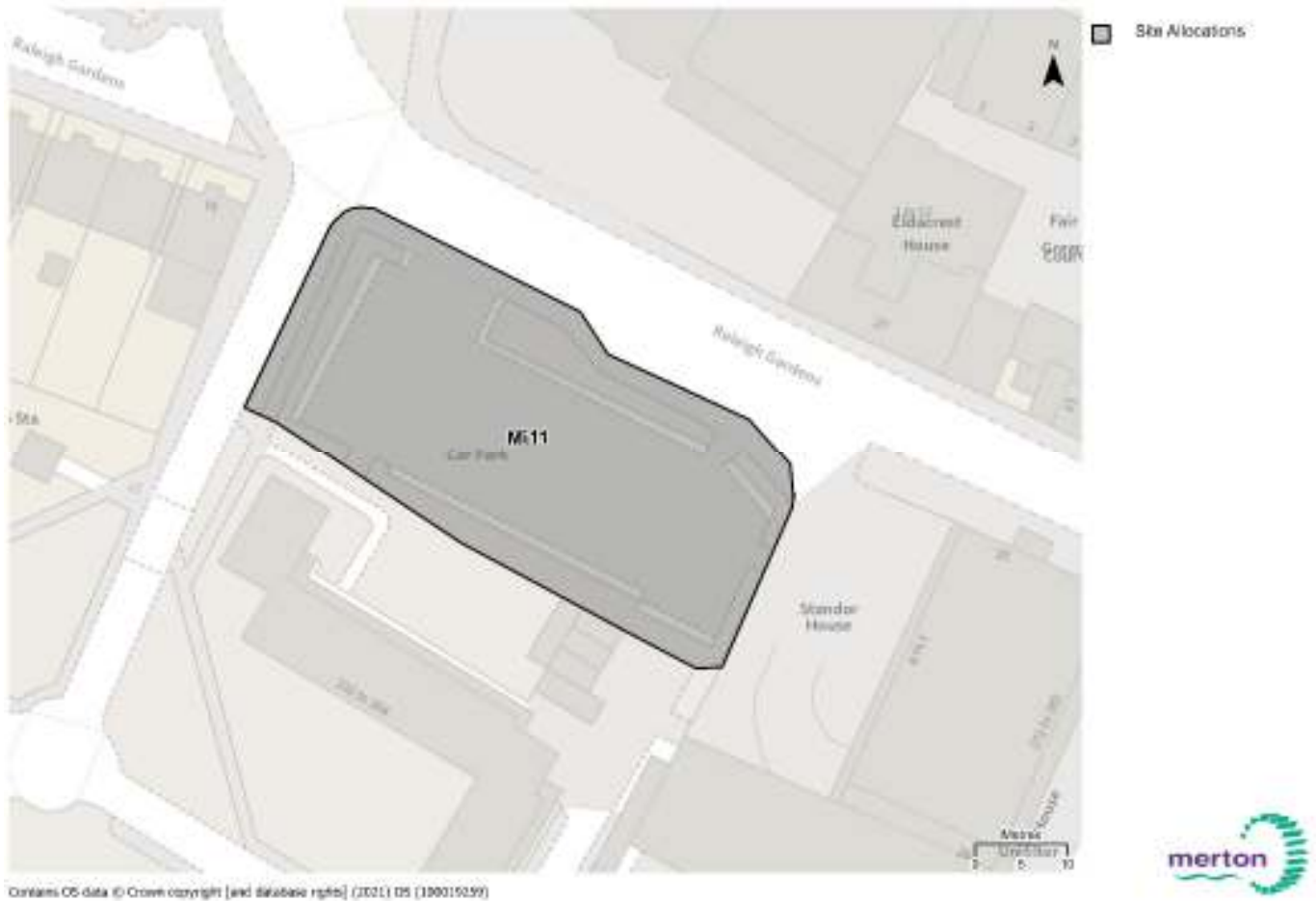
This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Yes. The original pitched roof library building is locally listed but not the more modern flat roofed side and rear extensions.
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Area is susceptible to surface water flooding.
Is in a town centre.	No. The site is 5-minute walk away to the town centre (boundary)
Is in an Opportunity Area	No
Impacts a designated open space.	Figges Marsh open space is approx. 5-

	10 minutes walk from the library.
Impacts on ecology designation.	No.
Public Transport Accessibility Level (PTAL).	PTAL 4 good access to public transport.

Site Mi11: Raleigh Gardens car park, Raleigh Gardens, Mitcham, CR4 3NS



Contains OS data © Crown copyright [and database rights] (2021) OS (100015259)



Ward: Figges Marsh
Site description: The site is a small surface public car park. To the southeast of the site is the parking and service area of Standor House, a two to four storey building with retail uses at ground level and offices above. To the south of the site is a five-storey block of flats and beyond the access road to the west of the site is the flank wall of a two-storey end-of terrace house. To the north of the site, on the opposite side of Raleigh Gardens, is the parking and services area for the three storey buildings that face Upper Green West. To the northwest of the site is a two-storey retail building. Residential terraces continue along Raleigh Gardens to the west.
Site owner: Merton Council
Site area: 0.11ha
Existing uses: Car Park
Site allocation: Residential

Deliverability: 0-5 years

Indicative site capacity (new homes): 30 – 40 new home.

Design and accessibility guidance:

On 16th July 2020 planning permission (19/P4048) was granted for residential development on this site subject to the completion of any enabling agreement and conditions.

Development proposals must supply new homes on an accessible brownfield site and provide active ground level and with front doors opening onto the street wherever possible.

Development proposals must mitigate parking/servicing impacts on neighbouring streets.

Development proposals must incorporate sustainable drainage measures.

Development proposals should explore the potential to supply site access via adjacent side road.

Development will need to protect the residential amenity of adjoining properties to the rear.

Development must respond positively to keeping established building lines on Raleigh Gardens.

Infrastructure Requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan.~~

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

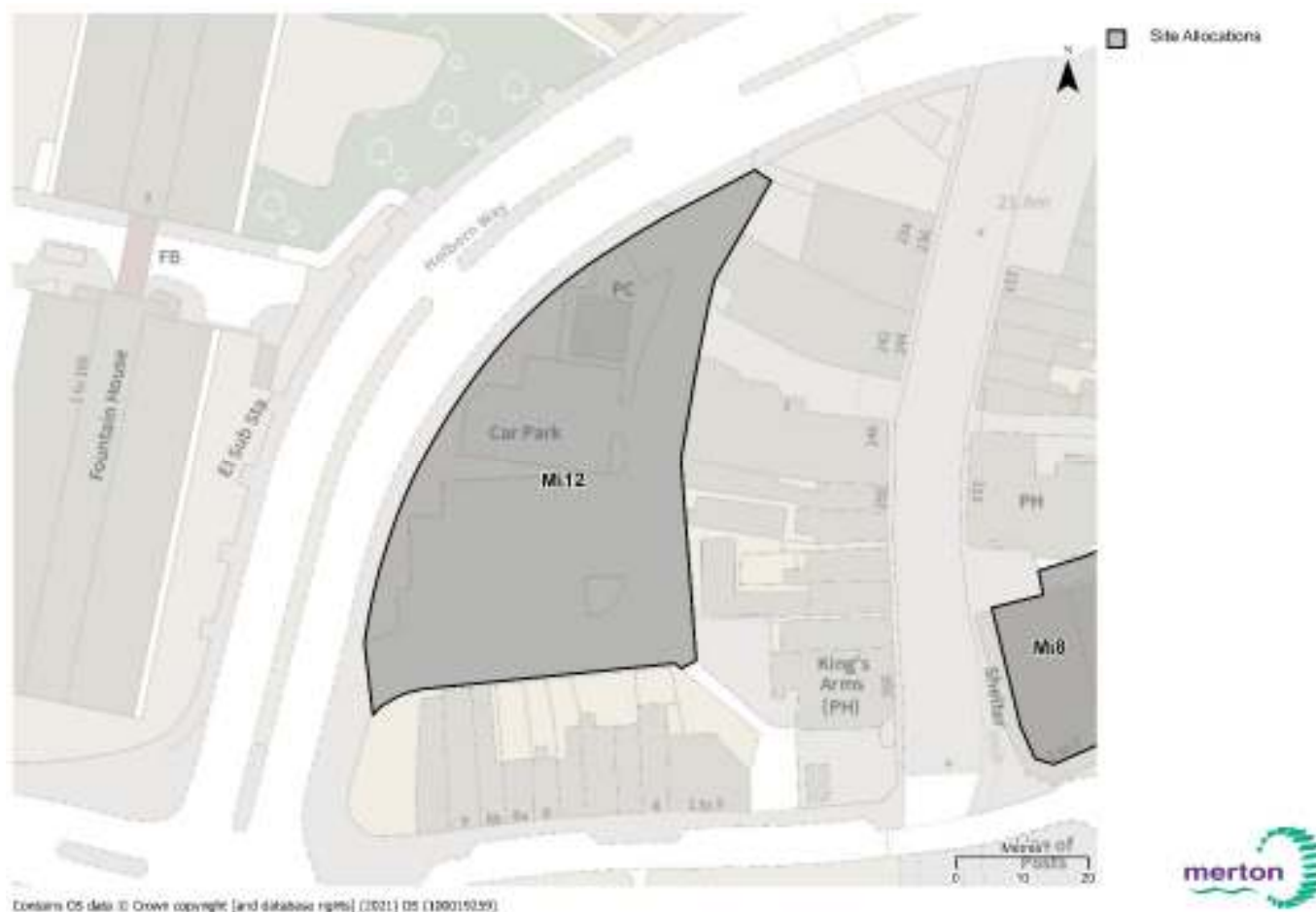
Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek advice from Thames Water about the development of this site.

The site location

Approach to tall buildings	Development of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
Impacts Listed Buildings or undesignated heritage assets.	No.
Impacts a Conservation Area	No.
Impacts on Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No.
Impacts on flooding from all sources.	Yes.

Is in a town centre.	Yes, found in the town centre boundary and within proximity to the primary shopping area.
Is in an Opportunity Area	No.
Impacts a designated open space.	No.
Impact on ecology designation	No.
Public Transport Accessibility Level (PTAL)	PTAL levels 4 to 5, good to very good access to public transport.

SITE Mi12: Sibthorpe Road Car Park, Mitcham, CR4 3NN



Contains OS data © Crown copyright (and database rights) (2011) OS (100015059)

Ward: Figges Marsh

Site description: The site is an irregular quadrant shape, is adjacent a busy main road and is occupied by parking spaces for approximately 50 vehicles, redundant public conveniences, London buses driver facilities and a community recycling area.

Access to the site is via an entry from Holborn Way (a heavy vehicular traffic route) at the northeast boundary with egress along the southwest boundary. There are two points of pedestrian access to the site from London Road via Sibthorpe Road and from the Mitcham Fair Green via a passage adjacent the King's Arms public house.

The site is surrounded by business uses which fronts the London Road bus lane to the east or Upper Green West to the south, however there are also several businesses which have shop fronts orientated toward the car park. To the west of the site on the opposite side of Holborn Road are large four to five storey residential apartment buildings at Sadler Close. The developable part of the site is constrained by the dual frontage businesses addressing the site along the eastern side.

The potential loss or relocation of town centre car parking spaces will need to be considered in line with other site proposals at Raleigh Gardens and Majestic Way.

Site owner: Merton Council.

Site area: 0.26ha
Existing uses: Car Park
Site allocation: Town centre type uses including retail, food and drink, offices, work spaces, leisure, community services and residential on upper floors.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 20- 40 new homes.
<p>Design and accessibility guidance:</p> <p>Development proposals provide an opportunity to continue the enhancements started by Rediscover Mitcham and improve the look and feel of this central site.</p> <p>Development proposals must be well designed to enhance Holborn Way, mitigate traffic noise for its future occupiers as well as mitigating parking, traffic and road safety impacts on neighbouring streets and local amenity. The site is close to the London Road bus lane and any negative impacts on bus operations including during construction should be minimised and mitigation provided.</p> <p>Development should retain and enhance access for pedestrians and cyclists through the site.</p> <p>Any negative transport, delivery and servicing impacts on pedestrian and cycle access and bus operations including during construction should be minimised and mitigation provided.</p> <p>The site provides bus drivers' facilities which must be retained and ideally enhanced as part of any redevelopment of the site.</p> <p>Site may be required to include a secure cycle storage facility (hub) for wider public access.</p> <p>Development of the site must create an attractive streetscape along the eastern side of the site (opposite side to Holborn Way).</p> <p>Respecting and enhancing the character and the views into and from neighbouring Mitcham Fair Green.</p> <p>Development proposals must adopt sustainable drainage measures as part of the design and layout.</p>
<p>Infrastructure Requirements:</p> <p>Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan.</p> <p>Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.</p> <p>This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.</p> <p>The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.</p> <p>Thames Water does not envisage infrastructure concerns about the water supply network</p>

infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek advice from Thames Water about the development of this site.

The site provides bus drivers' facilities which Transport for London require to be retained and ideally enhanced as part of any redevelopment of the site. The council recommends discussions with London Buses prior to the submission of a planning application.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	The site is within the wider setting of a grade I listed building (Eagle House).
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Southeast of the site is susceptible to surface water flooding.
Is in a town centre.	Yes
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact on an ecology designation	No.
Public Transport Accessibility Level (PTAL)	PTAL4

SITE Mi13: 30 St Mark’s Road, Mitcham, CR4 2LF



Ward: Figges Marsh
Site description: The site is occupied by a long-term vacant single storey building in poor condition. The site is located on the edge of Mitcham town centre on the main walking route between the town centre and Mitcham Eastfields rail station. To the northwest of the site is St Mark’s primary school. To the north of the site is the Armfield Crescent Estate which has 5-6 storey buildings.
Site owner: Private ownership site allocation suggested by Merton Council.
Site area: 0.04ha
Existing uses: Vacant
Site allocation: Residential.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 1-2 new homes
Design and accessibility guidance: Development proposals would provide an excellent opportunity to enhance this run-down site and bring it back into use. Development should be of an appropriate density and design that responds positively to the character

of the area and its setting.

Development proposal must not harm the amenity of the adjacent properties.

Infrastructure Requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan.~~

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from advice from Thames Water regarding the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No.
Impacts on Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No.
Impacts on flooding from all sources.	No.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Wandle Valley Regional Park 400m buffer
Impacts on ecology designation.	No.
Public Transport Accessibility Level (PTAL)	PTAL3, moderate access to public transport (adjacent to town centre PTAL 5- very good).

SITE Mi14: United Westminster Schools site, Tamworth Lane, Mitcham, CR4 1DH



Contains OS data © Crown copyright (and database rights) (2021) 06 100019259



Ward: Longthornton
Site description: This large irregularly shaped site is accessible from Tamworth Lane. It was formerly used as playing fields. To the southwest and southeast lie detached, semi-detached and terraced residential properties fronting Crossways Road and Cambridge Road with rear gardens facing the site. The site boundary to the north and east is with Streatham Park Cemetery (privately owned).
Site owner: Private ownership
Site area: 5.14ha
Existing uses: Vacant former playing field.
Site allocation: Creation of new publicly accessible sporting facilities enabled by residential development.
Site deliverability: 5-10 years.
Additional site information: The consultee has provided evidence of the operation of this site for community uses via rental by local sports clubs for several years, the associated local demand for such uses and the associated financial viability on this site. Since work began on Merton’s Playing Pitch Strategy (PPS) in 2017, this site has been part on ongoing discussions between the landowner, the council, Sport England and a variety of national sporting governing bodies, to consider the options

for the site and help determine how sporting facilities could be brought forward on the site (refer to Recommendation G1 of the PPS).

Design and accessibility guidance:

If the entire site cannot viably be used for sports and recreation, the council will consider the creation of publicly accessible and viable sporting or recreation facilities on part of the site enabled by residential development on the rest of the site.

Development of the site is an opportunity to bring back an unviable site into use for sporting activities enabled by much needed new homes.

Opportunity to masterplan the site to provide publicly accessible open space, new homes and associated facilities necessary to support residential development (such as children’s play space).

Development proposals must improve public access between existing public areas and open space through the creation of new and more direct footpaths and cycle paths links.

Development proposals must protect the amenity of neighbouring occupiers.

Development proposals must mitigate parking, transport and road safety impacts on neighbouring streets and local amenity.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~

This site is located in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to public open space. The council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to children’s play space for ages 5-11 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The developer will need to contact Thames Water at the earliest opportunity to discuss the water supply network, wastewater network and wastewater treatment infrastructure capability for this site, including details of the proposed development phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from advice from Thames Water regarding the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.

No

Impacts a Conservation Area

No

Impacts on Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	The site is designated as former Westminster City Schools Open Space and is adjacent to Streatham Park Cemetery designated Open Space. Part of the site is within the Wandle Valley Regional Park 400m buffer area.
Impacts an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

SITE Mi15 Taylor Road Day Centre, Wakefield Hall, Taylor Road, Mitcham CR4 3JR



Ward: Colliers Wood
Site description: The site consists of a single pitched roof building that is surrounded by two storey houses.
Site owner: Merton Council
Site area: 0.08ha
Existing uses: Day care centre
Site allocation: Mixed use community (Clinics, health centres, crèches, day nurseries, day centre) and residential or solely residential if the community service is provided elsewhere.
Site deliverability: 0-5 years.
Indicative site capacity: 2-6 new homes
Design and accessibility guidance: Facilitate the provision of a modern community facility on the lower floors and create a more secure environment, helping to minimise vandalism and design out crime. Improve parking, traffic and road safety impacts on neighbouring streets and local amenity or, if a mixed-use development, residential uses should be on upper floors. Development proposals will need to mitigate the potential parking, traffic and road safety impacts on neighbouring streets and amenity. Development of the site must protect the residential amenity of those properties adjacent to and in the

vicinity of the site.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. ~~have regard to Merton's Infrastructure Delivery Plan.~~

This site is located in an area identified as being deficient in access to public open space. The council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

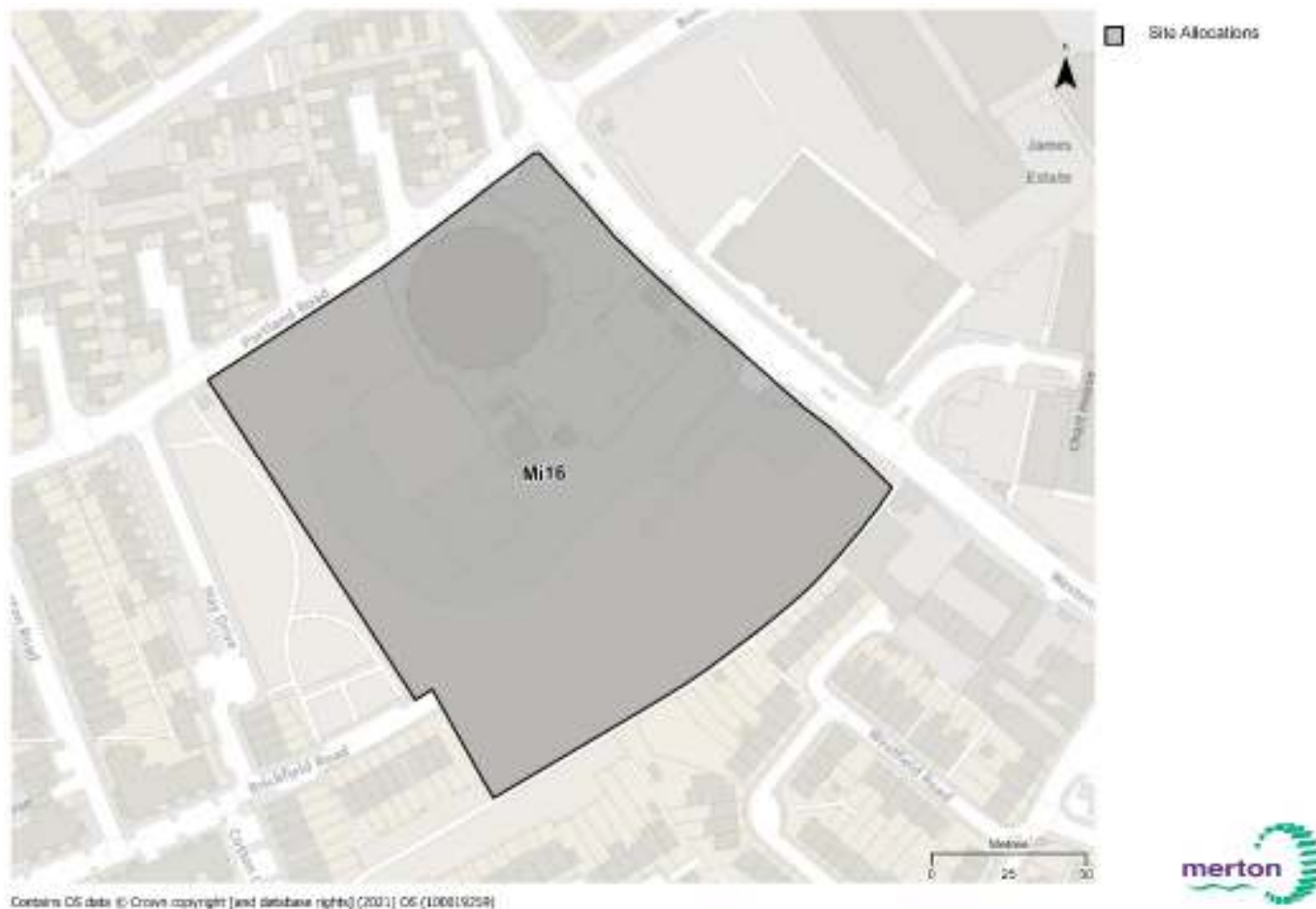
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from advice from Thames Water regarding the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport

SITE Mi16: Mitcham Gasworks Western Road, Mitcham, CR4



Ward: Lavender Fields
<p>Site description: The site has been cleared except for a large, unused, gas holder in the northern corner of the site. Access to the site is via a driveway entrance from Western Road, a busy road which connects the site to Mitcham town centre. To the northeast, at the other side of Western Road is a large Asda supermarket and surface car park. To the west and east are two storey homes. To the south of the site lies a recent development that was formerly part of the same site and is now a series of three-storey residential apartments and a medical centre.</p>
<p>Site owner: National Grid Property (owners). Allocation suggested by St William Homes LLP (a partnership between Berkley Homes and National Grid Property).</p>
<p>Site area: 2.4 ha.</p>
<p>Existing uses: The site is currently vacant <u>for c 15 years aside from a large gasholder within the northern corner of the site that has permission for demolition having most recently been used as regional offices for National Grid.</u></p>
<p>Site allocation: Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre).</p>
<p>Site deliverability: 0-5 years</p>
<p>Indicative site capacity: 200 – 400 new homes.</p>

Design and accessibility guidance:

The site had outline planning permission for a major residential and employment scheme. The residential element has been delivered over 5 years ago (Hay Drive etc). However, the employment part of the permission (which extended onto the site surrounded by the red line, reaching Western Road) lapsed in July 2012. The site's potential uses, and layout is currently constrained by the gasholder on the corner of Western Road and Portland Road. Although the gasholder is no longer used, it has not been officially decommissioned. The landowners are proposing it decommission but until that time development within the vicinity of the gasholder is currently subject to restrictions set out in the Health and Safety Executive's land use planning method (PADHI) which limits the potential for residential-led mixed use development until the gasholder is decommissioned.

The site is subject to a Hazardous Substance Consent (HSC). An application for the continuation of this HSC was granted in 2002 (Ref: 02/P1493). The decommissioning the site and the cancellation of the HSC requirements to enable the redevelopment of the site. The site accommodates two electricity sub stations, an operational gas Pressure Reduction Station (PRS) and above ground gas mains stemming from the historic installation use. A large redundant gasholder and telecoms mast are found to the north of the site on the SGN (Southern Gas Networks) owned land. The site would require decontamination due to its earlier use.

Development of the site provide an excellent opportunity to enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to the overall surroundings and connectivity to the town centre.

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys.

Development proposals must be laid out to be permeable and legible with full public access through the site, making it easier for people living locally to walk and cycle through the site to access Mitcham town centre or towards Church Road beyond.

The existing "Field Gate Lane" public footpath to the south east of the site must be protected and enhanced to provide a high quality link between Western Road and Miles Road.

Development proposals must deliver much needed new homes, play space, open space and community uses within a landscaped setting on a large brownfield site. The site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

Infrastructure Requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas

infrastructure network.

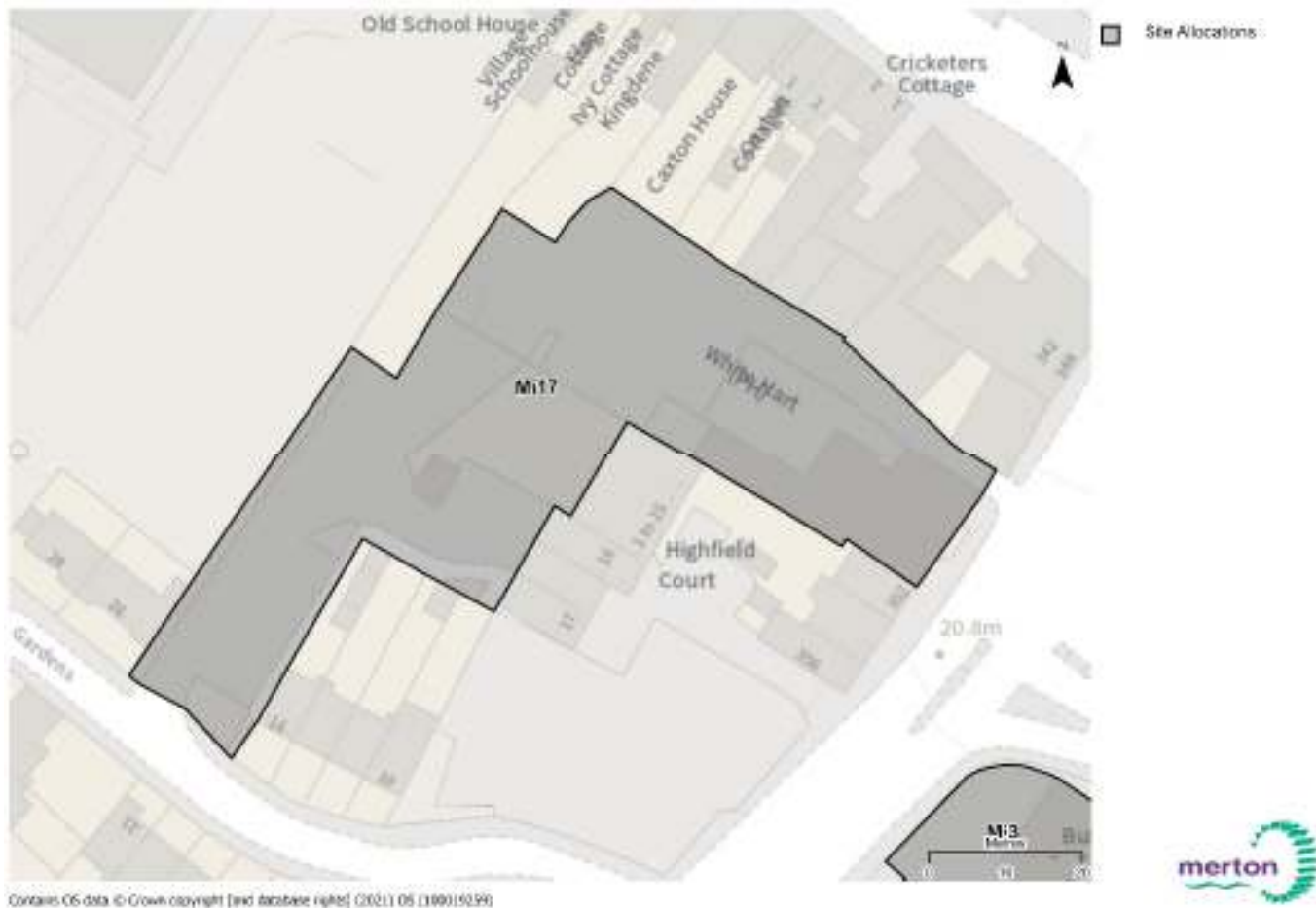
Thames Water have indicated that the scale of development for this site is likely to require upgrades of the water supply network infrastructure, but there are no infrastructure concerns for the wastewater network or wastewater treatment infrastructure capability. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development> The council will require evidence of liaising with Thames Water with any submitted planning application. The council will be liaising with Thames Water and will seek their advice as part of the planning process. Merton Council will also, liaise with and seek advice from Thames Water regarding the development of this site.

This site contains National Grid infrastructure in the form of underground cable 264685. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid’s overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.

The site location	
Approach to tall buildings	A mixed-use redevelopment of the site could include taller buildings <u>of up to 9 storeys</u> subject to consideration of <u>design policies impacts on existing character, heritage and townscape</u> .
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	<u>No, adjacent to</u> Mitcham <u>a</u> Archaeological <u>p</u> Priority <u>zone</u> <u>Area Tier 2</u>
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	No
Is in a town centre.	No, however, the site is very close to from Mitcham town centre.
Is in an Opportunity Area	No
Impacts a designated open space.	Wandle Valley Regional Park 400m buffer. Adjacent to open space.
Impact an ecology designation.	No
Public Transport Accessibility Level	PTAL 3 good access to public transport.

(PTAL)

SITE Mi17: White Hart Pub and back land London Road, Mitcham, CR4 3ND



Ward: Cricket Green
Site description: and to rear of properties on London Road, part of which is a car park for the White Hart pub. Access from London Road and Broadway Gardens. The playground for Cricket Green school bounds the site to the northwest.
Planning permission 18/P2216 was resolved to be granted for 15 homes and retention of ground floor non-residential on this site on 28 th April 2021
Site owner: Private owner
Site area: 0.31ha
Existing uses: Public House (currently closed) and private car park.
Site allocation: Restaurant /cafe or public house or drinking establishment with potential for residential development to enable the restoration and viable function of the White Hart.
Site deliverability: 5-10 years
Indicative site capacity: 10- 15 new homes.
Design and accessibility guidance: Development proposals must be sensitive to heritage assets in the surrounding area including the White Hart pub and Cricket Green.

Development will need to improve the condition of Grade II* listed White Hart public house and support a viable use of the White Hart pub.

Development proposal must be sensitive to the school playground in design and layout.

Infrastructure Requirements:

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#) ~~have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.~~

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

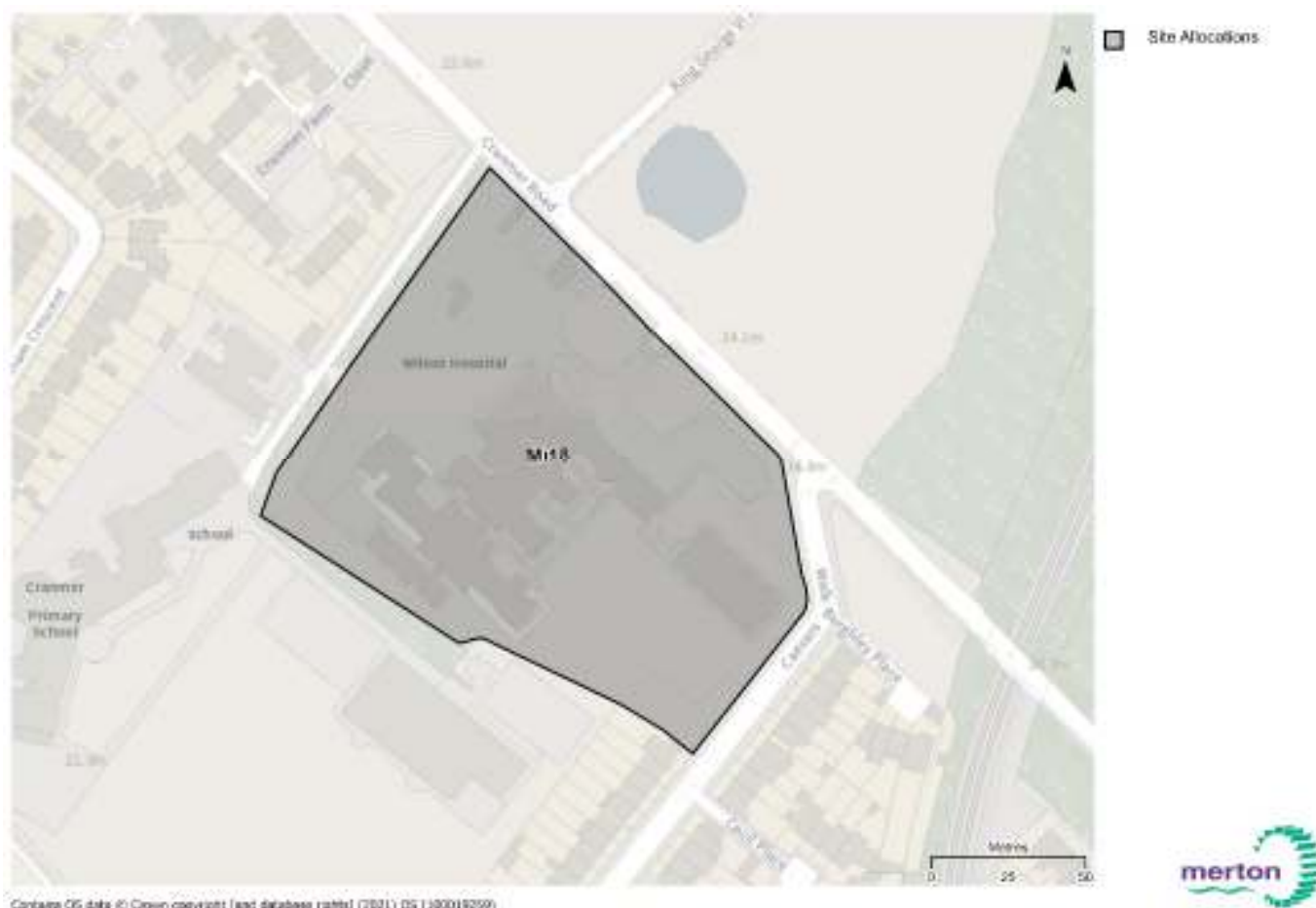
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from advice from Thames Water regarding the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Grade II listed public house (The White Hart currently closed)
Impacts a Conservation Area	Mitcham Cricket Green Conservation Area,
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Wandle Valley Regional Park 400m buffer zone
Impact on an ecology designation	Yes, Green Corridors
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mi18: Wilson Hospital Cranmer Road, Mitcham, CR4 4LD.



Ward: Cricket Green.
Site description: The site consists of a large part single and part two-storey hospital building fronting Cranmer Road. Along the south-eastern boundary is Caesars Walk and two-storey terraced houses. To the south and southeast of the site is Cranmer Primary School and its playing fields. The access road to Cranmer Primary School runs along the north-western boundary with a row of two-storey terrace houses beyond. On the opposite side of Cranmer Road is a large open space known as Cranmer Green.
Site owner: National Health Service (NHS)
Site area: 1.81ha
Existing uses: Health centre
Site allocation: Healthcare with community and enabling residential development. or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham.
Site deliverability: 5-10 years
Indicative site capacity (new homes): Dependent on relocation of health care facilities.
Design and accessibility guidance:

Residential, following the relocation of existing services, completion and opening of a healthcare facility in the Mitcham area.

Development of the site is an opportunity to either provide a health centre/community health centre in a neighbourhood with health inequalities/ poor health or to provide new homes in an area of housing needs (if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham).

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable transport modes and will not result in a reliance on car journeys.

Development proposals must keep the positive feature of the Local Listed building and preserve and enhance the Conservation Area.

An investigation of the potential impact of any proposed development on an archaeological heritage must be carried out.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area.

Development proposals must protect the residential amenity of the adjacent properties.

Infrastructure Requirements:

To ensure that healthcare provision is delivered in this area and that there is no loss of potential NHS sites until this happens, the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital or Birches Close sites.

Development proposals for this site must [refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.](#)

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. Should residential development be included on site, we will require on-site playspace provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

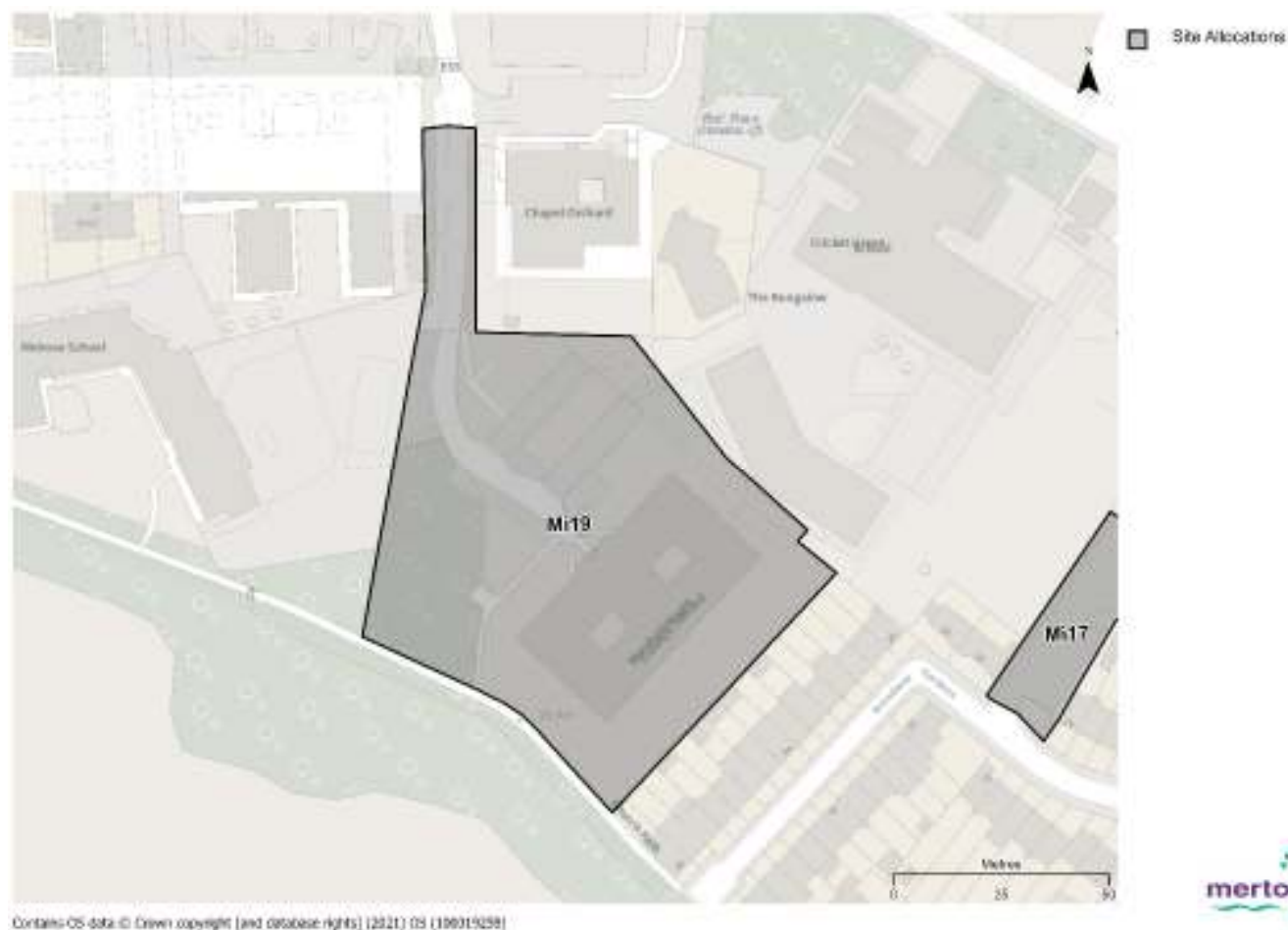
Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from advice from Thames Water regarding the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.

Part of the frontage of the building (facing Cranmer Road) is locally listed.

Impacts a Conservation Area	Yes, Mitcham Cricket Green Conservation Area.
Impacts on Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, some surface water flooding and site is in a critical drainage area.
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Yes, the site is adjacent to Open Space to the south and north. Site is within the Wandle Valley Regional Park. Site is adjacent to Mitcham Common to the north which is Metropolitan Open Land.
Impacts an ecology designation.	Yes, the site is part of a Green Corridor and is adjacent to Cranmer Green Local Nature Reserve.
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

SITE Mi19: Worsfold House Church Road, Mitcham, CR4 3FA

Contains OS data © Crown copyright (and database rights) (2021) OS (100019258)

Ward: Cricket Green

Site description: Worsfold House is a single storey council office building served by an 80 m long access way from Church Road. Fronting Church Road, separating the site from the road, is Chapel Orchard, a single storey former office building and a single storey former surgery building being used as part of Cricket Green school. The site is surrounded by sensitive land uses, including the two special needs schools at Melrose and Cricket Green, the nearby residential properties including Hall Place.

The surrounding area is characterised by large low-rise buildings with generous spaces between them and many large trees and shrubs. At the southwest boundary is a footpath (Church Path) with a large publicly accessible park (London Road playing fields) beyond. To the west is a single storey special needs secondary school (Melrose School) and a two-storey hostel building (Hall Place).

To the east of the site is a part one and two storey special needs school (Cricket Green School) and to the southeast is a row of two storey terrace houses that front onto Broadway Gardens.

Site owner: Merton Council

Ward: Cricket Green	
Site area: 0.81ha	
Existing uses: Wandle Valley Resource Centre – office	
Site allocation: A suitable mix of school and/or residential.	
Site deliverability: 0-5 years.	
Indicative site capacity (new homes): 45-65 new homes.	
Design and accessibility guidance:	
<p>The site is an opportunity to provide new homes which are sympathetic and embrace the historic setting of Mitcham Cricket Green.</p> <p>Development proposals will have to be delicately designed to respect the amenity of the adjacent properties and respect the character of this part of the conservation area.</p> <p>Development proposal must keep the functional green corridor that will allow for species migration.</p> <p>Investigate the potential impact of any proposed development on archaeological heritage.</p> <p>Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys</p> <p>Development proposals should provide links across the site to the existing footpath (Church Path) along the southern boundary.</p>	
Infrastructure requirements:	
<p>Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. have regard to Merton's Infrastructure Delivery Plan and Green</p> <p>This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.</p> <p>Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links ensuring that the development enhances access to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.</p>	
The site location	
Impacts Listed Buildings or undesignated heritage assets.	Near to by not visible from Vestry Hall and St Peter’s Church.
Impacts a Conservation Area	Yes, Within Mitcham Cricket Green Conservation Area.
Impacts on Archaeological Priority Area	Yes.

Ward: Cricket Green	
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is susceptible to surface water flooding and drainage issues.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Site is within the Wandle Valley Regional Park 400m buffer and adjacent to Open Space.
Impacts on an ecology designation.	Yes, Green Corridor and adjacent to a Site of Importance for Nature Conservation (SINC).
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

(Site moved from Morden Neighbourhood)

SITE Mo3: Imperial Sports Ground Tooting and Mitcham Hub, Bishopsford Road, Morden, SM4 6BF.



Ward: Ravensbury

Site description:

The site is a slightly raised field with road frontage onto Bishopsford Road (A217). To the northeast of the site are the artificial grass pitches associated of the Tooting and Mitcham Football Club and other associated pitches and sports buildings. South of the site is Poulter Park and along the southwest boundary of the site, which is also the borough boundary with the London Borough of Sutton, is a vehicle access road to Poulter Park and the dwellings within Bishopsford House, and beyond the road are the rear gardens of dwellings on Hillfield Avenue.

Site owner: Tooting and Mitcham Sports and Leisure Ltd.

Site area: 0.47ha

Existing uses: Field

Site allocation: Intensification of sporting activity on the wider Tooting and Mitcham Hub site may be supported by enabling development on this site subject to meeting planning policy, evidence and consultation. Any enabling development would be expected to directly fund long-term capital investment in sporting facilities on Tooting and Mitcham Hub.

Site deliverability: 0-5 years.

Indicative site capacity (new homes): 60-77 new homes.

Design and accessibility guidance:

To be considered as enabling development for the Tooting and Mitcham Hub, any proposals for residential development would be expected to clearly prove how and when they would directly deliver capital investment in Tooting and Mitcham Hub's sporting provision. This could be by considering both in a single planning application with a single legal agreement to secure the enabling investment.

Due to the nature of this site, a high-quality design will be needed to complement the sensitive setting. Development proposals need to be designed to minimise their impact on the openness of the Metropolitan Open Land and to enhance the nature conservation value of the green corridor.

As an Agent of Change, the enabling residential development needs to be designed and built to minimise the impact for new occupiers, and to ensure that the established noise generating sporting venues are still viable and can continue and/or grow without unreasonable restrictions being placed on them.

Potential parking, traffic and road safety impacts on neighbouring streets and local amenity, will need to be mitigated.

Proposals that include residential dwellings, which is defined as More Vulnerable development, would only be allowed in Flood Zone 3 (along the northern edge of the site) where it can be demonstrated that the Exception Test is satisfied:

1. that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk,
2. that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

To satisfy the requirements of the Exception Test and to mitigate the flood risk, development proposals need to incorporate the recommendations in Merton's Strategic Flood Risk Assessment.

On 20 August 2020, Merton's Planning Applications Committee resolved to grant planning permission for the development of 77 homes on the site, subject to the completion of a S106 legal agreement and conditions. This application is considered to be of potential strategic importance and therefore, as part of Stage 2 of the referral process, the Mayor of London [reviewed the application. In April 2021, the Mayor decided that the council's decision could stand and the application was therefore approved. ~~now has to make a decision to allow the Planning Applications Committee decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority.~~](#)

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the wastewater network infrastructure but does not envisage any infrastructure concerns about the water supply network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with

Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

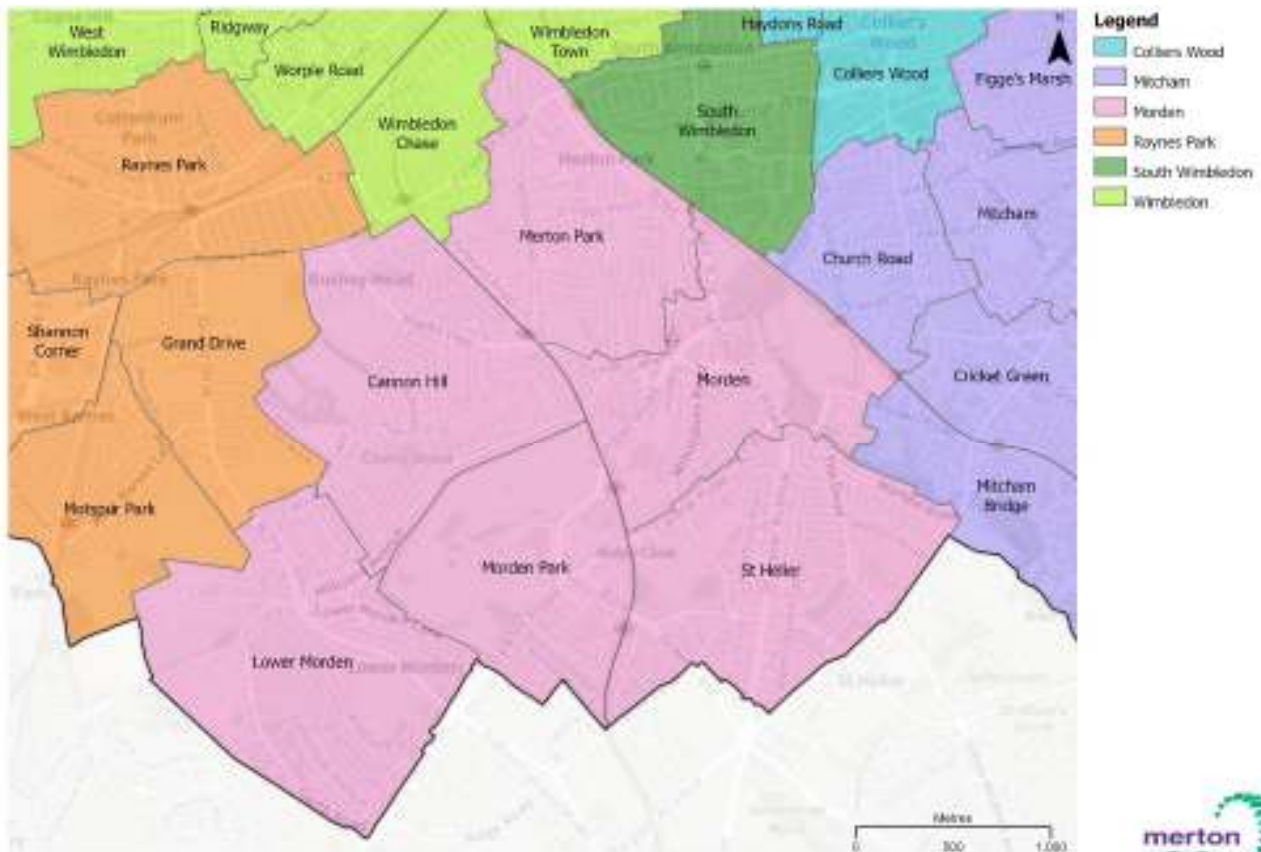
The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts on Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Yes, northern edge of the site in Flood Zone 3a. The centre of the site in susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, the site is designated as protected open space and Metropolitan Open Land (MOL). Poulter Park, to the south of the site, is also designated as MOL in Sutton's Local Plan. The site is within the Wandle Valley Regional Park and the 400m buffer area.
Impacts on ecology designation.	Yes, within a designated Green Corridor and near to a Site of Importance for Nature Conservation (SINC).
Public Transport Accessibility Level (PTAL)	PTAL 4, very poor <u>2 poor</u> access to public transport.



05. MORDEN



Contains OS data © Crown copyright and database right (2021) OS (100019259)

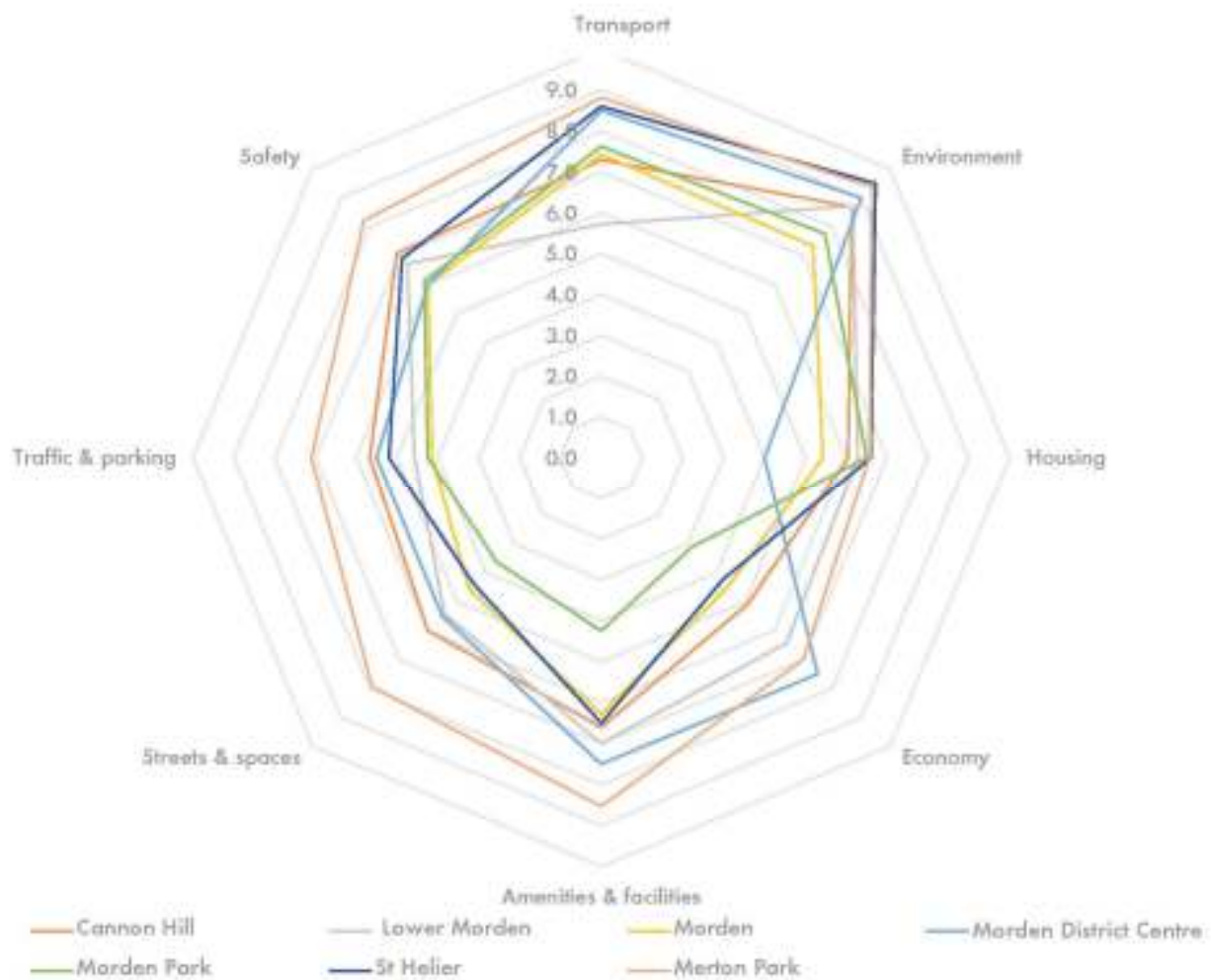


Contains OS data © Crown copyright and database right (2021) OS (100019259)



PLACE PROFILE: MORDEN

As part of the [Borough's ongoing Merton Character Study SPD 2021](#), 415 Merton residents took part in an online public survey, of which 91 people live in Morden. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. ~~This work was also used to inform the Borough Character Study 2021.~~



Results from residents of Morden rating their neighbourhood

KEY OBJECTIVES: MORDEN

The following objectives provide an overarching vision for Morden. More detail can be found in the policy and justification sections that follow.



Providing more high quality homes

~~Incorporate~~ Provide new homes in ~~the Morden and in particular, within the Morden Regeneration Zone Wider Morden Town Centre Area~~ with a diverse mix of housing sizes and tenures.



Diversifying and supporting retailers

~~Supporting~~ an appropriate and diverse mix of retail, office, community and leisure uses, including night time uses.



Improving public space

Prioritise pedestrians and cyclists in the regeneration of public spaces and streets in ~~the Morden Regeneration Zone and the Wider Morden Town Centre Area~~.

CHARACTER: MORDEN

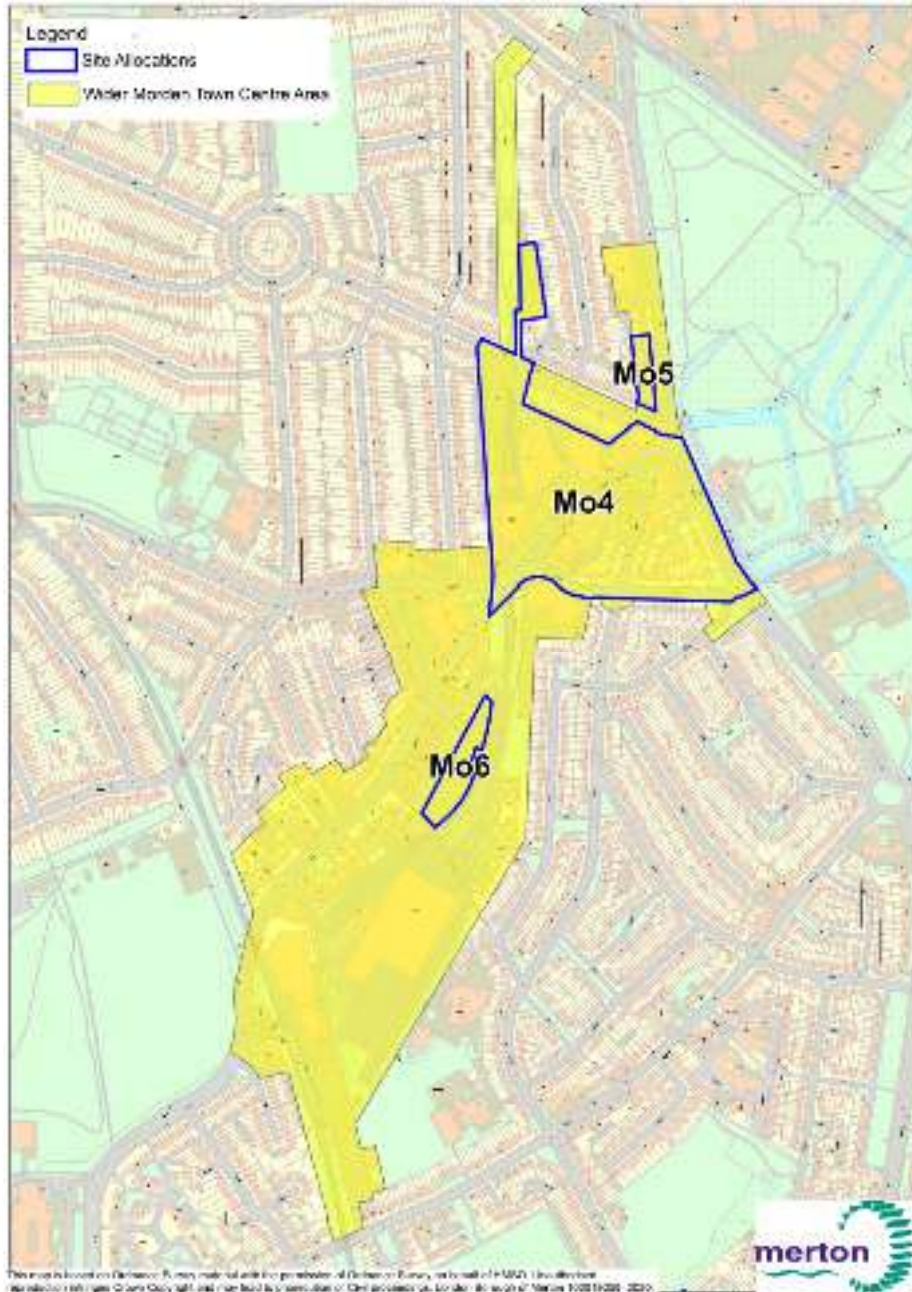
These photos illustrate the diverse character found across Morden [Photograph of mosque updated.](#)





MORDEN: POLICY N5.1

[Delete map](#)



This policy supports the rejuvenation-regeneration of Morden Town Centre to create a modern, attractive and vibrant destination that meets the needs of the current and future residents, businesses and visitors, and provides economic, social and environmental benefits. This will ~~be achieved through the delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes~~ include intensification and comprehensive development-regeneration within the Morden Regeneration Zone (Site Mo1). ~~The development capacity of the Wider Morden Town Centre Area will be significantly~~

increased through a plan-led approach which will:

- incorporate new homes at higher densities than the surrounding residential streets, with a diverse mix of housing sizes and tenures.
- improve and diversify space for shops and businesses.
- provide high quality public realm and attractive and useful public spaces and planting.
- create healthier streets with better connectivity and permeability for pedestrians and cyclists.
- reduce traffic dominance, improve walking, cycling and vehicle links into and around the town centre; and
- provide better services and facilities for the people who live, work or study in, or pass through Morden.

By focusing regeneration in the Wider Morden Town Centre Area, this plan-led approach will help to enhance the character and distinctiveness of the surrounding suburban Morden Neighbourhood.

We will achieve this through:

- a. The comprehensive regeneration of the Morden Regeneration Zone (Site Mo41), to optimise the delivery of new homes (including affordable homes), improve the street scene and public realm, make it easier for all to get around, and support businesses and other appropriate uses within the Morden Regeneration Zone. Proposals that assist the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo41, will be supported.
- b. Improving the appearance, user experience and air quality of Morden Town Centre by relocating the bus stands outside Morden underground station away from their current location to help create healthier streets and a welcoming public space outside the Morden underground station entrance.
- c. Incorporating 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.
- d. Incorporating green infrastructure that contributes to improved drainage, air quality and the creation of green links through the Morden Regeneration Zone ~~and the Wider Morden Town~~

~~Centre Area~~, connecting to the open spaces in the surrounding Morden Neighbourhood.

- 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.~~
- f. Supporting an appropriate mix of retail, office, community and leisure uses, including night time uses, within the Morden Regeneration Zone ~~and the Wider Morden Town Centre Area~~, which provide an appropriate level of active frontage and do not have an undue impact on neighbouring amenity.
- ~~g. Investigating the feasibility of decentralised energy and district heating which takes account of opportunities within the Morden Regeneration Zone, the Wider Morden Town Centre Area and potentially the wider Morden Neighbourhood. Suitable futureproofing measures should be implemented where appropriate.~~
- ~~h. Supporting incremental site-by-site development outside the Morden Regeneration Zone but within the Wider Morden Town Centre Area, where it:~~
- ~~• is of a high quality design,~~
 - ~~• complements and co-ordinates with the surrounding built form and public realm,~~
 - ~~• supports the delivery of new homes and complementary town centre uses, and~~
 - ~~• makes it easier for all to get around and in particular, encourages walking and cycling.~~

Surrounding Morden Neighbourhood

In the surrounding Morden Neighbourhood we will:

- ig. Ensureing that development ~~within the Morden neighbourhood, which surrounds the Wider Morden Town Centre Area~~, conserves and enhances its suburban character of terraced and semi-detached homes and abundant green infrastructure.

j). Supporting transport improvements within the Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area, such as improvements to the existing tram network and improvements that help enable sustainable and active travel choices.

Strategic Heights Diagram - Morden Regeneration Zone



Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)

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



JUSTIFICATION SUPPORTING TEXT

- ~~5.1.1. Morden's initial growth was fuelled by investment in London's Underground network, with the arrival of the tube in 1926 which resulted in the rapid development of 'Metroland' type residential suburbs in the surrounding area during the following decade.~~
- ~~5.1.2. The attraction of abundant green open spaces, clean air and easy access into central London, made the area a popular destination for families in search of a suburban lifestyle.~~
- ~~5.1.3. Almost 100 years later, Morden is changing once again. There is a strong presence of a working age population with a high proportion of families and younger people. People in search of a more suburban lifestyle are heading to Morden due to its leafy suburban nature and excellent connections into central London. Morden's transformation is required to ensure that it continues to meet the needs of the existing and future residents, businesses and users of the area.~~

Character

- 5.1.4. The character of Morden ~~†Town~~ ~~€Centre~~ has eroded over time, but it still clearly has Inter-War characteristics with an Art Deco theme; the underground station building being a significant building from that era and the theme evident in the white rendered shop facades and stone corner buildings of the shopping parades. The scale and comprehensive nature of the regeneration within the Morden Regeneration Zone provides the opportunity to reimagine the town centre and to create new character areas and features. It is important that new development celebrates, develops and strengthens ~~this the existing~~ physical character, but without necessarily copying it unimaginatively.
- 5.1.5. In terms of activity, Morden ~~†Town~~ ~~€Centre~~ is a busy transport interchange and the civic focus of the borough. The ~~†Town~~ ~~€Centre~~ also has a broad range of shops, cafes and restaurants. Although this adds to its diversity and distinctiveness, it is undermined by the intrusive road layout, busy traffic and visual dominance of buses. These issues need to be addressed in order to enable the town centre to develop and flourish as a modern centre, and to re-energise as a distinct District Centre.

Background

- 5.1.6. In 2009 the 'moreMorden' vision was endorsed by the Council following the first of numerous subsequent rounds of public consultation. The aim of this document was to support Morden in becoming a more sustainable town centre, including an emphasis on Morden as an important transport node and supporting a renewed sense of civic pride. This aim has been captured in Local Plan documents thereafter.
- 5.1.7. Significant progress was made in 2015 when Transport for London ([TfL](#)), a major landowner within Morden town centre, identified the Morden underground station site as one of its priority development sites and when the Mayor of London announced Morden as one of the GLA's Housing Zones.

Strategic Development Framework

- 5.1.8. In 2018 Merton Council and Transport for London jointly appointed consultants to carry out all the necessary due diligence studies, including architects Hawkins Brown, to develop a Strategic Development Framework (SDF) for the regeneration of the Morden Regeneration Zone.
- 5.1.9. The Strategic Development Framework defines:
- Why the regeneration of Morden [Regeneration ZoneTown-Centre](#) is necessary and important (the 'Vision').
 - What the project should seek to deliver (the 'Project Objectives').
 - How the project should be delivered in terms of methods and approaches (the 'Delivery Principles'); and
 - Where various elements of the regeneration scheme should be located and connected as part of a broader master plan (the 'Spatial Principles').
- 5.1.10. These elements are not meant to be prescriptive, but they set out a framework for project delivery at a high strategic level in order to provide a clear but flexible way forward and ensure that the regeneration is delivered in line with stakeholder expectations.
- 5.1.11. The SDF will inform the procurement of a development partner who will help to deliver the regeneration within the Morden Regeneration Zone.

Opportunity Area

5.1.12. The ~~Wider Morden Town Centre Area~~ Morden town centre is within an Opportunity Area as designated in the London Plan 2021 and identified in Figure 2: Opportunity Area, in Chapter 1B 'Good Growth'. We will work with the GLA to produce an Opportunity Area Planning Framework which will include the significant contribution that the ~~Wider Morden Town Centre Area~~ Morden Regeneration Zone will make towards the Opportunity Area's target to accommodate 5000 new homes and 6000 new jobs.

The need for comprehensive regeneration

~~5.1.13. Morden town centre was identified as an opportunity for housing intensification in Merton's 2011 Core Planning Strategy (CS3), with the Sustainability Appraisal recognising positive improvements that could be made to retail provision, the public realm and the capacity of Morden's transport interchange.~~

5.1.14. One of the aims of this Local Plan policy is to improve the experience for the current and future users of Morden town centre, making it a destination and not simply a thoroughfare. This will be facilitated by improving the quantity, quality and mix of housing offer through ~~optimising intensification of~~ residential development at the heart of Morden, alongside the delivery of a range of associated improvements to the public realm, transport and ~~town centre type uses~~.

5.1.15. Within the Morden Neighbourhood there is a variety of family sized dwellings, with a limited number of smaller dwellings and flats, particularly within close walking distance to the underground station. The Morden Regeneration Zone provides the opportunity to respond to this need and create a broader range of housing types and tenures. This will also have a significant effect on the types of shops and businesses that will be attracted to the area and is important in enhancing the vibrancy, vitality and economic success of the town centre – helping it to rejuvenate in a sustainable manner that is robust enough to deal with future change.

5.1.16. The housing policies in this Local Plan provides details on Merton's housing targets for the plan period. As illustrated in the SDF, the Morden Regeneration Zone represents an ideal opportunity to provide circa 2,000 residential units towards meeting this target, the largest single development opportunity in Merton. This is in addition to a number of other small sites identified as Site Allocations within the surrounding Morden

Neighbourhood.

~~5.1.17. Within the Wider Morden Town Centre Area, the provision of adaptable housing will be sought, namely homes that can adapt internally to the changing circumstances of their occupants, which requires well thought out, flexible internal layouts as per the Mayor's Design Guidance. Mixed tenure and a range of dwelling types, along with modern flexible business spaces, will create a mixed community that responds to housing, business and leisure needs and creates a vibrant and diverse community that is robust in times of change and has appropriate protection against decline.~~

5.1.18. As Merton Council and TfL (~~Transport for London~~) both own a significant portion of land within the Morden town centre, they both have a major role to play in enabling and delivering change within the town centre, particularly within the Morden Regeneration Zone. There are also multiple other land ownership interests within the Morden Regeneration Zone and a land assembly strategy will be required to ensure that the site can be ~~developed in a comprehensive manner, to~~regenerated comprehensively and avoid fragmented development and suboptimal 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.

~~5.1.19.~~ A plan-led approach, as set out in the SDF, is required to enable the delivery of a regenerated town centre with circa 2,000 homes and to ensure that the Morden Regeneration Zone provides the economic, environmental and social benefits for the local community. This plan-led approach may take the form of a masterplan, supplementary planning document or an outline planning application.

~~5.1.20. 5.1.19. The part of the Wider Morden Town Centre Area that is outside the Morden Regeneration Zone, is the area for incremental change, where the design and layout of public realm and streetscape is to be actively co-ordinated by the council, so that the Morden Regeneration Zone sits well within the local context.~~

Healthy Streets Approach: transport, accessibility and public realm

~~5.1.21. 5.1.20.~~ The Mayor's aim for 2041 is for 80 per cent of Londoners' trips to be on foot, by cycle or by using public transport and for all Londoners to be able to undertake at least the 20 minutes of active travel each day required to stay healthy. High quality public spaces can support this and the SDF demonstrates how the Healthy Streets Approach

could be delivered within a regenerated Morden town centre.

5.1.22-5.1.21. TfL has identified their land around Morden underground station as one of their major potential development opportunity sites, recognising the benefits that such a development can bring through improvements to the existing transport infrastructure, to help meet the Mayor's Healthy Streets Approach.

5.1.23-5.1.22. The current location of the bus standing facilities directly outside the underground station creates a poor user experience and has a negative impact on air quality in Morden. One of the key aims of the comprehensive [redevelopment-regeneration](#) of the Morden Regeneration Zone is to relocate the bus standing facilities away from their current location. Suitable alternative bus standing and stopping facilities will need to be agreed and provided as part of the plan-led approach to the regeneration of the town centre. [The new bus standing facilities are identified as a medium to long term requirement in the Infrastructure Delivery Plan 2021 and in accordance with policy IN 14.1 Infrastructure, developments may be required to make planning contributions towards the provision of these facilities.](#)

5.1.24-5.1.23. The dominance of the road and traffic network throughout Morden [Town Centre](#) results in a poor experience for pedestrians and cyclists and negatively impacts on public realm. As such, there is a need for improvements to ensure that pedestrians are given a greater priority, including a legible station forecourt that facilitates improved movement. Creating a safer, more attractive pedestrian environment to encourage the high levels of commuter footfall to linger, is also key to invigorating the local economy. These matters, including the opportunity to review the Transport for London Road Network (TLRN) and potential removal of the gyratory, have been captured in the SDF, which incorporates the Healthy Streets Approach.

5.1.25-5.1.24. TfL's Sutton-Link project, which proposes the extension of the tram network between Merton and Sutton, has been paused as it has not proved possible to identify the funding needed to deliver the scheme. If circumstances change and new funding opportunities emerge then the case for taking the scheme forward will be reviewed. The preferred route runs within 400m from the Morden Regeneration Zone (i.e. at the Central Road roundabout). We will continue to work with Transport for London and others to provide good links between [the Wider Morden Town Centre Area](#) [Morden Town Centre](#), the tram and the underground.

5.1.26-5.1.25. Urban layouts should be based on a permeable and easily navigable network of recognisable streets, routes and spaces that link in seamlessly with surrounding development and facilitate walking, cycling and use of public transport. Streets that are easy to navigate are easy to understand and remember and make places comfortable and attractive. A network of connected streets with clear wayfinding usually enables shorter journeys and more convenient routes that are realistic to walk or cycle.

5.1.27-5.1.26. This has important implications for the design, appearance and use of buildings and where they are located in relation to each other. Morden station is a key landmark building and should remain a visual focal point in the town centre. The current office building above it could be greatly enhanced to improve its relationship to this locally listed building.

5.1.28-5.1.27. Potential solutions to these urban design matters and indicative details of a potential hierarchy of streetscapes for [the Morden town centre Regeneration Zone](#) are set out in the SDF.

Incorporating Green Infrastructure

5.1.29-5.1.28. Morden [town centre](#) already benefits from a number of large green spaces on its periphery. Connectivity can be improved between the town centre and the surrounding neighbourhoods and local parks, through establishing a network of green spaces that range in scale and form, to incorporate a variety of uses that cater for people of all ages.

5.1.30-5.1.29. The consultation responses indicate that while residents appreciate and frequently use the nearby parks, additional wayfinding features would help to promote these spaces to visitors. The addition of spaces, which include features such as benches and public seating areas, to enable rest and relaxation throughout the town centre, was also identified as a necessity.

5.1.31-5.1.30. Combined with a reduction in vehicular through traffic, [these green](#) spaces can reawaken the garden city principles which inspired the initial growth of Morden and prioritise people before the road network. Appropriate planting can enhance biodiversity, reduce noise, provide urban microclimate enhancements, improve air quality and provide delightful routes and soft landscaped areas. The orientation of buildings should maximise daylighting on these areas and reduce wind levels to encourage active travel and outdoor activities.

Tall buildings and sensitive edges

5.1.32-5.1.31. 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.

5.1.33-5.1.32. Tall buildings that meet the requirements in policy D512.6, are considered appropriate as part of the regeneration [to deliver optimised residential development and intensified use of on](#) 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.

5.1.34-5.1.33. [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.

5.1.35-5.1.34. 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 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.

5.1.35. 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.~~

5.1.36.

Creating a vibrant town centre

5.1.37. ~~Town centres are by definition where a range of different activities come together, which bring in a large number of people to work, live, shop and be entertained. In this policy, when the term 'town centre' is used, it is generically referring to the town centre as an location or area but when the term is written as 'Town Centre', it is referring to the glossary definition and the area designated as 'Town Centre' on the Policies Map and the related matters addressed in Policy 13.5. This mix of uses is what makes town centres special however, today it is more important that town centres trade on their strengths and unique identities in a more sustainable manner to compete with, and complement, other town centres. In addition to providing a vibrant range of services, town centres need to supplement and enhance this offer.~~

5.1.38. ~~Analysis of the town centre undertaken by Hawkins Brown for the SDF, indicates that 65% of all businesses in the district centre are small independents, with more than half of all premises being retail shops. Pop-up street surveys and discussions with members of the local community indicate that future desired uses in the town centre include night-life, restaurants, cafes and cultural events, with a general wish for more diversity and a variety of independent shops.~~

5.1.39. ~~The Morden Regeneration Zone Site Allocation Mo4 includes a large part of the Morden District Centre, as identified in the London Plan. While the existing retail units are heavily utilised, consultation responses have highlighted that the current mix of retail~~

~~does not meet the needs of the residents. 95% of respondents agreed that there is a need to provide more opportunities in Morden for the community to meet, socialise and make better use of their town centre through provision of attractive, safe and accessible public spaces and community, social, leisure and cultural facilities.~~

~~5.1.40. 96% of respondents also agree that the quantity and quality of commercial, residential and leisure uses should be improved in Morden, with a range of uses which are appropriate for a District Centre.~~

~~5.1.41-5.1.37.~~ Future development proposals in Morden [Town Centre and the Morden Regeneration Zone](#) should ~~therefore~~ respond to the needs of the residents, the daily users of the [town](#) centre, and those who pass through as commuters. This is essential to ensure that Morden [town centre](#) transforms into a place that people will want to visit as a destination. Proposed development in Morden [Town Centre and the Morden Regeneration Zone](#) should be of a flexible design to adapt to change over time and buildings should be designed for a long lifespan - being suitable for a number of uses over time. This is particularly relevant for commercial and retail premises in town centres.

~~5.1.42-5.1.38.~~ The creation of a resilient and exciting high street is key and it should be flexible enough to accommodate change in approaches to retail, leisure and working. With the traditional high street retailers affected by online trading, Morden [Town Centre and the Morden Regeneration Zone](#) must look to new uses that will enliven the high street and help to create a vibrant night time economy.

~~5.1.43-5.1.39.~~ The provision of new employment opportunities in [Morden Town Centre and the Morden Regeneration Zone](#)~~the centre~~ will also contribute to the economic sustainability of [the Morden area](#) as a whole, aligning with the Economic Development policy [Ee 7C13.1](#).

~~5.1.44-5.1.40.~~ As detailed in policy [Ee 7C 13.5](#), [the regeneration within the Morden town centre](#)[Regeneration Zone](#) will [introduce](#) changes with regards to the range of shops and other town centre and leisure uses but is unlikely to have a significant increase in the quantum of retail space to be provided.

~~5.1.45-5.1.41.~~ The new Morden Leisure Centre that opened in November 2018, is located less

than 1 mile to the south of the [site Morden Regeneration Zone](#) and ~~will provide~~^s modern leisure facilities for those who live and work in Morden. Morden Hall Park, to the east of the town centre also provides a variety of leisure, community and cultural facilities. The regeneration of the town centre provides an opportunity for improved linkages between the transport facilities and the [parks and leisure facilities](#).

~~5.1.46. Morden Road Clinic has also been identified by the NHS (National Health Service) as a site allocation (Mo5). As this site is located within the Wider Morden Town Centre Area, there may be an opportunity to relocate the health centre elsewhere within Morden town centre to provide a modern, fit for purpose facility that meets the needs of the future population.~~

Decentralised energy

~~5.1.47. In accordance with the London Plan [Policy SI2](#), all major developments, such as that proposed within the Morden Regeneration Zone, are expected to follow the energy hierarchy and associated targets to be net zero carbon. Refer to the Sustainable Design and Construction policies CC8.10–15 for further details on reducing energy use, maximising low carbon energy generation and standards on sustainable design and construction.~~

~~5.1.48. Decentralised energy is produced close to where it will be used and distributed by a network of underground pipes. We continue to explore how local heat and power can be generated and distributed around the borough using district heat networks.~~

~~5.1.49-5.1.42. Further investigative work will be required alongside the redevelopment of Morden town centre, to ensure that the technical details, viability and phasing is further explored and aligned as part of the comprehensive regeneration. [As detailed in Policy CC2.4, the Morden Regeneration Zone has been identified as a district heat network opportunity area and therefore further investigative work will be required as part of the plan-led approach to deliver the comprehensive regeneration within the Morden Regeneration Zone, to fully explore the technical and financial viability of a potential decentralised energy network.](#)~~

The [surrounding](#) Morden Neighbourhood

5.1.50-5.1.43. It is important to enhance ~~Morden's~~ [the](#) suburban character [of the surrounding Morden Neighbourhood](#) whilst also encouraging development and regeneration in appropriate and highly accessible locations in the borough. While the ~~central heart of~~ Morden [Regeneration Zone](#) has been identified as an appropriate location for intensified development, it is also essential to ensure that the surrounding suburban areas that lie within the Morden Neighbourhood, are respected for their low density, local suburban character and green spaces. Development at the perimeter of the Morden Regeneration Zone ~~and the Wider Morden Town Centre Area~~ are to be respectful of these sensitive edges, to ensure neighbouring occupiers are not unduly adversely affected, and that green and blue infrastructure links and active travel links are enhanced.

5.1.51-5.1.44. Morden underground is the start of the Northern Line underground service ~~provides~~ that provides a direct link into central London and to the rail network locally and beyond via connections at Balham, Battersea and London Waterloo and London Kings Cross. Morden Underground already attracts and has further potential to attract users from a wide catchment area, particularly from the surrounding suburban residential areas to the south, such as Cannon Hill, Lower Morden, St Helier and Sutton that are poorly served by public transport.

5.1.52-5.1.45. It is therefore vital that Morden [Town Centre](#) is well connected to the surrounding neighbourhoods and beyond by a network of safe and convenient pedestrian and cycle routes.

5.1.53-5.1.46. The on-street cycle stands in Morden [Town Centre](#) are already well used and it is important that these facilities are retained and enhanced as part of any public realm improvement. There is also a requirement for a covered, secure and high-quality cycle parking hub [as part of the delivery of the Morden Regeneration Zone](#) that will better support commuters and travellers to park their bicycles for longer periods.

5.1.54-5.1.47. Within the Morden Neighbourhood, areas such as Cannon Hill, St Helier and Lower Morden have parts that have poorer public transport accessibility and car dominance, which contributes to local congestion and air pollution. Where possible, and considering government's permitted development changes, we will work to protect and enhance local shopping facilities and key services and provide a good network of cycle and pedestrian routes in line with the 20-minute neighbourhood approach to ensure that householders have access to shops and services without the need to drive.

5.1.55-5.1.48. Residents value the verdant character of areas such as Merton Park, Cannon Hill, St Helier and Lower Morden that benefit from features such as grass verges, front gardens and street trees, which need to be protected and enhanced.

5.1.56-5.1.49. Improvements will be sought for the transition from residential to the predominantly industrial uses within the Garth Road Industrial Estate, to ensure that the suburban character of the Lower Morden area is conserved and enhanced.

Delivering **the Morden [Regeneration Zone \(Site Mo1\)](#)**

5.1.57-5.1.50. There is an opportunity to regenerate [a part of](#) Morden town centre, with Merton Council and TfL together owning, controlling and managing a large portion of land, properties and the public realm within the Morden Regeneration Zone ~~and the Wider Morden Town Centre Area~~.

5.1.58-5.1.51. Extensive due diligence has been jointly undertaken by Merton Council and TfL, including viability assessments, soft market testing, engineering and technical constraints, a Strategic Development Framework with associated capacity testing, a retail impact assessment and rights of light analysis. This work has tested a variety of development options to demonstrate that, with the assistance of grant and investment funding, the Morden Regeneration Zone Site Allocation (Mo41) can be delivered.

5.1.59-5.1.52. An appropriate land assembly strategy to facilitate the delivery of the comprehensive regeneration of Morden Regeneration Zone will need to be developed for this scheme which includes the possible use of compulsory purchase powers if considered necessary and appropriate.

5.1.60-5.1.53. The Morden regeneration scheme has long received cross party support within Merton Council and has been a key development aspiration for a number of years. The partnership between the council and TfL (since 2015) has strengthened the potential for

Morden to be [developed-regenerated](#) comprehensively. This is to ensure that widespread change occurs to provide additional benefits that would otherwise not transpire if development came forward on a fragmented basis.

5.1.61-5.1.54. Following on from the initial support by the GLA (Greater London Authority) in 2015, with the identification of Morden as one of London's Housing Zones and the inclusion of Morden town centre in an Opportunity Area in the London Plan 2021, the GLA continues to recognise its significance as a development opportunity that can assist Merton in delivering its housing targets.

5.1.62-5.1.55. Merton Council and TfL have agreed to procure a development partner to deliver the regeneration of [the](#) Morden Regeneration Zone in accordance with a plan-led approach.

5.1.63-5.1.56. The development is expected to be built out in a staged process to enable the town centre to function during any construction periods, to aid viability and to minimise the impact on the surrounding areas.

5.1.64-5.1.57. ~~The quantum and mix of affordable housing to be provided within each phase of development, will be an integral part of a scheme design and will be prepared in accordance with national, London-wide and local policy and guidance. A mechanism will be required to ensure that viability is kept under review.~~

[As identified in the Infrastructure Delivery Plan 2021, the comprehensive regeneration of the Morden Regeneration Zone is likely to trigger the need for additional health infrastructure to meet local needs.](#) Morden Road Clinic has also been identified by the NHS (National Health Service) as a site allocation (Mo5). ~~As this site is located within the Wider Morden Town Centre Area, there~~[There](#) may be an opportunity to relocate the health centre elsewhere within [the](#) Morden [Regeneration Zone](#) to provide a modern, fit for purpose facility that meets the needs of the future population.

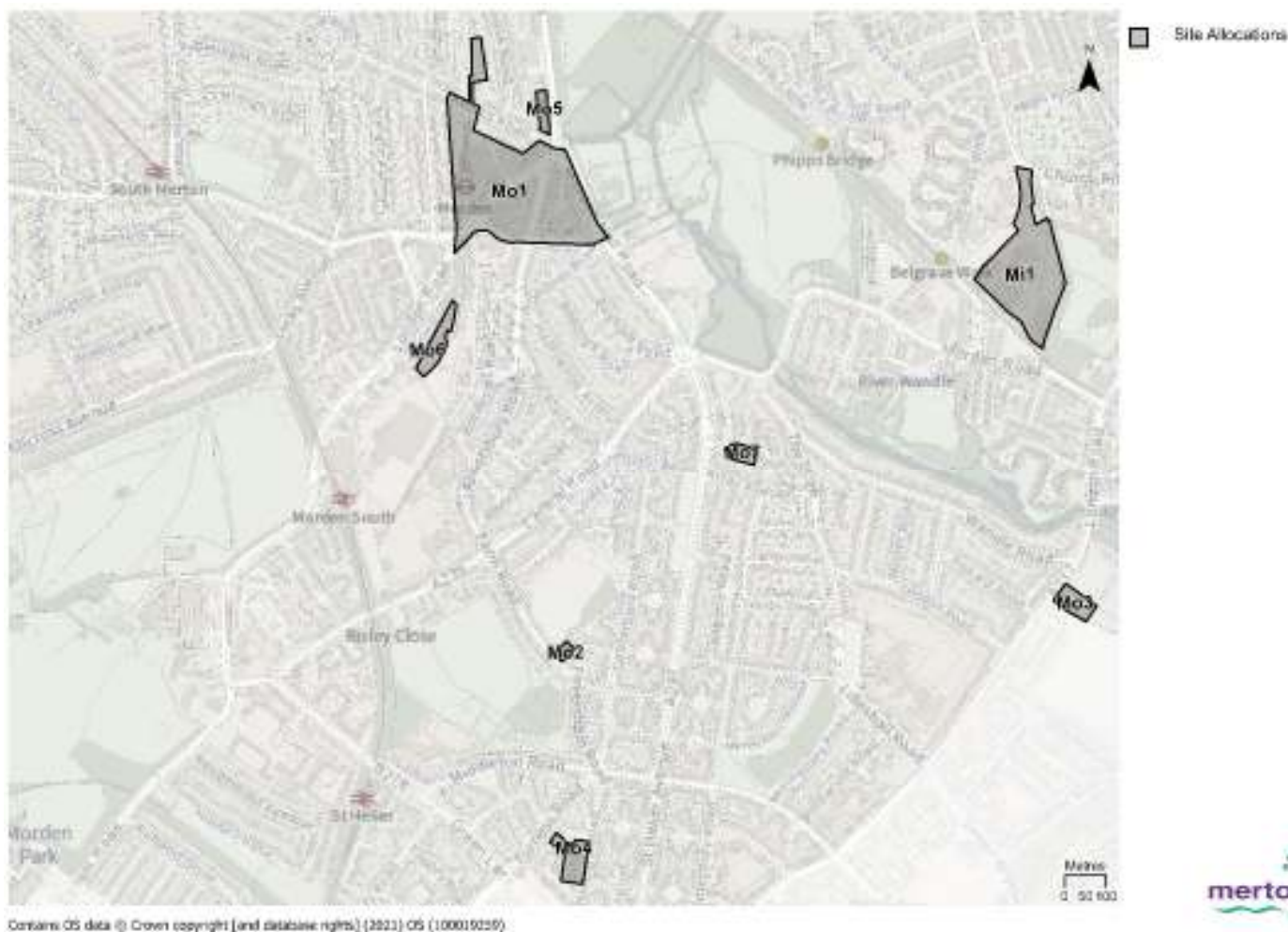
5.1.65-5.1.58. Planning obligations (also known as Section 106 agreements) and Community Infrastructure Levy (CIL) will be used to mitigate the impact of development and to ensure the delivery of key infrastructure.

SITE ALLOCATIONS

Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocation^s will be determined against planning policies (including the London Plan).

[\(Renumbered the site allocations to match each detailed site allocation\)](#)



SITE Mo1Mo4: Chaucer Centre Canterbury Road, Morden, SM4 6PX

[\(Change site reference number on map\)](#)



Ward: St Helier
Site description: The Chaucer Centre is a two-storey building used as a venue for training, meetings and conferences, for council staff and the Merton Music Foundation. North of the site is the Smart Centre, which is an education facility and a former nursery school building. The site is surrounded by two storey terraced houses. Access to the site is obtained from Canterbury Road.
Site owner: Merton Council
Site area: 0.63 ha
Existing uses: Training, meeting and conference centre.
Site allocation: Mixed-use residential and community uses such as clinics, health centres, crèches, day nurseries, day centre or solely residential, subject to the existing training facility being provided on a suitable site elsewhere within the borough.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 35 -65 new homes.
Design and accessibility guidance:

In a mixed-use development, residential uses should be on upper floors. A mix of uses including residential will help the provision of modern community facilities on lower floors and create a more secure environment helping to minimise vandalism and crime.

We will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. The site is in an area identified as being deficient in access to public open space.

We will require on site provision in accordance with the infrastructure policies and London Plan. [This site is an area](#)—~~rea~~ identified as being deficient in access to children’s play space for ages 0-4 years.

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys. Development proposals will need to maximise the potential to access the site by sustainable travel modes and mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Development proposals must protect and not unduly harm the residential amenity of those properties next to or in the vicinity of the site.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area on portions of the north and west of the site.

Infrastructure Requirements:

Development proposals for this site must ~~refer have regard to the Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal and Green Infrastructure Study 2020.~~

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

SES Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer engage with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with SES Water with any submitted planning application. Merton Council will also, engage with and seek from SES Water about the development of this site.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of liaising with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.

No

Impacts a Conservation Area

No

Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mo2: Farm Road Church, Farm Road, Morden, SM4 6RA



Ward: St Helier
Site description: The site is located on the corner of Combermere Road and Farm Road, with frontage onto both streets. To the northwest of the site is Merton College Playing Fields and The Cottage associated with it. To the northeast of the site are the terraced houses at Combermere Road. The surrounding area consists of two storey terraced housing built in the 1920s and 1930s.
Site owner: Merton Council
Site area: 0.12ha
Existing uses: Former church (unused for approx. 7-8 years) and associated building: vacant.
Site allocation: Residential.
Site Deliverability: 0-5 years.
Indicative site capacity (new homes): 14- 18 new homes.
Design and accessibility guidance: Development of the site provides an opportunity to supply new homes by bringing back this under used brownfield site and create new active frontages along Farm Road and Combermere Road. Development proposals will need to protect and not unduly harm the amenity of neighbouring residential occupiers and the character of the area.

Proposals must mitigate and manage the impacts of parking on the neighbourhood and the local amenity.

On 16 July 2020 Merton's Planning Applications Committee resolved to grant planning permission for the development of 18 homes on the site, subject to the completion of an enabling agreement and conditions.

Infrastructure Requirements:

Development proposals for this site must ~~refer have regard~~ to ~~the~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to nature. We will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

SES (Sutton and East Surrey) Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer liaise with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of liaising with SES Water with any submitted planning application. Merton Council will also, liaise and seek from SES Water about the development of this site.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes. The site adjoins the former Merton College Playing Fields and is near to the Morden Recreation Ground.
Impact on ecology designation	Yes. The southern part of the site is close to Site of Natural Conservation (SINC) and a Green Corridor.

Public Transport Accessibility Level
(PTAL)

PTAL 1a to 2, poor access to public transport.

SITE Mo3: Imperial Sports Ground Tooting and Mitcham Hub, Bishopsford Road, Morden, SM4 6BF.



Ward: Ravensbury

Site description:

The site is a slightly raised field with road frontage onto Bishopsford Road (A217). To the northeast of the site are the artificial grass pitches associated of the Tooting and Mitcham Football Club and other associated pitches and sports buildings. South of the site is Poulter Park and along the southwest boundary of the site, which is also the borough boundary with the London Borough of Sutton, is a vehicle access road to Poulter Park and the dwellings within Bishopsford House, and beyond the road are the rear gardens of dwellings on Hillfield Avenue.

Site owner: Tooting and Mitcham Sports and Leisure Ltd.

Site area: 0.47ha

Existing uses: Field

Site allocation: Intensification of sporting activity on the wider Tooting and Mitcham Hub site may be supported by enabling development on this site subject to meeting planning policy, evidence and consultation. Any enabling development would be expected to directly fund long term capital investment in sporting facilities on Tooting and Mitcham Hub.

Site deliverability: 0-5 years.

Indicative site capacity (new homes): 60-77 new homes.

Design and accessibility guidance:

~~To be considered as enabling development for the Tooting and Mitcham Hub, any proposals for residential development would be expected to clearly prove how and when they would directly deliver capital investment in Tooting and Mitcham Hub's sporting provision. This could be by considering both in a single planning application with a single legal agreement to secure the enabling investment.~~

~~Due to the nature of this site, a high-quality design will be needed to complement the sensitive setting. Development proposals need to be designed to minimise their impact on the openness of the Metropolitan Open Land and to enhance the nature conservation value of the green corridor.~~

~~As an Agent of Change, the enabling residential development needs to be designed and built to minimise the impact for new occupiers, and to ensure that the established noise generating sporting venues are still viable and can continue and/or grow without unreasonable restrictions being placed on them.~~

~~Potential parking, traffic and road safety impacts on neighbouring streets and local amenity, will need to be mitigated.~~

~~Proposals that include residential dwellings, which is defined as More Vulnerable development, would only be allowed in Flood Zone 3 (along the northern edge of the site) where it can be demonstrated that the Exception Test is satisfied:~~

- ~~1. that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk,~~
- ~~2. that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.~~

~~To satisfy the requirements of the Exception Test and to mitigate the flood risk, development proposals need to incorporate the recommendations in Merton's Strategic Flood Risk Assessment.~~

~~On 20 August 2020, Merton's Planning Applications Committee resolved to grant planning permission for the development of 77 homes on the site, subject to the completion of a S106 legal agreement and conditions. This application is considered to be of potential strategic importance and therefore, as part of Stage 2 of the referral process, the Mayor of London now has to make a decision to allow the Planning Applications Committee decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority.~~

Infrastructure Requirements:

~~Development proposals for this site must refer have regard to the Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.~~

~~The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.~~

~~Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.~~

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the wastewater network infrastructure but does not envisage any infrastructure concerns about the water supply network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location-

Impacts Listed Buildings or undesignated heritage assets-	No-
Impacts a Conservation Area-	No-
Impacts an Archaeological Priority Area-	No-
Impacts a Scheduled Ancient Monument-	No-
Impacts on flooding from all sources-	Yes, northern edge of the site in Flood Zone 3a. The centre of the site is susceptible to surface water flooding-
Is in a town centre-	No-
Is in an Opportunity Area-	No-
Impacts a designated open space-	Yes, the site is designated as protected open space and Metropolitan Open Land (MOL). Poulter Park, to the south of the site, is also designated as MOL in Sutton's Local Plan. The site is within the Wandle Valley Regional Park and the 400m buffer area-
Impacts on ecology designation-	Yes, within a designated Green Corridor and near to a Site of Importance for Nature Conservation (SINC)-
Public Transport Accessibility Level (PTAL)-	PTAL 1, very poor access to public transport.

Site Mo4Mo1: Morden Regeneration Zone[\(Change site reference number on map\)](#)**Ward:** Merton Park, Ravensbury and St Helier.**Site description:** The site (regeneration zone) includes:

- Kenley Road carpark.
- Morden underground station and bus interchange.
- London Underground Limited (LUL) staff car park and operating facilities to the rear of the underground station.
- Morden station car park.
- Retail, office, commercial and community uses along London Road, Aberconway Road and Abbotsbury Road.
- Residential flats and houses along London Road, Aberconway Road, Abbotsbury Road and Morden Hall Road.
- Public and adopted highway; - Public realm, footways and public access ways; and
- Light industrial uses off Morden Hall Road.

The ground floor of the Morden underground station is a locally listed building.

The proposed site is surrounded by the open spaces of Morden Hall Park to the east and Kendor Gardens to the north, 2 storey residential and commercial uses to the south, north and west and the 15-storey Merton Civic Centre to the south-west.

Site owner: Multiple landowners including Transport for London, Merton Council and private owners.**Site area:** 8.4ha

Existing uses: A mixture of ~~town~~ ~~centre~~ ~~type~~ ~~uses~~, including retail, office, light industrial, transport infrastructure, public realm, residential, community and leisure and sui generis uses.

Site allocation: Mixed retail, office, commercial (including restaurants/cafes), community use (including health centre), transport infrastructure, public realm and residential.

Site deliverability: Commencement within 5-10 years and delivery in phases within the 5-10 and 10-15 years periods.

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.

While the Morden Regeneration Zone is an individual site allocation, there are also other development opportunities in the Wider Morden Town Centre Area within its proximity, including the following site allocations: Morden Road Clinic (Mo5) and York Close Car Park (Mo6). The Morden Regeneration Zone could be considered for redevelopment in conjunction with other sites in Morden.

Design and accessibility guidance: *Please note this is not a definitive list of issues for this site.*

All proposals within the Morden Regeneration Zone are expected to support the above vision and to assist with the delivery of comprehensive regeneration, which realises the full potential of this highly accessible town centre site.

Due to the fragmented nature of the ownership of the land, the proposals will need to include a land assembly strategy to facilitate the optimal development at this site, which may involve the use of CPO (Compulsory Purchase Order) powers if considered necessary and appropriate.

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.

Development proposals will have to conserve and where appropriate, enhance the local [Heritage Assets](#), and promote or reinforce the local distinctive character of the surrounding areas.

Development proposals need to include a healthy, accessible public realm that will also deliver air quality improvements. ~~Proposals therefore need to provide a high-quality public realm outside the underground station.~~ Proposals needs to include:

- [high-quality public realm outside the underground station](#)
- suitable alternative bus standing and stopping facilities;
- high quality pedestrian and cycle routes that link to the ~~wider~~ suburban [surrounding Morden Neighbourhoods](#)
- cycle storage including a high quality, conveniently located and publicly accessible cycle hub that provides secure, covered cycle storage for travellers and commuters;
- appropriately managed and sustainable car parking, freight delivery and traffic flow solutions.

The comprehensive regeneration of this site will allow for innovative large-scale energy saving approaches and technologies to deliver a net-zero carbon development.

We will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. Part of this site is located in an area identified as being deficient in access to public open space

We will require on-site provision of play space in accordance with the infrastructure policies and London Plan. This site is an area identified as being deficient in access to children's play space for ages 0-4 years.

Infrastructure Requirements:

Development proposals for this site must ~~refer have regard~~ to ~~the~~ Merton's Infrastructure Delivery Plan [2021 and ensure infrastructure requirements have been addressed by the proposal](#) ~~and Green Infrastructure Study 2020.~~

Developers should engage at an early stage with the owners of the Morden Road Clinic and Morden Hall Medical Centre (Site Mo5), as the Morden Regeneration Zone development is likely to trigger a need for a health infrastructure contribution whilst also presenting an opportunity for the delivery of a modern replacement medical facility within Morden Regeneration Zone boundary.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the water supply, water treatment and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development (s) of this site.

The site is close to the A24 which forms part of the Transport of London Road Network. Transport for London requests no new access or servicing take place from the A24. The London Underground operational assets will need to be safeguarded, with scope for the potential consolidation of uses/facilities to allow for a more efficient use of the site. We will require evidence that the developer has engaged with London Underground, to be submitted with any planning application for the site.

The developer will need to engage with TfL to provide suitable alternative bus stand and bus stop facilities. [Where appropriate, development proposals may be required to make financial contributions towards the delivery of these facilities, in the form of planning obligations](#)

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.](#)

Impacts Listed Buildings or undesignated heritage assets.

Yes. The original ground level element of the Morden underground station building is locally listed and along the eastern boundary of the site is Morden Hall Park, which is a registered Historic Park and Garden and holds many locally and statutory listed buildings, walls and other structures.

Impacts a Conservation Area

Yes, parts of Morden Hall Road and Aberconway Road that are within the site boundary, are within the Wandle Valley Conservation Area and Morden Park is the nearest part (~600m) of the Upper Morden Conservation Area.

Impacts an Archaeological Priority Area

Yes, a part of the site is within the Stane Street Tier 2 Archaeological Priority Area.

Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, some parts of the site are susceptible for groundwater and surface water flooding.
Is in a town centre.	Yes, a substantial part of the site is within Morden District Town Centre.
Is in an Opportunity Area	Yes.
Impacts a designated open space.	Adjacent to Open Space, Metropolitan Open Land, Site of Importance for Nature Conservation, Green Corridor and is within 400m of the Wandle Valley Regional Park. Yes, north western boundary, the site adjoins the Kendor Gardens Open Space and the Morden Regeneration Zone is in the Wandle Valley Regional Park.
Impact on an ecology designation	Morden Hall Park, to the east of the site, is designated as: Metropolitan Open Land (MOL), Site of Importance for Nature Conservation (SINC), Green Corridor
Public Transport Accessibility Level (PTAL)	Most of the site is PTAL 6a and a small part at the northern end of the site is rated PTAL 5.

SITE Mo5: Morden Road Clinic and Morden Hall Medical Centre Morden Road, Morden, SW19 3DA.



Ward: Merton Park
Site description: The site, occupied by a GP practice and pharmacy consists of a part single and part two-storey building fronting Morden Road (A24) and is surrounded to the north, south and west by single and two storey houses. To the south of the site is also a two-storey building consisting of a commercial unit and a dwelling. To the east, on the opposite side of Morden Road, is Morden Hall Park.
Site owner: NHS Property Services and private ownership
Site area: 0.24ha
Existing uses: Primary NHS healthcare including pharmacy.
Site allocation: Healthcare led mixed-use scheme with residential or solely residential if an NHS primary healthcare facility with similar or greater capacity is provided within Morden town centre.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 38 -54 new homes.
Design and accessibility guidance: The development of this site to provide additional healthcare capacity and/or housing would depend on the additional needs assessed and funding provided from the redevelopment of other sites within

Morden town centre. Its redevelopment is therefore linked with the regeneration of Morden town centre.

Development proposals must be sensitive to the residential properties next to and in the vicinity of the site and the potential impact on the local Heritage Assets, i.e., the Wandle Valley Conservation Area, Morden Hall Park and the Stane Street Tier II Archaeological Priority Area.

Mitigation measures for potential parking, traffic and road safety impacts on neighbouring streets and local amenity, must be part of any development proposal.

Infrastructure Requirements:

Development proposals for this site must ~~refer have regard to the~~ Merton's Infrastructure Delivery Plan ~~2021 and ensure infrastructure requirements have been addressed by the proposal. and Green Infrastructure Study 2020.~~

[Development proposals will need to demonstrate that clinical capacity will be maintained for residents during the redevelopment of this site.](#)

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, we strongly recommend that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.

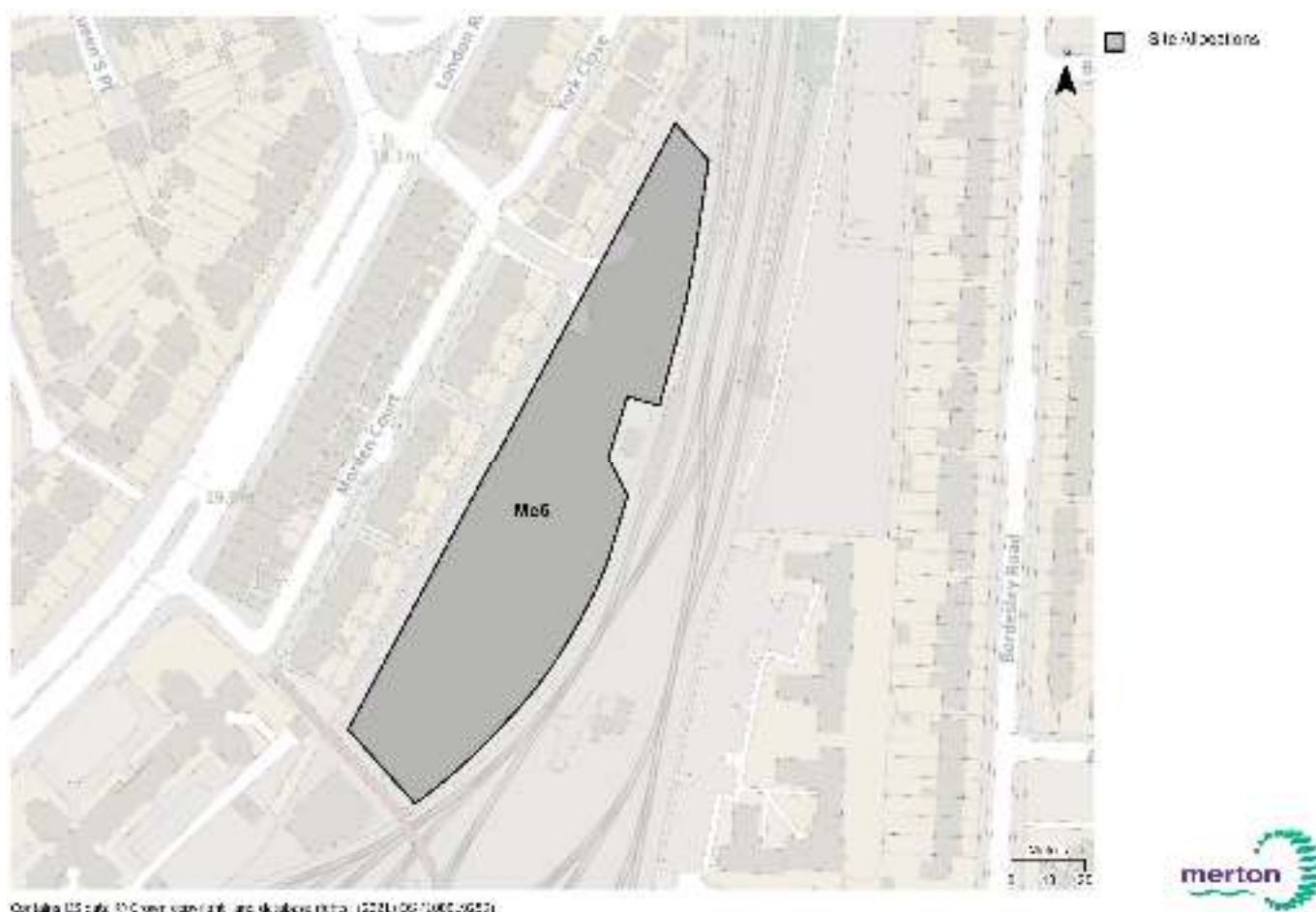
The site is close to the A24 which forms part of the Transport for London Road Network (LTRN)- .no new access or servicing should take place from the A24.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Morden Hall Park, which includes historic buildings to the east of the site, is also registered Historic Park and Garden (Grade II)
Impacts a Conservation Area	Yes, adjacent to the Wandle Valley Conservation Area.
Impacts an Archaeological Priority Area	Yes,
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	Surrounding area is susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	Yes
Impacts a designated open space.	No

Impacts on ecology designation.	Yes, the nearby Morden Hall Park is also designated as Metropolitan Open Land, Green Corridor and a Site of Importance for Nature Conservation.
Public Transport Accessibility Level (PTAL)	PTAL ranging from 5 – 6a very good to excellent access to public transport.

Site Mo6: York Close Car Park Morden, SM4



Ward: Merton Park
Site description: This site is an open surface level pay and display car park with a single access point via Morden Court. To the west of the site are two-storey residential buildings along Morden Court and York Close and to the east is the Morden underground railway depot.
Site owner: Transport for London (London Borough of Merton Leasehold).
Site area: 0.66ha
Existing uses: Car Park.
Site allocation: Parking and residential or solely residential, if not needed for parking
Site deliverability: 5- 10years.
Indicative site capacity (new homes): 35 – 45 new homes.
Design and accessibility guidance: The site to contribute to the vision of Morden Town centre regeneration plan. The potential impacts of displaced commuter parking on neighbouring streets and local amenity needs to be addressed as part of any development proposals.

Development proposals will need to be sensitive to the residential amenity of the existing neighbouring dwellings and the occupiers of any new dwellings, (as in line with the Agent of Change principles set out in the London Plan), not harm the viability and growth of the adjacent train depot and must incorporate suitable mitigation measures to address the critical drainage issues.

We will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. This site is an area identified as being deficient in access to public open space

We will require on site provision in accordance with the infrastructure policies and London Plan. The site is in an area identified as being deficient in access to children’s play space for ages 5-11 years and 0-4 years.

Infrastructure Requirements:

Development proposals for this site must ~~refer have regard~~ to the Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

SES Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer engage with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with SES Water with any submitted planning application. Merton Council will also, engage with and seek from SES Water about the development of this site.

Thames Water does not envisage infrastructure concerns about the wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, we strongly recommend that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	A small part of the site, at the north eastern boundary, is within a Critical Drainage Area.
Is in a town centre.	No
Is in an Opportunity Area	Yes
Impacts a designated open space.	No

Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 5 very good access to public transport.

Site Mo7: Gifford House, 67c St Helier Ave, Morden SM4 6HY



Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)

Ward: Ravensbury

Site description: A part-one and part-two storey office building that is set behind (to the east) of the part-three and four storey buildings fronting St Helier Avenue. All the neighbouring properties, to the north, east and south, consist of two storey residential buildings. The site gains access from Connaught Gardens.

Site owner: Merton Council

Site area: 0.27ha

Existing uses: Office

Site allocation: Residential

Site deliverability: 5-10 years.

Indicative site capacity (new homes): 20- 25 new homes.

Design and accessibility guidance:

Development proposals must protect and not unduly harm the residential amenity of the neighbouring properties.

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys. Development proposals will need to maximise the potential to access the site by sustainable

travel modes and mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

The site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. We will require on site playspace provision in accordance with the infrastructure policies and London Plan.

Infrastructure Requirements:

Development proposals for this site must ~~refer~~have regard to ~~the~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

SES Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer engage with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with SES Water with any submitted planning application. Merton Council will also, engage with and seek from SES Water about the development of this site.

Thames Water does not envisage infrastructure concerns about the wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, we strongly recommend that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.

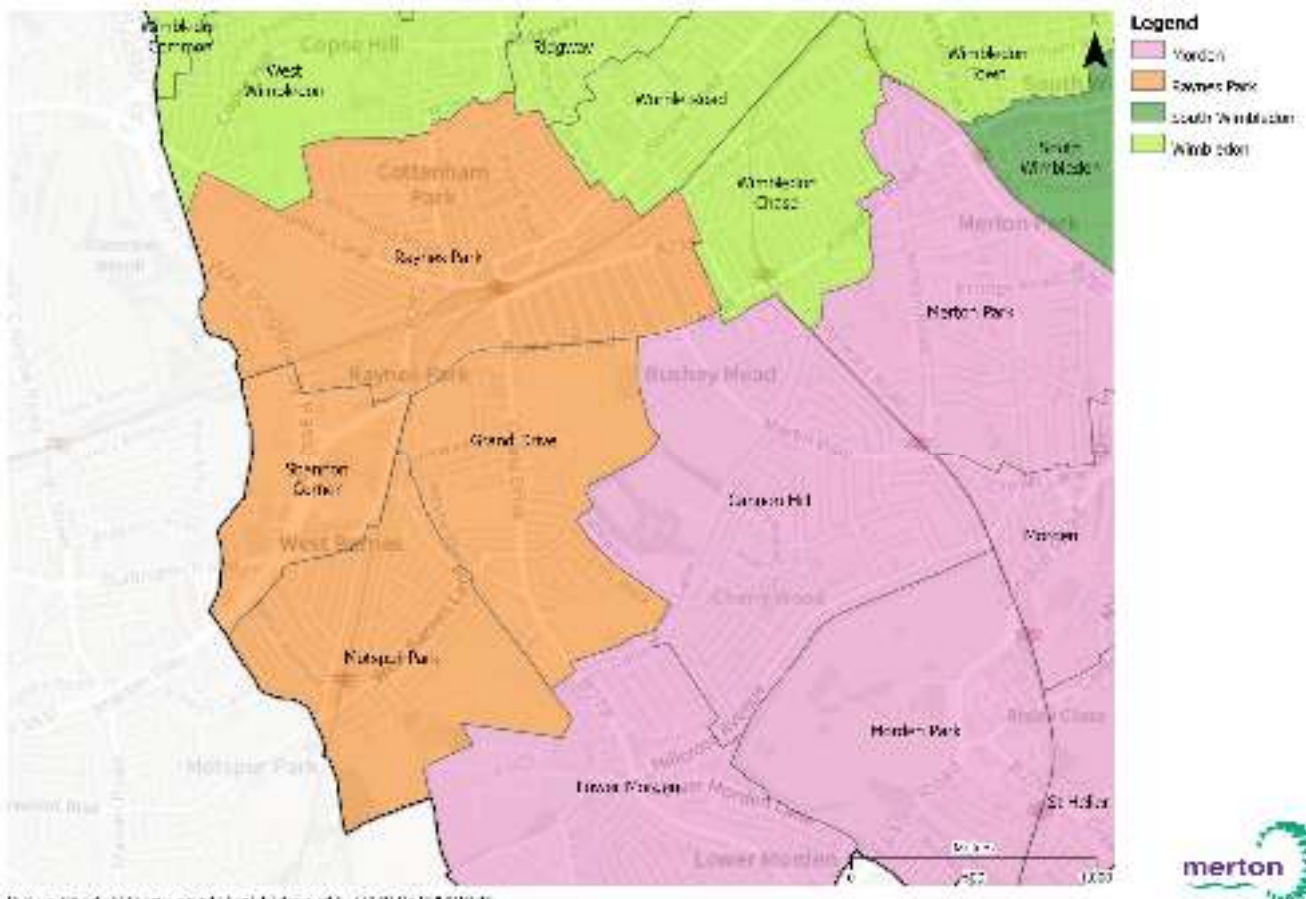
The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.



CHAPTER 06. RAYNES PARK



Contains OS data © Crown copyright and database right (2021) 64143/24/24

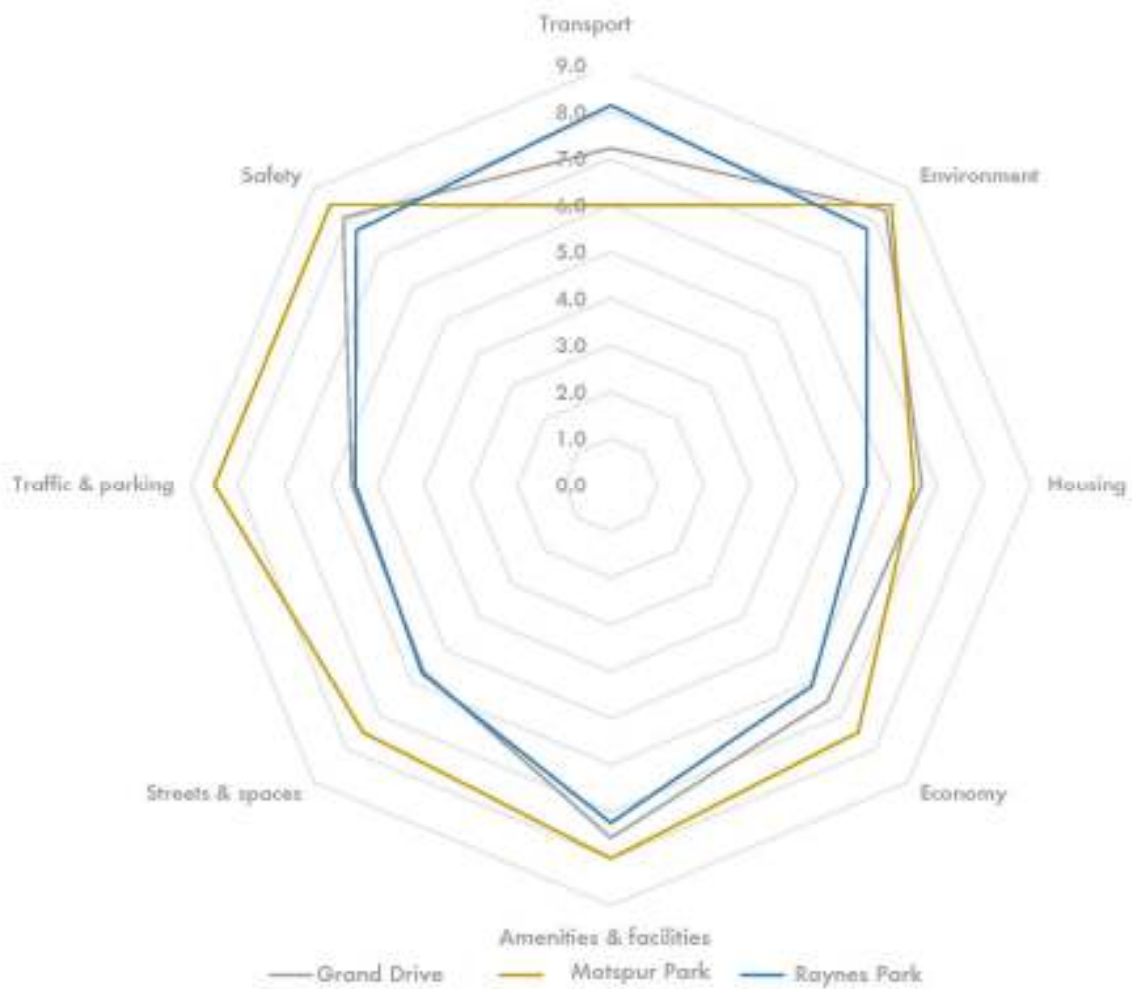


Contains OS data © Crown copyright and database right (2021) 64143/24/24



PLACE PROFILE: RAYNES PARK

As part of the borough’s ongoing Character Study, 415 Merton residents took part in an online public survey, of which 34 people lived in Raynes Park. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform [Merton’s Borough Character Study 2021](#).



Results from residents of Raynes Park rating their neighbourhood

KEY OBJECTIVES: RAYNES PARK

The following objectives provide an overarching vision for Raynes Park.



Celebrating Raynes Park's unique character

Future developments will respect the local character and amenity.



Improving active travel

Securing transport improvements for pedestrians and cyclists and improve public transport facilities and connections.



Complement the town Centre.

Create a complementary offer at Shannon Corner where new residents can boost spending power in Raynes Park town centre and new businesses can benefit from the proximity to the strategic road network.

CHARACTER: RAYNES PARK

These photos illustrate the diverse character found across Raynes Park.





RAYNES PARK: POLICY N6.1

This policy supports investment in Raynes Park to maintain its position as an attractive and interesting destination that meets the needs of the current and future residents, businesses and visitors, and provides economic, social and environmental benefits.

Raynes Park Local Centre

To improve the quality of the environment and make it easier for people to move around Raynes Park Local Centre and around the wider neighbourhood.

We will do this by:

- a. Supporting development in Raynes Park Local Centre that provides for the needs of the local community, including a wide range of businesses and services commensurate to the town centre.
- b. Supporting the 20-minute neighbourhood approach by resisting the loss of shops and services within Raynes Park Local Centre, .
- c. Ensuring that Raynes Park is maintained as a viable, attractive town centre for businesses to locate and residents to visit; supporting shop front improvements and parking for bikes and scooter deliveries that is designed well into the street scene while meeting the needs of businesses.
- d. Requiring development within and around the centre to address flooding issues particularly from surface water, prioritising sustainable drainage systems that are both effective and attractive.
- e. Securing well-designed and well linked improvements for pedestrians and cyclists and improved access to public transport facilities, including support for step-free access and improved secure cycle parking facilities at Raynes Park station.

-
- f. In the long term, work with Network Rail Crossrail 2 and the local community to ensure the benefits arising from its investment are realised, that new structures are sensitively designed and compliment the wider residential area and that disruption is kept to a minimum.

Surrounding area of Raynes Park Local Centre

- g. Taking the Healthy Streets Approach by support better pedestrian and cycle links between Raynes Park town centre and the surrounding areas including Shannon Corner and, between the shops and services around Shannon Corner.
- h. Optimise land use by providing new homes above shops and other business premises, for example at Wimbledon Chase and Shannon Corner, where these can be sited and designed to minimise air and noise pollution for new residents.
- i. Businesses will be encouraged to locate at Shannon Corner where they could benefit from proximity to the strategic road network, not compete with nearby town centres or generate significant private car trips.
- j. Supporting the 20 minute neighbourhood approach by supporting shopfront, public realm and street scene improvements and maintaining the day-to-day shopping and other services at Motspur Park. and Wimbledon Chase.
- k. Integrating improvements within the public realm: ensuring developments and streets are designed to improve walking and cycling, provide attractive raingardens, pocket parks and other attractive and effective sustainable drainage systems to mitigate the risk of surface water flooding.
- l. Supporting attractive, accessible local parades and neighbourhoods including step-free access at Motspur Park and Raynes Park Wimbledon Chase stations.
- m. Requiring development to respect local character, heritage and amenity in surrounding residential neighbourhoods.

JUSTIFICATION SUPPORTING TEXT

- 6.1.1.** Raynes Park is an attractive local town centre well served by a mainline train station set within a relatively affluent high quality suburban neighbourhood immediately surrounding the town centre. To the south lies Motspur Park, a smaller local town centre also served by a mainline station and set within the largely residential neighbourhood West Barnes. Kingston Road and Bushey Road lead from the shops and services adjacent Wimbledon Chase station bisecting Raynes Park and West Barnes and onto the A3 road.
- 6.1.2.** Raynes Park Local Centre will be maintained to ensure it continues to be an attractive and viable location for shops and services commensurate with its status as a Local Centre.
- 6.1.3.** To help support local shops, restaurants and cafés during the day we will ensure that some business function is maintained in the Local Centre, such as small and medium offices and other activities, and resist the loss of existing employment uses. A reliance on the commuter trade is not enough to maintain a variety of quality services.
- 6.1.4.** We will complement initiatives started by the Raynes Park Local Centre Enhancement Plan. The enhancement plan guides short to medium term investment in the physical environment that residents and businesses have said are important to Raynes Park. It focuses on:
- improving access and circulation for pedestrians, cyclists, road traffic and public transport users.
 - strengthening Raynes Park's retail offer, making it a more attractive destination for local shopping needs; and,
 - improving the physical environment, appearance and maintenance of the public realm.

-
- 6.1.5.** The enhancement plan also identifies the development opportunities and planning status of sites within the town centre. Although, the centre has a high PTAL and the redevelopment of redundant sites is welcome, there is a desire to protect the scale and local character of Raynes Park. New development coming forward within and around the centre must reinforce the character of the centre, respect the low scale residential hinterland including Conservation Areas to the north and acknowledge the strategic views across the borough from higher land to the north.
- 6.1.6.** The changing nature of the way we access shops and services has led to a far greater demand for – and greater business reliance on – home deliveries by bike and scooter. Delivery drivers need to park close to high street shops, restaurants, cafes and other services for the apps to recognise that they are available for the business to deliver their produce, which is increasingly important if the restaurant or shop is to remain viable. We will seek to provide well-designed parking for delivery bikes and scooters on the high street to boost business viability while also meeting the needs of pedestrians and other town centre users.
- 6.1.7.** Raynes Park’s share of Merton’s new homes will be provided on some larger sites closer to Shannon Corner and incremental residential development within surrounding neighbourhoods, such as intensification of existing sites through redevelopment and/or conversion of existing single dwellings into multiple units.
- 6.1.8.** The Strategic Flood Risk Assessment identified the potential for flooding over parts of Raynes Park Local Centre and more so to the south around Shannon Corner/Beverley Way. Flooding in Raynes Park local centre itself is attributed to surface water. Flooding at Shannon Corner/Beverley Way is attributed to fluvial flooding of Beverley Brook. Development in these areas should comply with most recent Environment Agency advice and flood risk management policies. In particular development should incorporate sustainable drainage solutions to help manage surface water flood risk. Where sustainable drainage systems are visible to the public, those that are attractive and have other environmental benefits should be prioritised.

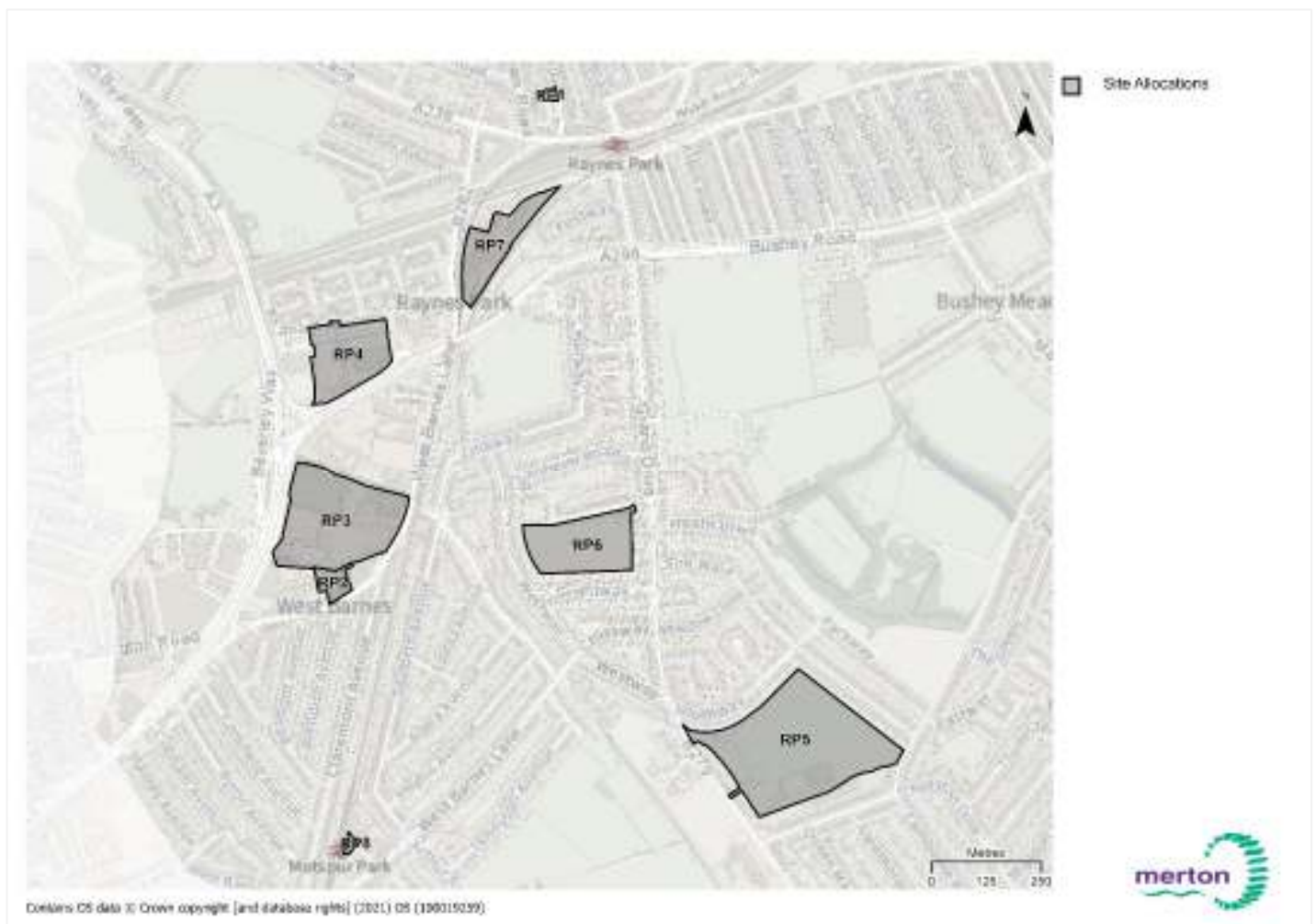
- 6.1.9. The area around Shannon corner has a large out-of-centre retail presence on many sites, including a large supermarket and bulky goods warehouse. The area is very poorly served by public transport, has large amounts of on-site free car parking, excellent links to the road network and a retail offer focused on bulky goods. As a result, it displays extremely unattractive local environment and attracts shoppers almost exclusively by car.
- 6.1.10. The changing nature of consumer behaviour has reduced the demand for retail sheds and the Council does not support further significant out -of-centre retail development at Shannon Corner. Many of these large sites will be suitable for new homes where these are sensitively designed to improve the setting and public realm, improve links to the town centre and transport hubs and mitigate the impacts of flood risk, poor air quality and traffic noise and provide the necessary infrastructure to support new homes.
- 6.1.11. Motspur Park Local Centre has a mainline train station, surrounded by residential neighbourhoods which merge into the neighbouring boroughs of Sutton and Kingston-upon-Thames. It provides grocery and other facilities that cater for the day-to-day needs of residents. We will continue to support environmental improvements and the convenience nature of the centre.
- 6.1.12. As set out in the Good Growth chapter of this Local Plan, ~~Wimbledon Chase and Raynes Park~~ and Motspur Park will be supported to be 20-minute neighbourhoods. ~~Wimbledon Chase Neighbourhood Parade is served by a rail station but could benefit from environmental improvements.~~ Transport improvements for the ~~Wimbledon Chase and~~ Motspur Park areas ~~have~~ has already been identified, including provision of better facilities for buses, pedestrians and cyclists, with planting to improve the quality of the environment. We will continue to lobby for step free access to Motspur Park and Raynes Park and Wimbledon Chase train stations so that all residents can make equal and effective use of their local station.
- 6.1.13. The suburban neighbourhoods within the neighbourhoods will be ~~conserved and~~ enhanced by ensuring that new development respects local character and amenity, and where appropriate conserves historic value.

-
- 6.1.14.** Outside this Local Plan period, in the long term investment in Crossrail 2 could transform Raynes Park and Motspur Park local town centres. However, at this stage **it is likely that** Crossrail 2 will not be completed **much** prior to 2040, outside the lifetime of this Local Plan. In their consultation response to this Local Plan, Transport for London confirmed that Crossrail2 safeguarding directions will be revised to safeguard the latest proposed route. At the time of writing (~~June~~ **November** 2021) no safeguarding directions exist for the Crossrail2 route for Raynes Park and Motspur Park.
- 6.1.15.** In the event that planning for Crossrail2 continues, we will work with Transport for London, Network Rail and others to ensure the best outcome from Crossrail 2 for Raynes Park and Motspur Park stations and that the potential disruption and severance at level crossings in the surrounding area is minimised as far as possible. As with Wimbledon, we want to ensure Raynes Park, Mostpur Park and West Barnes remain open for business and disruption is minimised during Crossrail 2's development. While Crossrail 2 remains at the planning stage, we will continue to seek greater investment in all stations and surrounds, particularly step free access which will remove the barrier that currently exists for public transport access to all sections of the community

SITE ALLOCATIONS

Site allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocations will be determined against planning polices (including the London Plan).



SITE RP1: Amity Grove Clinic, Amity Grove, Raynes Park, SW20 0LQ.



Ward: Raynes Park
Site description: The site consists of a part single and part two storey building, which is surrounded by two and three storey houses. Along the northern boundary is a narrow public access footpath linking Amity Grove and Durham Road.
Site owner: National Health Service (NHS).
Site area: 0.09ha
Existing uses: Former medical clinic.
Site allocation: Residential (former health services have now re-located to Nelson Medical Centre).
Site deliverability: 5-10 years.
Indicative site capacity: 5-10 new homes.
Design and accessibility guidance: Development proposals should protect and improve the public footpath which borders the site to the North. Mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Protect the residential amenity of those properties next to, or in the vicinity of the site.

Development proposals must have regard to the recommendations in Merton’s Strategic Flood Risk Assessment.

Infrastructure requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

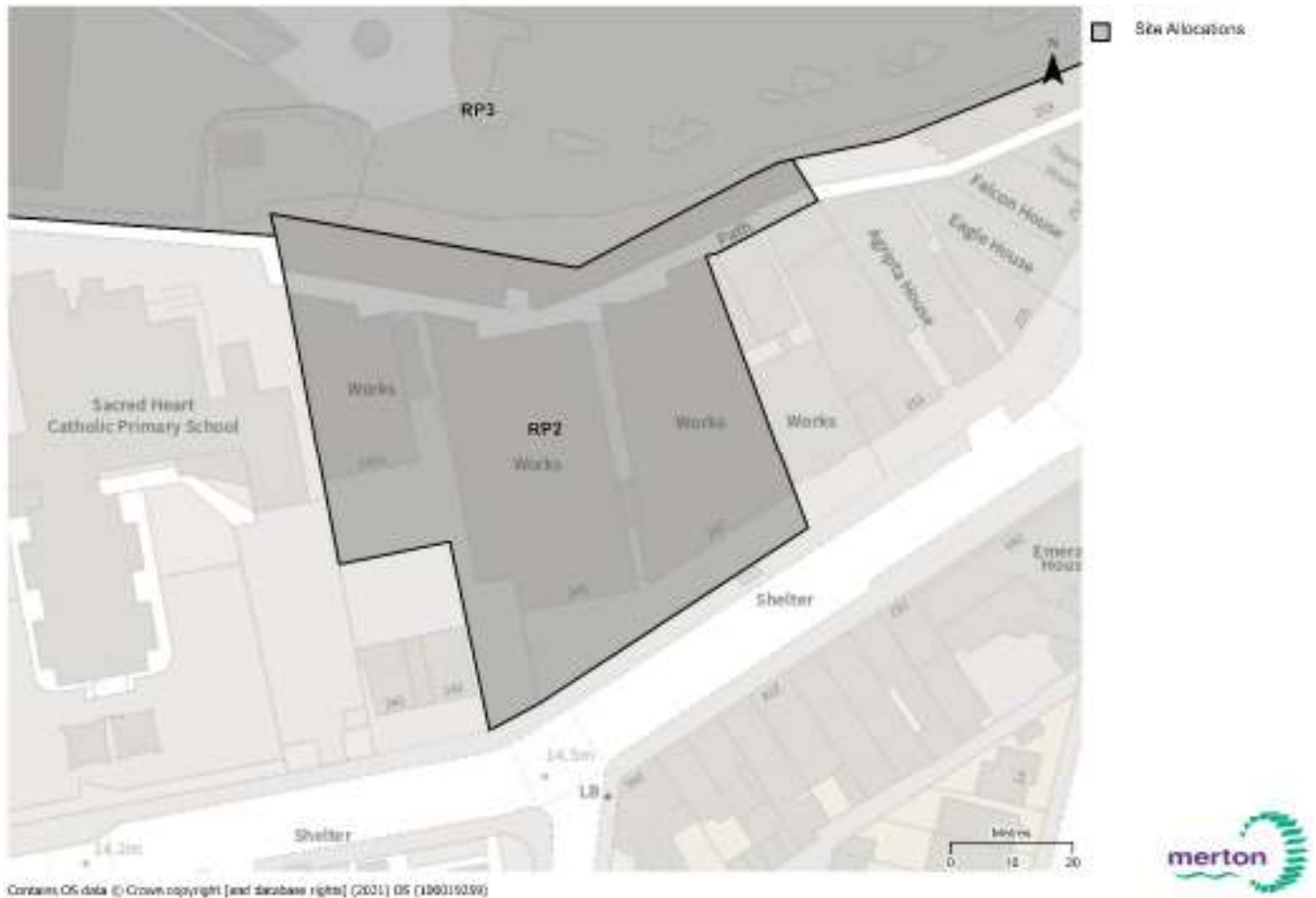
This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is in a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access

SITE RP2: 245 -247 Burlington Road, New Malden, KT3 4NE.



Ward: West Barnes
<p>Site description: The site has several vacant industrial buildings fronting Burlington Road to the south. A range of shops and services are found at the other side of Burlington Road. To the north is the surface car park associated with the substantial Tesco supermarket (part of which is proposed for allocation in this plan as site RP.3).</p> <p>There is a path running east/west along the north boundary of the site providing pedestrian/cycle access from Burlington Road to Beverley Way. To the west of the site lies Sacred Heart Catholic Primary School and a two-storey building for Enterprise car rental.</p> <p>To the east of the site are several commercial buildings ranging from one to two storeys, currently occupied by a car wash and bathroom showroom. Burlington Road is a Locally Significant Industrial location and is next to a primary school.</p>
Site owner: Tesco Stores LTD.
Site area: 1.3 ha.
Existing uses: Former light industrial use; now largely rundown.
Site allocation: Commercial, business, service and community use appropriate to a residential area.
Site deliverability: 5-10 years.

Indicative site capacity: 65- 90 new homes

Design and accessibility guidance:

Development proposals must take the opportunity to improve this part of the Locally Significant Industrial Site and provided a more vibrant, attractive setting for the nearby school, shops and services.

Development proposals must optimise the delivery of new homes in this highly accessible location.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips, through appropriately managed car parking, deliveries and servicing.

Development proposals should protect and improve access for pedestrians and cyclists along the public footpath which runs along the north boundary of the site.

Development proposals must improve the public realm including pedestrian safety and be compatible with the amenity of neighbouring occupiers of buildings.

Development proposals will need to protect the amenity and safety of the users of the primary school on the western boundary of the site.

An investigation on the potential impact of development on Archaeological Priority Area is needed.

The Exception Test is not needed, However, its proximity to areas of Flood Zone 3a and the risk of flooding from the Pyl Brook in the future because of climate change; development proposals must incorporate all recommendations in Merton's Strategic Flood Risk Assessment (SFRA).

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

Development proposal should aim to restore the Pyl Brook, with natural banks and buffer habitat to create a wide corridor, facilitating biodiversity net gain and providing a significant improvement to the green corridor.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

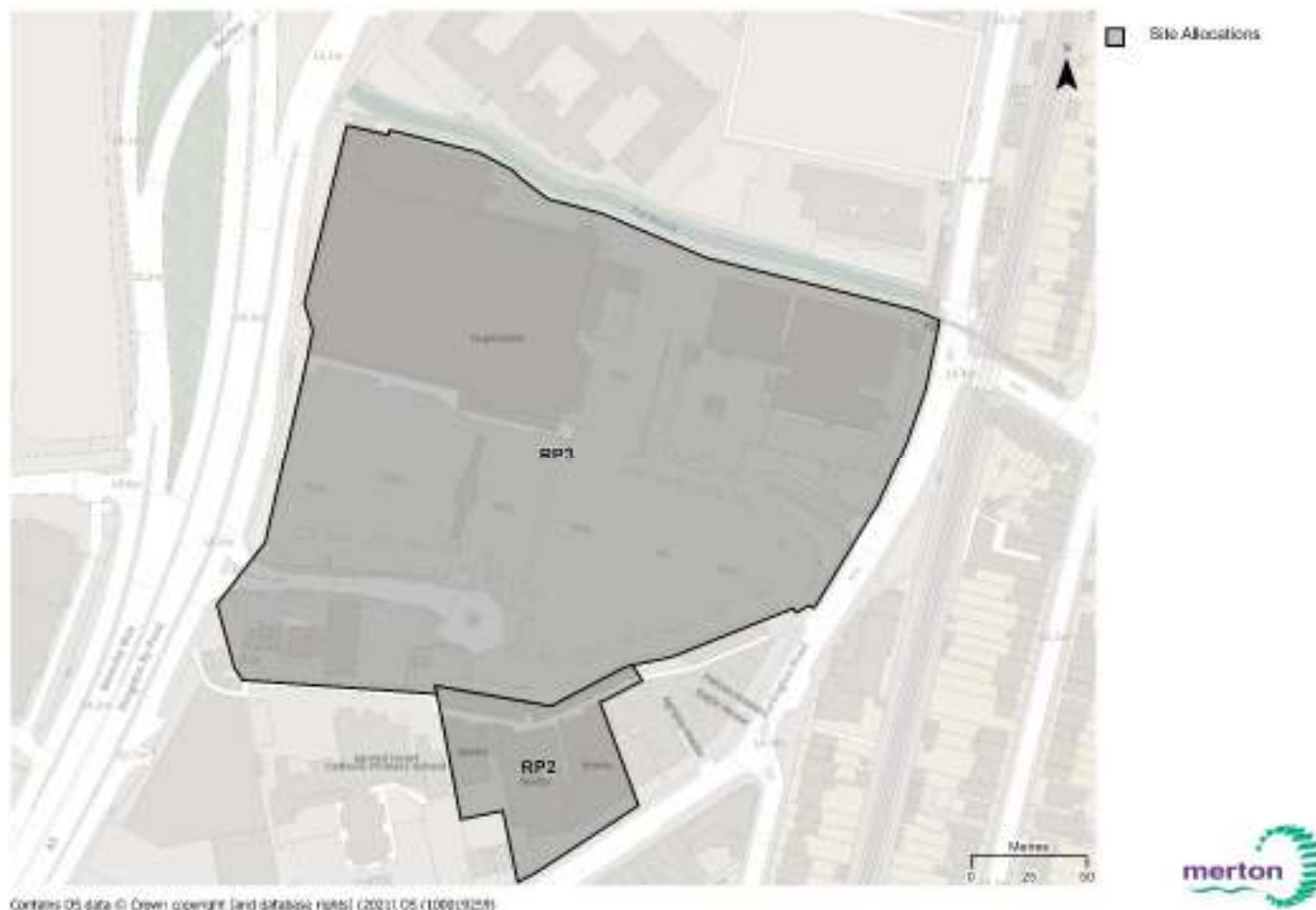
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer liaise with

Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	The northern part of the site is within the Archaeological Priority Area for West Barnes Farm.
Impact on flooding from all sources	Flood Zone 2 – close proximity to 3a.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on an ecology designation.	Southern end of the site is near green corridors.
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE RP3: Tesco, Burlington Road, New Malden, KT3 4N



<p>Ward: West Barnes</p>
<p>Site description: The site includes a Tesco Extra, car parks and an office building. The site is accessed from West Barnes Lane to the east and Beverley Way to the West. The Pyl Brook is the boundary for the north of the site and beyond that lies Raynes Park High School. The railway line from Raynes Park to Motspur Park and a level crossing lies adjacent to West Barnes Lane. The area to the east is characterised by inter-war suburban residential development. There is good access by road from the A3 to the west of the site and a shopping parade and light industrial uses continue along Burlington Road to the south.</p> <p>Part of the site was subject of a Planning Appeal in 2020-21 (19/P2387) On 29th June 2021 the Planning Inspectorate issued a decision to allow the appeal and grant planning permission.</p>
<p>Site owner: Tesco Stores Ltd.</p>
<p>Site area: 5.26ha.</p>
<p>Existing uses: Tesco superstore, vacant office warehouse site.</p>
<p>Site allocation: Comprehensive redevelopment of the site to keep the supermarket with the same floorspace as exists in a new, purpose-built unit and to optimise the rest of the site for delivering new homes, landscaping and access.</p>

Site deliverability: 5-10 years.

Indicative site capacity: 300- 460 new homes

Design and accessibility guidance:

Development of the site provides an opportunity to deliver a considerable number of new homes including affordable homes and a mix of types, sizes and tenures.

Development proposals must substantially improve street environment and enable cycling and walking through the provision of improved access routes through the site including directly to Burlington Road and to enable a connection with the public footpath to the south.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips, including for deliveries and servicing.

Development proposal must not have an impact on the vehicular access / egress (24 hour) to the Tesco store (car park and service yard).

Development of the site presents s an opportunity to improve the currently overgrown and inaccessible Pyl Brook area on the northern boundary of the site (~~Pyl Brøek~~) and provide public access for pedestrians and cyclists.

The residential development at the Site must complement both the existing retail use and this existing residential in the immediate and surrounding area.

Development proposal must incorporate the recommendations of Merton's Strategic Flood Risk Assessment.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The site is close to the A3 which forms part of the Transport for London Road Network (TLRN). TfL recommends no new access or servicing take place from the A3.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure, but do not have concerns relating to the ~~and~~ wastewater

network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

~~The site is close to the A3 which forms part of the Transport for London Road Network (LTRN)—no new access or servicing should take place from the A3 advice from TfL.~~

The site location

Approach to tall buildings	The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings <u>up to 15 storeys subject to consideration of design policies.</u>
Impacts Listed Buildings or undesignated heritage assets.	No.
Impacts a Conservation Area	No.
Impacts an Archaeological Priority Area	The site is within an Archaeological Priority Zone for West Barnes Farm, a Medieval, probably moated, 'Grange' belonging to Merton Priory. <u>No.</u> To the north is a Tier 2 Archaeological Priority <u>Area</u>
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	The site is within fluvial flood zones 2 and 3 and is at risk of surface water flooding.,
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Yes.
Impacts an ecology designation.	Yes, the northern part of the site is adjacent to a Site of Interest for Nature Conservation (SINC) and a green corridor.
Public Transport Accessibility Level (PTAL)	PTAL ranges from 2 – 3, poor to moderate access to public transport.

SITE RP4: 80-86 Bushey Road, Raynes Park. SW20 ~~0WJ~~ 0JQ



Ward: Raynes Park

Site description:

The site consists of large-scale retail sheds ranging between two and five storeys in height **and** open parking areas. ~~and a demolish.~~ Part of the site (the former Thales building) has been demolished. To the west is a new Next at Home store and the A3 'Beverly Way' dual carriageway and to the south is Bushey Road (A298). To the east of the site is West Wimbledon primary school. To the north, on the opposite side of Bodnant Gardens, are two-storey houses.

One of the largest brownfield underutilised site, single ownership sites in Merton with significant redevelopment potential.

Site owner: Friends Life Ltd (c/o Aviva Investors)

Site area: 2.7ha

Existing uses: Part vacant, part retail, office and employment use (light industrial)

Site allocation: Residential-led mixed use development with potential for ground and lower floors commercial, business, services and local community uses appropriate to a residential area.

Site deliverability: 5-10 years

Indicative site capacity: 400 -550 new homes.

Design and accessibility guidance:

The area to the west of the site was delivered in 2017 with a new Next at Home store. Planning permission was previously granted on 4 December 2017 (16/P1317) for the redevelopment of the site for a substantial purpose-built retail floorspace (13,736 square metres), with cafe/restaurants (1,193 square metres), landscaping, associated car parking (334 spaces), cycle parking (100 spaces) and new pedestrian access from Bodnant Gardens.

Development of the site provides a significant opportunity for exemplary design to optimise the potential of this large site.

Development proposal will need to improve walking and cycling and access to public transport between the site and Raynes Park town centre. Cycling and walking routes must be created through the site which would also provide direct access from Raynes Park High School and homes to the south of Bushey Road to shops and services in Raynes Park town centre via Bodnant Gardens. Contributions may be sought towards improvements on the cycle and pedestrian network that connects to the site.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips, through appropriately managed car parking, deliveries and servicing.

Development proposals must protect the amenity of the adjacent homes and school.

Development proposals will need to incorporate suitable mitigation measures.

Due to the site's location relative to the A3 road, the layout, scale and land uses must protect future occupiers from the noise and air pollution arising from the road. This section of the A3 is identified on the Department for Transport noise map.

Access to the site is shared with the existing retailers at Next at Home. Careful, scrutiny of access and junction arrangements needed to minimise impacts on movement, congestion and road safety in particular wider impacts on Transport for London route network.

Transport assessments must consider the potential effects of the whole site to avoid ad hoc proposals, assessment and consideration.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the developer liaise with Thames

Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site. The developer should contact SGN and Thames Water to discuss requirements for any improvements to the water, wastewater and gas infrastructure network from non-residential development.

The site is close to the A3 which forms part of the Transport for London Road Network (TLRN). TfL recommends no new access or servicing take place from the A3.

~~The site is close to the A3 which forms part of the Transport for London Road Network – no new access or servicing should take place from the A3, advice from TfL.~~

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, critical drainage area.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact an ecology designation.	No
Public Transport Accessibility Level (PTAL)	<u>The site ranges from</u> PTAL 1, very poor access to public transport <u>to PTAL 3, moderate access to public transport.</u>

SITE RP5: All England Lawn Tennis Club Community Sports Ground 216 Grand Drive, Raynes Park, SW20.



Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)



Ward: Raynes Park

Site description:

This large site is privately owned and run by the All England Lawn Tennis club (ALTEC). The site hosts tennis facilities including 16 grass courts, nine synthetic surface tennis courts (six of which are covered by two air domes), a clubhouse, changing rooms and parking. The site is part of the AELTC estate and is essential to supporting a successful Wimbledon Championships which is held on the AELTC site on Church Road. As well as supporting the Wimbledon Championships it is used by schoolchildren in Merton and Wandsworth via the Wimbledon Junior Tennis Initiative. It also has provision for residents to play tennis. The site is surrounded, on all sides by semi-detached and short terraces of houses. The site currently has single access from Grand Drive restricting vehicle access to the site.

Site owner: All England Lawn Tennis and Croquet Club (AELTC)

Site area: 7.9ha

Existing uses: Tennis facilities connected with AELTC's operation of The Wimbledon Championships and community and charitable activities.

Site allocation: Tennis facilities connected with AELTC's operation of The Wimbledon Championships, the Wimbledon Junior Tennis Initiative, community tennis programmes with support

for continued and long-term investment in the same. The site ~~can be found in~~ is designated as open space and contains ~~with~~ sport and recreation use that are compatible with its open space designation.

This site provides an opportunity for significant, sustained and long-term investment in sporting facilities in Merton to support The Championships and to provide access to the local community to aid in tackling health inequalities. Development of the site provides opportunities to optimise the use of an underutilised site for uses compatible with its current designation as playing fields.

Site deliverability: 0-5 years.

Design and accessibility guidance:

In 2018 planning permission was granted for a second tennis air dome containing three acrylic courts, 16 external grass courts associated landscaping and drainage and an outline planning application for a replacement clubhouse. In total the site hosts tennis facilities including 16 grass courts, nine synthetic surface tennis courts (six of which are covered by two air domes), a clubhouse, changing rooms and parking.

Opportunity to upgrade and improve AELTC's facilities to continue the prominence of The Championships and the opportunity to host more of the pre-Championship activities within Merton.

Development proposals should explore alternative access arrangements which could improve the site's resilience.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips.

Development proposals will need to continue to incorporate suitable mitigation measures to address the issues with the site and incorporate the recommendations in Merton Strategic Flood Risk Assessment.

Development proposal must protect the residential amenity of adjacent properties.

Opportunities for investment in sporting facilities that can be accessed by local people and support and create new jobs.

Opportunities to recognise The Wimbledon Championships significant economic and social benefits to Merton.

Opportunity in combination with the AELTC Church Road main site, to support the capacity of the Wimbledon Junior Tennis Initiative by providing better facilities for the free tennis coaching programme for primary school children in Merton and the neighbouring borough of Wandsworth.

Infrastructure Requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

The developer should contact SGN and Thames Water to discuss requirements for any improvements to the water, wastewater and gas infrastructure network from non-residential development.

This site is in an area identified as being deficient in access to public open space. The council will require major development proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space

on site where this is suitable and viable, in accordance with the Green Infrastructure policies.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impact flooding from all sources.	Yes. The site has historically suffered from surface water drainage issues.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, the site is designated as Open Space and is near to Metropolitan Open Land (MOL).
Impacts on ecology designation.	Yes. The site is near to a Local Nature Reserve, Green Corridor and Site of Interest for Nature Conservation (SINC).
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

Site RP6: Land at the former LESSA Sports Ground Grand Drive, Raynes Park, SW20 9EB.



Ward: West Barnes

Site description:
 The site includes a fenced off field, accessible from Meadowview Close. Within the northeast corner of the site lies a small playground that is closed off to general the public use and described as only being available for the use of the residents living on Meadowview Road

To the north of the site are 44 homes along Meadowview Road and Raynes Park Tennis Club, built by 2013 as part of a single scheme which allowed the redevelopment of homes on open space if the development funded sports facilities. The site is surrounded by short terraces line of a formal street layout with some grass verges and street trees.

The rear windows and gardens of terraced houses or flats overlook the site on the eastern, southern and western boundaries.

Site owner: Bellway Homes.

Site area: 2.8ha

Existing uses: The site is currently fenced off and a vacant field. The consultee’s submission states that the field has been secured to prevent it falling to disrepair, that there is no interest in the site being

used solely as sports fields and that the legal obligations relating to the previous planning permission (2009) which required the field to be offered as a sporting facility, maintained or provided as open space have all expired.

Site allocation: Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered

Site deliverability: 0-5 years

Design and accessibility guidance:

The landowner submitted a planning application for a mixture of new homes and tennis facilities to Merton Council in October 2020 (reference 20/P3237).

The site has an extensive planning history. It was part of a larger site that was granted planning permission on appeal in 2009 for the redevelopment of the site to provide:

- 44 homes (along what is now Meadowview Road).
- new tennis courts and clubhouse for the relocated Raynes Park Tennis Club – sports provision (on this site proposal) offered to Merton Council or Kings College School

Development of the site may provide opportunities for entire site sports use.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips.

Development proposals should maximise opportunities to provide publicly accessible cycle and pedestrian routes across the site including protecting and enhance the existing route that runs along the northern boundary of the site.

Development proposals for sports use or other uses compatible with the designated open space should be actively demonstrated prior to any alternatives being taken forward.

Development proposals must incorporate the recommendations of Merton's Strategic Flood Risk Assessment. Development proposals must ensure that the drainage on the site will have to be improved and addressing the likelihood of fluvial flooding and the critical drainage area.

Development proposals should protect the amenity of surrounding residents.

Infrastructure Requirements:

[Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#)

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure; however, the scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted

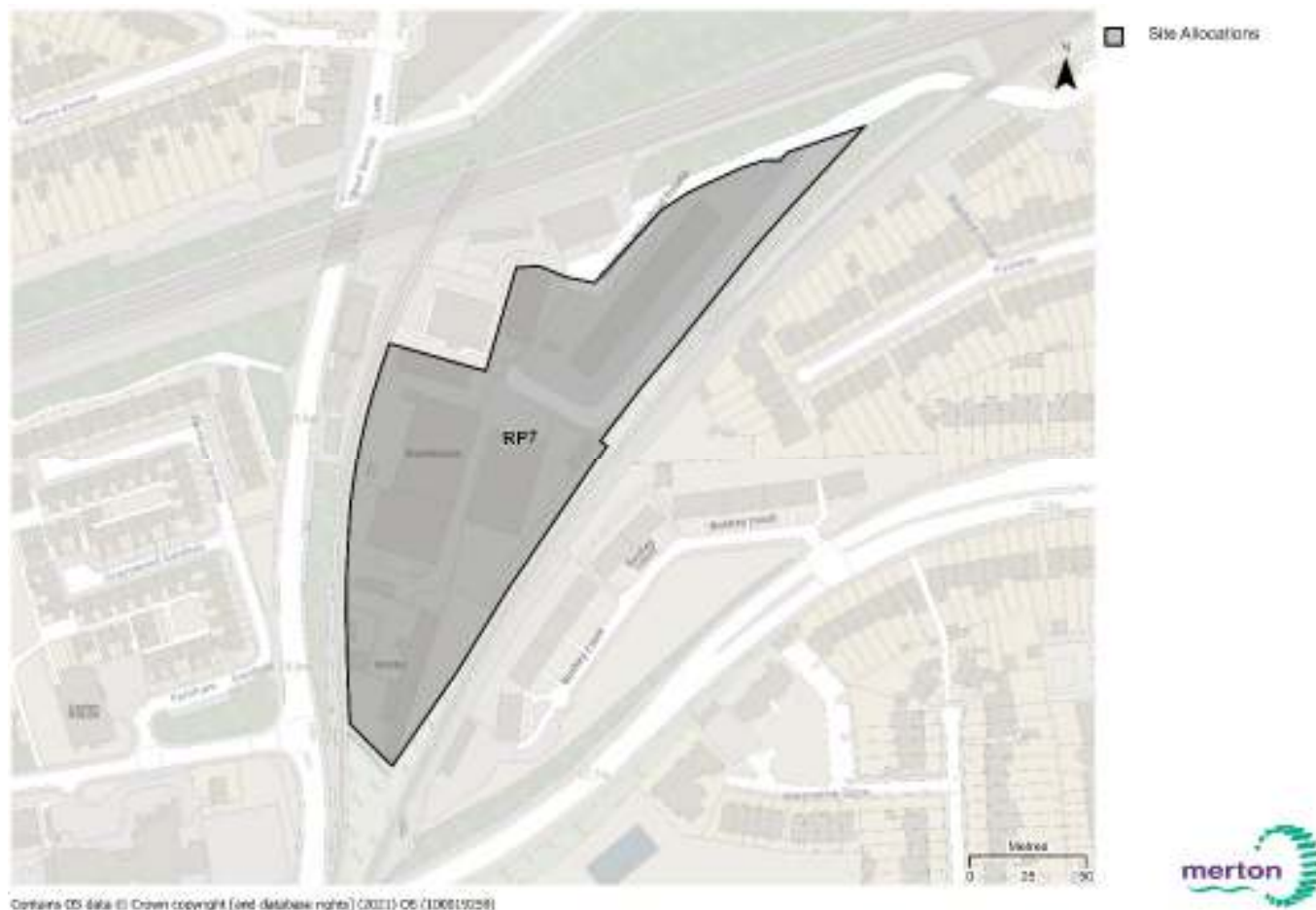
planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, part of the site is within flood zone 3 and within a critical drainage area.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, the site is designated as open space.
Impacts an ecology designation.	No.
Public Transport Accessibility Level (PTAL)	PTAL 1, very poor access to public transport.

SITE RP7: Rainbow Industrial Estate Grand Drive, Raynes Park, SW20 0JY



Ward: Raynes Park

Site description: The site is an industrial estate to the south of Raynes Park town centre. It is bounded on all sides by railway lines originating from Raynes Park station. There is some residential development at the other side of the railway lines to the west of the site of an office building (now a church) and a residential development of 4 storeys. To the east are inter-war terraces and towards the south is Bushey Court, a residential block of 4 storeys.

Site owner: Workspace 12 Ltd.

Site area: 1.88ha

Existing uses: Industrial sheds, storage, car/van hire, coach parking, car repairs, skip hire etc.

Site allocation: Employment led regeneration in line [Rainbow Industrial Estate planning brief](#), including public realm improvements close to Raynes Park station. Proposed allocation to clarify the existing planning approach.

Deliverability: 10-15 years

Indicative site capacity: 200- 225 new homes.

Design and accessibility guidance:
The Rainbow Industrial Estate planning brief is a design and planning framework to guide the redevelopment of the Rainbow Industrial Estate. The brief's general requirements for the

redevelopment of the site is to provide approximately 3400m² of business floorspace for Small and Medium sized enterprises (SME's), a publicly accessible drop off point ('Kiss and Ride') for Raynes Park railway station, and the provision of up to 250 new homes.

Planning permission was granted in 2015 (refs: 14/P4287 and 14/P4188) for 224 residential units and 3,449sqm of commercial floorspace and for the provision of a 'kiss and ride'. The scheme is now being phased and the business floorspace and kiss and ride have **commenced been implemented**.

Opportunity to create a sense of place and identity out of this almost invisible site and opportunities set out in the planning brief and addressed in planning permission (14/P4287).

Infrastructure requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The site is next to a proposed Crossrail2 station and rail tracks proposed for upgrade by Crossrail2, (should Crossrail2 be fully funded). The council and TfL require engagement and cooperation with the Crossrail 2 safeguarding team on the delivery development proposals for this site.

Thames Water has identified the scale of development/s is likely to require upgrades to the water supply and wastewater network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location

Impacts Listed Buildings or undesignated heritage assets.

No

Impacts a Conservation Area

Yes

Impacts an Archaeological Priority Area

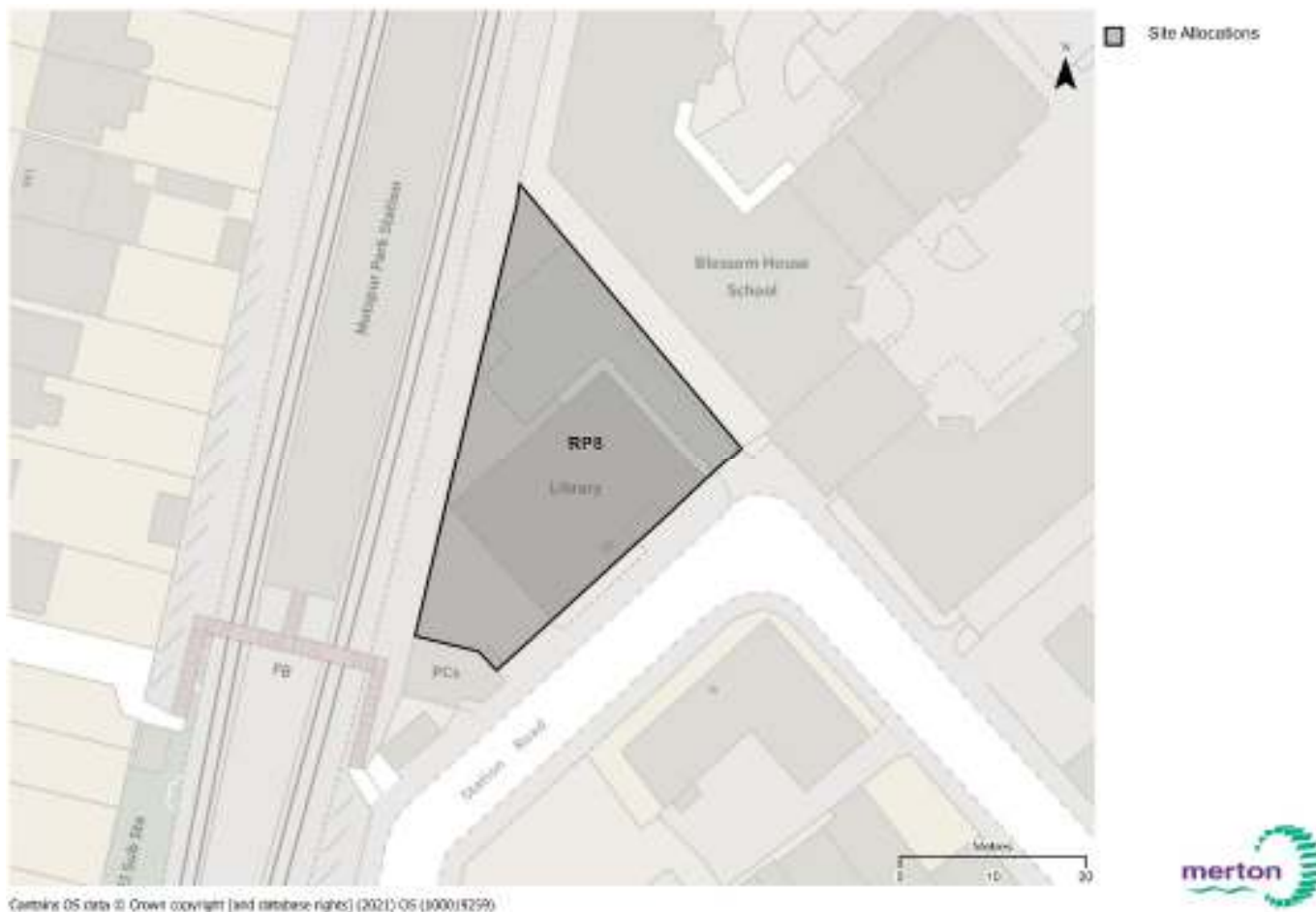
No

Impacts a Scheduled Ancient Monument

No

Impacts on flooding from all sources.	Yes, site is in a critical drainage area.
Is in a town centre.	Very close to Raynes Park town centre.
Is in an Opportunity Area	No
Impacts a designated open space.	No.
Impacts an ecology designation.	Yes, Site of Interest for Nature Conservation (SINC) and Green Corridors.
Public Transport Accessibility Level (PTAL)	PTAL 4 -5, good to very good access to public transport.

SITE RP8: West Barnes Library 10 Station Road, Motspur Park, KT3 6JF.



Contains OS data © Crown copyright (and database rights) (2021) OS (100019259)

Ward: West Barnes
Site description: The site has a single storey building tucked away behind Motspur Park Station. To the west the site is bounded by railway line. To the east there is two to three storey office building.
Site owner: Merton Council
Site area: 0.1ha
Existing uses: Library
Site allocation: Library with residential on upper floors
Site deliverability: 5-10 years.
Indicative site capacity: 10-15 new homes.
Design and accessibility guidance: A library service/function is to be kept.
Cabinet agreed to progress with development of the site with a new and improved library presence in 2014. Plans were paused whilst consultation took place about the impact of the Crossrail2 development on the local area. Further feasibility work is currently being progressed.

A mixed-use development of the site provides an opportunity to facilitate the provision of an upgraded community uses on lower floors and create a more secure, safe and active environment.

Development proposals will need to increase customer floor area, provide an adaptable suitable modern space with added space for community use and provide housing on the upper floors.

Development proposals will need to be sensitive to the railway lines and mitigate parking, traffic and road safety impacts on neighbouring residents.

Development proposals should contribute towards improving the public realm around the station for cyclists and pedestrians including the provision of improved publicly accessible cycle parking facilities for users of the library and station.

Development proposal must incorporate the recommendation of Merton's Strategic Flood Risk Assessment. The railway embankment acts as a barrier to surface water flow through the centre of the critical drainage area. Historic surface water flooding records identify drainage network capacity issues which cause water flooding in this area during heavy rainfall.

Infrastructure requirements:

[Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#)

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The site is next to a proposed Crossrail2 station and rail tracks proposed for upgrade by Crossrail2, (should Crossrail be fully funded). The Council and TfL require engagement and cooperation with the Crossrail 2 safeguarding team on any development proposals for this site.

A project to implement step free access at Motspur Park station would likely impact land directly to the rear of the site and there is a requirement for consultation and cooperation with Network Rail in relation to this.

Thames Water does not envisage infrastructure concerns for the water supply network. However, Thames Water has identified the scale of development/s is likely to require upgrades to the wastewater network and sewage treatment infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.

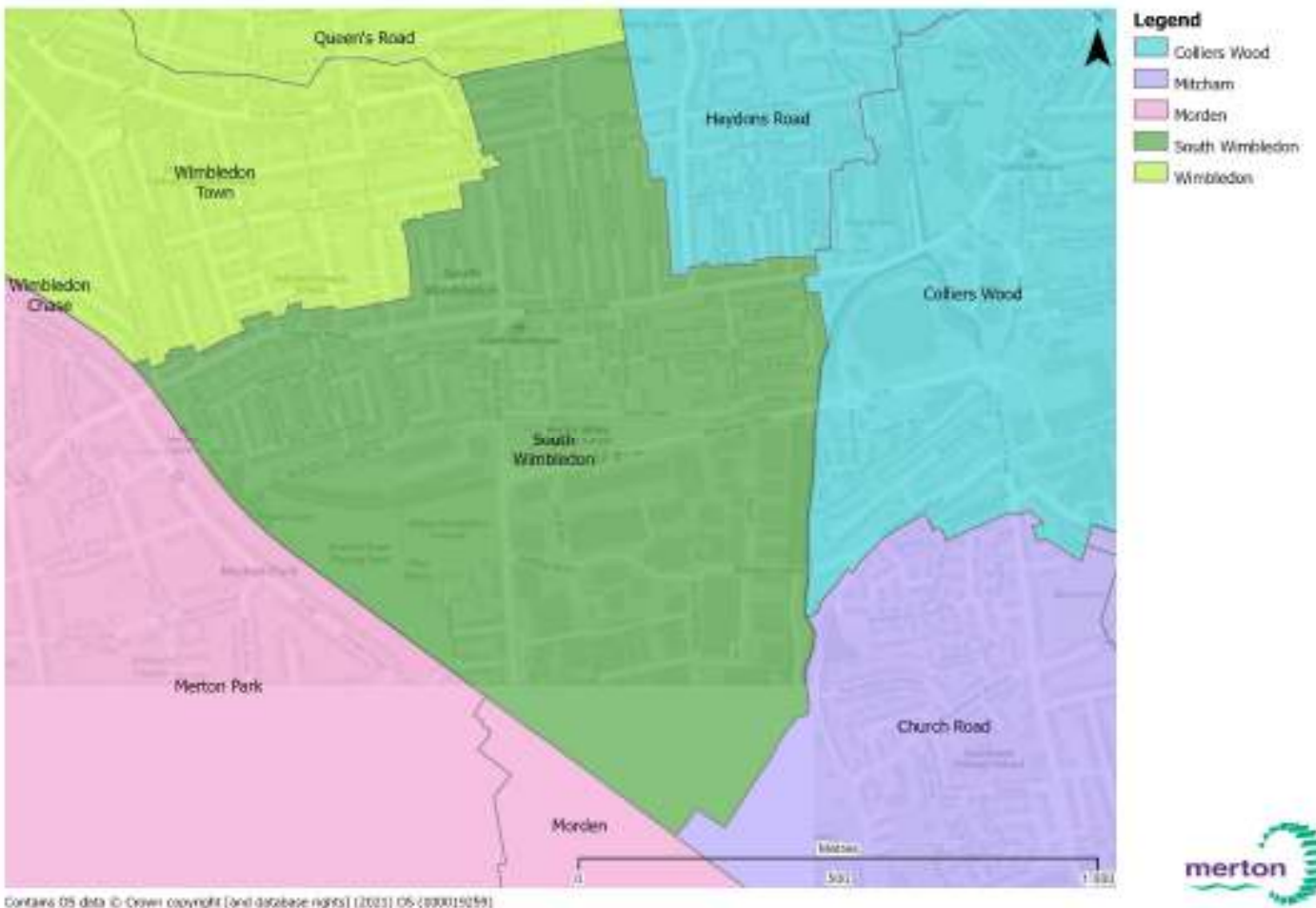
Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, site is in flood zone 2 and within a critical drainage area.
Is in a town centre.	Yes.
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on ecology designation.	Yes, green corridor.
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

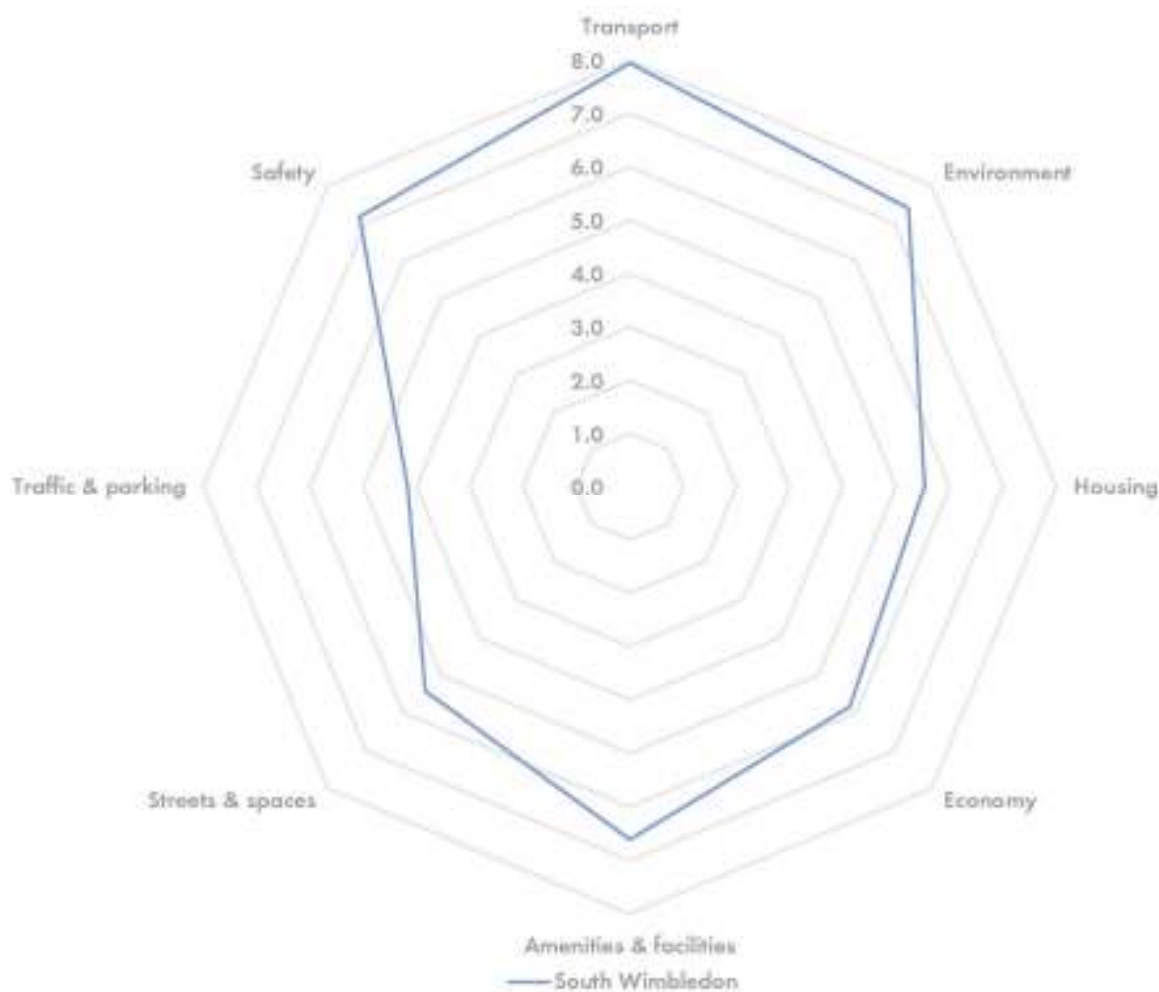


07. SOUTH WIMBLEDON



PLACE PROFILE: SOUTH WIMBLEDON

In 2020, as part of the Borough’s ongoing Character Study, 415 Merton residents took part in this survey, of which 19 people told us they lived in South Wimbledon. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform [Merton’s Borough Character Study 2021](#).



Results from residents of South Wimbledon rating their neighbourhood

KEY OBJECTIVES: SOUTH WIMBLEDON

The following objectives provide an overarching vision for South Wimbledon.



Improving public realm and public space

Support improvements to streetscene and shopfronts, improving the public realm, particularly for pedestrians and cyclists.



Improving the environment

Encouraging measures that help to minimise and mitigate pollutants associated with the busy road network, including planting and green cover.



Promoting the town Centre

Proposing a new Local Centre at the heart of the South Wimbledon, focussed around the Underground station and junction.

CHARACTER: SOUTH WIMBLEDON

These photos illustrate the diverse character found across South Wimbledon.





SOUTH WIMBLEDON: POLICY N7.1

Recognising South Wimbledon as a distinctive neighbourhood in its own right

We will do this by:

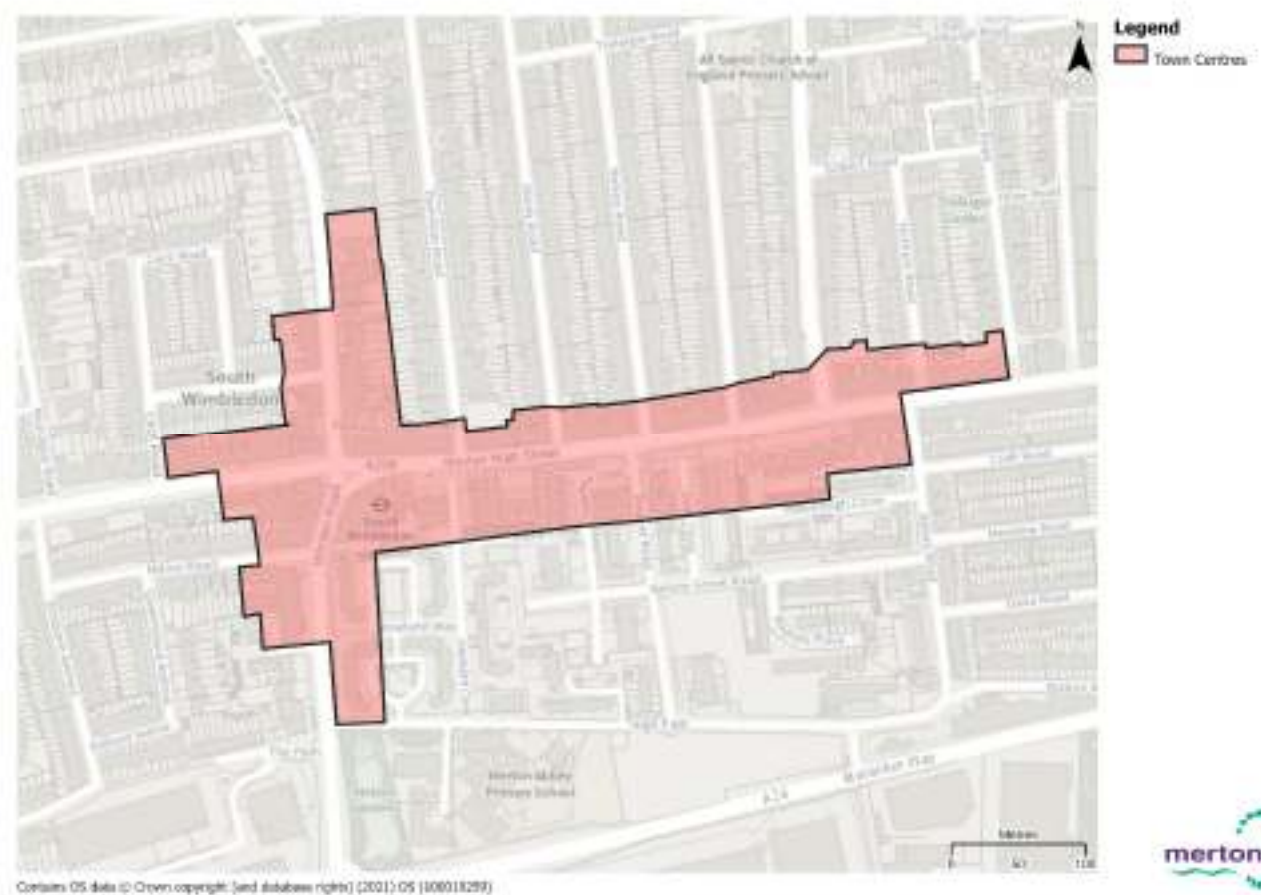
- a. Proposing a new Local Centre at the heart of the South Wimbledon, focussed around the underground station and the junction where Morden Road, Merton Road, Kingston Road and Merton High Street meet;
- b. Supporting shops, services and businesses commensurate with a local centre, particularly those that serve the day-to-day needs of local residents;
- c. Supporting developments and occupiers that help improve or strengthen local character, reflecting the area's rich architectural history or providing a modern interpretation;
- d. Support developments that create a well-designed shopfront ~~in accordance with Merton's shopfront guidance~~ and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;
- e. Supporting measures to enhance the streetscene and public realm in South Wimbledon, particularly along the main roads where most travel takes place;
- f. Encouraging measures that help to minimise and mitigate pollutants associated with the busy road network, including planting and green cover, measures to encourage walking and cycling and, electric vehicle charging points;
- g. Protecting and enhancing the public open space at Nelson Gardens and improving links to Abbey Rec, Wandle Park and other nearby open spaces
- h. Support development commensurate with the excellent public transport access of the area
- i. Support improvements to the transport infrastructure that will help to reduce road congestion and improve the public realm, particularly for pedestrians and cyclists;
- j. Work with the regeneration phases being delivered on the High Path estate over the next 10-15 years, guided by the Estates Local Plan; this includes the proposed public park at High Path;
- k. Supporting the redevelopment at South Wimbledon station which respects and enhances the listed building and encouraging a public space and secondary pedestrian entrance to the underground station off the busy main roads.

JUSTIFICATION

- 7.1.1.** South Wimbledon lies at the centre of Merton; in previous Local Plans the area has been subsumed into Colliers Wood or Wimbledon. However, there are now a number of factors that support South Wimbledon being considered a defined Local Centre in its own right and the council proposes to take this forward through this new Local Plan. These factors are set out below.
- 7.1.2.** It is clear from the responses to the consultation and the work started by the community-led South Wimbledon Enhancement plan that residents consider South Wimbledon as a neighbourhood with its own distinctive character.
- 7.1.3.** The area has a very strong historical context. Although there are limited remnants that are easily visible above ground, there are many distinctive historical references to be found in structures, buildings and local gardens in the area. Admiral Lord Nelson's "Paradise Merton" estate was located where High Path now stands and St John the Devine Church and Nelson Gardens were both created to commemorate the anniversary of Nelson's death. South Wimbledon station building and Rodney Place cottages are both heritage assets directly connected to the advent of London Underground. The surrounding residential areas have distinctive characters and built form in themselves (e.g. the "Battles" roads of Victorian / Edwardian terraces, the "Australias" to the west, the High Path estate itself) and these design standards are occasionally reflected on Merton High Street and Kingston Road. These residential neighbourhoods are, in appearance, distinct islands of development except where they meet the main road frontage. We therefore support residents in trying to create a more cohesive, integrated South Wimbledon local centre, based around the South Wimbledon junction.
- 7.1.4.** Like other Local Centres, the function of South Wimbledon is to provide local shops and services for people that live nearby so that households can access these by walking or cycling, reducing the need to travel far or to travel by vehicle. We recognise that the way we shop is changing, and rapidly. The increase in online shopping, the recent rise of food delivery apps and changes to national rules to allow small shops throughout England to convert to flats without planning permission is changing the economic viability and occupation of shopfronts.

- 7.1.5. Across London there has been a contraction the numbers of shops along main road arteries, slightly offset by a rise in cafes and restaurants around transport hubs which can serve both passing customers and the wider area via online food delivery apps. Kingston Road in particular has seen several small shops convert to flats outside the planning system; there are some good examples and some extremely poor examples of the resultant shopfronts.
- 7.1.6. The Local Centre boundary focusses on South Wimbledon junction encompassing shopping parades in all directions where shops and services are most likely to be viable due to the higher footfall and is informed by feedback from people who live and work there.

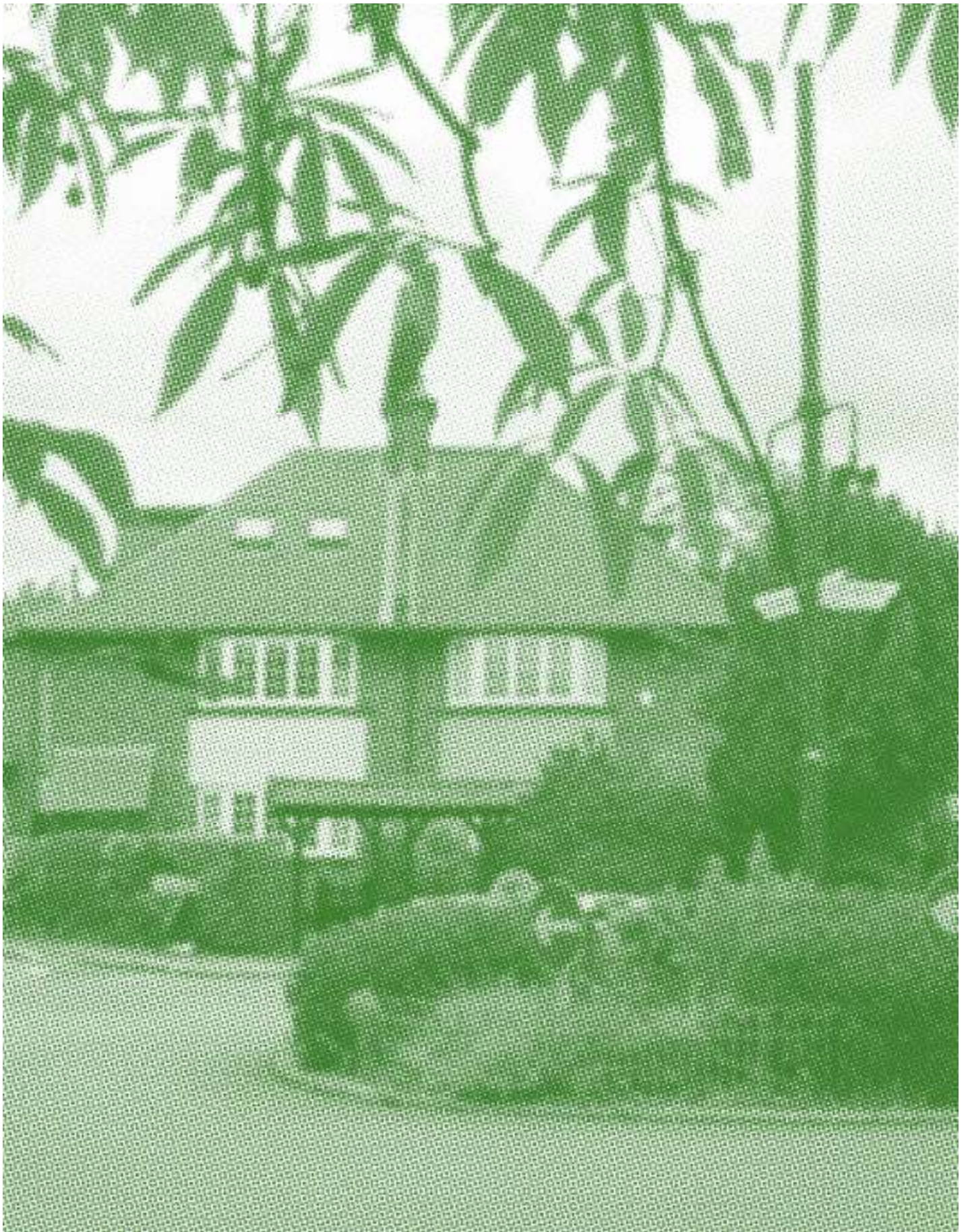
Local Centre boundary for South Wimbledon:



- 7.1.7.** There are a wide variety of different businesses fronting the main roads around South Wimbledon. Many are small supermarkets or food shops, cafes, restaurants and hot food takeaways. We will continue to support businesses commensurate with the Local Centre. We recognise the larger number of hot food takeaways in South Wimbledon and the links to childhood obesity, in accordance with other policies in the plan, will not support further takeaways where there is already an over-concentration.
- 7.1.8.** People are more likely to use local shops and services if they are in an attractive setting, if the walking or cycling route to reach them looks good and feels safe. While many of the surrounding local streets are attractive with properties that are generally well cared for and maintained by their occupants, the busy arterial roads are noisy, heavily trafficked and don't have the same sense of place as exists in the surrounding neighbourhoods.
- 7.1.9.** To help create a better sense of place at the junction around South Wimbledon underground station junction, we will support development and public realm improvements that soften the look and feel of the Local Centre, reference the historic and local character of the surrounding areas, provide development standards (e.g. building orientation, insulation, winter gardens etc. that helps mitigate the road issues). We recognise that in the long term the South Wimbledon junction needs active travel improvements and a reduction of traffic dominance on Merton High Street. However, South Wimbledon does benefit from several long standing successful low traffic neighbourhood schemes, that create a pleasant walking and cycling environment away from Merton High Street. There are alternative links on quiet streets with permeable connections through to cycle route CS7 and the Wandle Trail.
- 7.1.10.** The council will also encourage businesses and residents to restore or redevelop building facades to a high standard. South Wimbledon is rich in architectural history, such as the Victorian detailing found on many buildings which give the area a distinct character; development proposals should reflect existing elements or interpret them in a modern way. Merton's shopfront design guide provides practical information about how to assess, design, and maintain a successful shopfront and can be used regardless of the occupier of the building.

- 7.1.11.** Consultation responses to the Local Plan and prior to the Local Plan have called for more public space to be created around South Wimbledon. Nelson Gardens along Morden Road is perhaps too far away from the station and the areas of highest footfall to be well used. Proposals for the High Path estate, as guided by [Merton's Estates Local Plan](#) and set out in the approved Outline Planning Application (ref 17/P1721) will provide a new public park as well as smaller pockets of landscaped space within the estate. However aside from the regeneration of High Path there are no large sites in the immediate South Wimbledon area adjoining the main roads and so there is more limited opportunity for the creation of new public space with close proximity to where most people use the Underground Station, shops and services and would benefit the most.
- 7.1.12.** The council therefore supports the creation of small pockets of well-designed public space close to South Wimbledon underground station where they are most likely to provide opportunities for pause away from the busy main roads.
- 7.1.13.** Although a third of Merton is made up of parks, commons and other open spaces, South Wimbledon has more limited open space provision than most of the rest of Merton. Some of the nearest public open spaces for South Wimbledon residents are at Nelson Gardens, Abbey Recreation Ground and Haydon's Road Recreation Ground and parts of South Wimbledon are in easy walking distance of the Wandle Trail. Where development proposals cannot provide sufficient open space on site, they may be expected to contribute to improvements at nearby open spaces.
- 7.1.14.** The regeneration of the High Path estate will take place in phases over the next 15 years. This investment will result in the most substantial change to the layout, function and character of High Path. While [Merton's Estates Local Plan 2018](#) provides the planning framework to guide this regeneration, it will also deliver key proposals that South Wimbledon respondents have called for, including a public park fronting Merton High Street, a new layout fronting Merton High Street with new shopfronts and business space; investment in landscaping and the public realm.

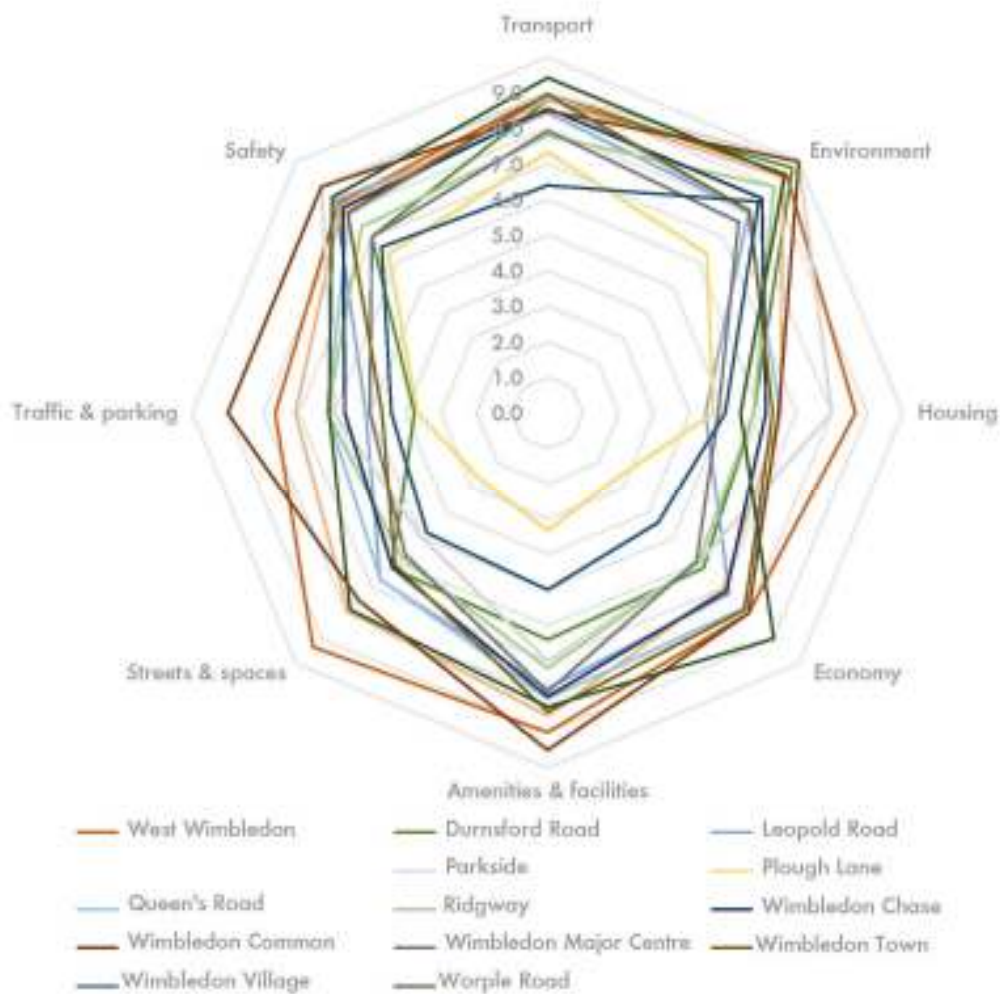
- 7.1.15.** As set out in Merton's Estates Local Plan 2018, the detailed design of the regeneration at High Path must create a strong character, particularly fronting Merton High Street and provide high quality landscaping and urban greening. New development proposals must also have regard to the proposed regeneration at High Path as well as this plan, to ensure that South Wimbledon is developed as a cohesive, attractive and legible neighbourhood. Before designing new schemes, potential applicants for schemes within the vicinity of the High Path estate are advised to refer to the High Path section of Merton's adopted Estates Local Plan 2018 and to contact the applicants of the outline planning application 17/P1721 (Clarion Housing Group) to ensure co-ordination of site designs, uses, materials and movement.
- 7.1.16.** South Wimbledon Business Area (also known as Morden Industrial Area) to the south forms part of Merton's Strategic Industrial Locations and is one of Merton's most popular and best occupied estates for businesses throughout south London. Developments will be supported that retain or improve the area for employment purposes, especially those catering for modern business accommodation. Development that could locate in town centres such as retail or offices that are not ancillary to other development will be resisted, in order to minimise potential conflict with the HGVs and extended business operational hours required in a modern economy.



CHAPTER 09. WIMBLEDON

PLACE PROFILE: WIMBLEDON

As part of the Borough’s ongoing Character Study, 415 Merton residents took part in this survey, of which 136 people lived in Wimbledon. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform [Merton’s Borough Character Study 2021](#).



Results from residents of Wimbledon rating their neighbourhood

KEY OBJECTIVES: WIMBLEDON

The following objectives provide an overarching vision for Wimbledon.



A vibrant town centres.

Encourage appropriate development to support businesses and attracts visitors and tourism to the area all year round.



Greening Wimbledon

Enhance the experience of Wimbledon by requiring exemplary design and landscaping, street scene and public realm investment.



Conserving character

Maintain the unique character and built form of the areas surrounding the Town Centre by supporting development of high quality that is commensurate with the scale.

CHARACTER: WIMBLEDON

These photos illustrate the diverse character found across Wimbledon.





WIMBLEDON: POLICY N9.1

Wimbledon Town Centre

To ensure that Wimbledon continues to be a thriving destination for businesses, residents and visitors.

We will do this by:

- a. Promoting Wimbledon as south west London's premier location for business, leisure, living and culture: an exemplar for good quality and sustainable placemaking.
- b. Driving investment and innovation in workspaces to support the local economy and jobs in the town centre commensurate with Wimbledon's role as a major centre. Encourage development that attracts residents businesses, visitors and tourism to the area all year round, including high quality hotels, conference facilities and cultural activities.
- c. Enhancing the experience for people coming to Wimbledon commensurate to its international reputation by requiring exemplary design and landscaping, street scene and public realm investment, taking the Healthy Streets Approach including opportunities to green Wimbledon.
- d. Supporting high quality architecture and design with traditional urban blocks with active frontages.

[Supporting tall buildings within Wimbledon town centre in accordance with the details in the Strategic Heights Diagram for Wimbledon town centre and the requirements in Policy D12.6 Tall Buildings.](#)

- e. Respecting views from Wimbledon Hill through the town centre and beyond, with taller developments [set at St George's Road, Hartfield Road and Broadway East](#), away from the historic core located around the station., ~~St George's Road, Hartfield Road and Broadway East.~~
- f. Strengthening the position of Wimbledon as a Major Centre in south London through the redevelopment of key sites within the centre.

-
- g. Promoting a vibrant daytime, evening and night time economy through a mix of commercial and community uses.
 - h. Promoting good placemaking by providing places for people to meet, relax, enjoy events and participate in the town centre., ~~as set out in the public space framework in the Future Wimbledon SPD.~~
 - i. Improving health and wellbeing by promoting walking and cycling: making the town centre more attractive, greener, safer, easier to get around for pedestrians and cyclists.
 - j. Securing improvements to public transport and investment in Wimbledon station to improve the passenger experience ~~and reduce severance with new bridges over the railway~~. Any proposals for Wimbledon Station should provide links to neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.

Creating an improved environment for shopping and leisure activities by reducing traffic dominance and managing delivery and servicing needs in a safe, efficient and sustainable way, including through exploring the use of freight consolidation and last mile delivery solutions

Surrounding neighbourhoods of Wimbledon

- k. Maintaining the unique character and built form character of Wimbledon Village, supporting development that is commensurate with the scale and the significant quality of this Local Centre.
- l. Supporting development that attracts greater footfall and boosts the visitor experience to Wimbledon Village and Arthur Road Local Centres;
- m. Supporting environmental improvements and maintaining the day-to-day shopping and other services at Wimbledon Chase and Arthur Road Local Centre;
- n. Supporting improvements to business premises and the public realm in Haydon's Road to bolster local high street offer.
- o. Conserving and enhancing the quality of neighbourhoods within the neighbourhoods through Conservation Area character protection, and by supporting ~~incremental~~ development that

respects the character and heritage assets within the area;

- p. Supporting proposals to improve walking and cycling between the neighbourhoods of South Wimbledon, Colliers Wood, Wimbledon, Wimbledon Village, Raynes Park, Wimbledon Chase and outside the borough to Tooting, Southfields and Kingston.
- q. Recognise the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road and at Raynes Park to maintain its global position as the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally.

[Supporting accessible local services including step-free access at Haydons Road and Wimbledon Chase stations.](#)

JUSTIFICATION

- 9.1.1.** Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only major town centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure.
- 9.1.2.** The [Future Wimbledon Supplementary Planning Document \(SPD\) 2020](#) outlines the priorities for Wimbledon town centre:
- **Design quality** - Design quality underpins good growth. The future of Wimbledon should draw inspiration from its past. With many existing high quality listed buildings, future development should enhance their character and setting. Buildings should respond to the principles and materials from their context. Careful consideration to building heights and scale must be given, in particular when relating with heritage assets and views from neighbouring conservation areas.
 - **Public realm** - Spaces to dwell, socialise and relax are vital for the life of a town centre and the wellbeing of people. Wimbledon does not currently have many public spaces. The piazza is the main focus for outdoor events and markets. Feedback from the public suggested spaces such as a new town square and multiple smaller spaces are desirable.
 - **Urban greening and sustainability** - Creating a sustainable and environmentally focused town centre was highlighted as a key priority during consultation. The redevelopment of the town centre gives Wimbledon the opportunity to be a leader in sustainable design. Sustainable drainage systems should be used where possible and planting species that improve air quality and biodiversity should be integrated into the design of the public realm.
 - **Future of the high street** - Wimbledon already has a variety of uses spread across the town centre. However, feedback from the consultation suggested that the public would welcome more uses that compliment what is already existing. Suggestions such as spaces that provide opportunities for independent shops and affordable workspaces were mentioned as uses that would add to the vibrancy and vitality of the town centre and in the shorter-term assist with post-covid recovery.

- **The station and railway** - There are long term ambitions to overcome the severance caused by the railway tracks, therefore creating a more accessible and connected town centre. Consultees highlighted the need to reduce traffic dominance throughout the town centre and to humanise the public realm. A world class station that has a sense of arrival with access to rail, underground, tram and buses was desired.
- 9.1.3.** A fundamental theme throughout the engagement on the Future Wimbledon SPD, workshops, landowners' forums and responses to planning applications, community feedback and general participation in civic life has been the desire to improve the look and feel of Wimbledon town centre and the quality of the experience people have there, commensurate with the Wimbledon / SW19's international reputation. The Wimbledon area has a rich historical significance with high quality neighbourhoods and open spaces including Wimbledon Common. The town centre itself has pockets of well-loved and well-designed buildings but also parts that do not reflect the quality of the surrounding area.
- 9.1.4.** Improvements to the public realm, street scene with more business and professional services and quality shops, balanced with community, leisure, arts, culture and associated facilities including tourism will achieve a noticeable uplift in the quality of the centre.
- 9.1.5.** Greening Wimbledon, whether by creating new landscaped pocket parks within a new development or by adding planters, street trees or climbers to existing spaces, is a key priority. Greening has multiple benefits: it can improve the attractiveness and sense of calm and safety of a place, particularly for pedestrians, it adds to visual interest and it can benefit air quality. The Council will encourage all developments in Wimbledon to optimise the greening of their site and the creation of parklets and other human-scale spaces for people to enjoy. We will support measures outside the planning system that help make Wimbledon more attractive and foster a sense of community ownership, such as the re-use of planters and community planting of street trees.
- 9.1.6.** We need growth in Wimbledon, and we need to plan it to secure the best quality we can for our town centre. Wimbledon is a long, linear town centre set at the bottom of Wimbledon Hill and tightly bound by attractive established residential terraces, some of which are within Conservation Areas. With the exception of development sites at Dundonald Yards and Gap Road that will only be unlocked by Crossrail2, Wimbledon has no scope to accommodate

growth by expanding outwards. The local topography and quality townscape mean that Wimbledon is not suitable for high rise towers therefore to accommodate growth in keeping with the area, sites within Wimbledon town centre need to become denser and accept a moderate increase in heights.

- 9.1.7.** We encourage dense mid-rise urban blocks similar to those of Bloomsbury where heritage assets are complemented by new buildings of quality design.
- 9.1.8.** Views through the town centre and beyond from Wimbledon Hill will be respected, with taller developments set away from the historic core, located at the station, St George's Road and Broadway East.
- 9.1.9.** New developments should contribute to creating great streets and spaces. We experience cities at ground level and street activation is key to a successful place. Interpreting Victorian detailing is important for shop fronts, whatever the end occupier. More advice on designing a quality shopfront can be found in Merton's shop front design guide 2017.
- 9.1.10.** Developers who look to build in Wimbledon must demonstrate a commitment to quality and design. Great contemporary design and materials that reflect, respect and enhance the historic buildings is encouraged.
- 9.1.11.** Growth can be achieved by occupying more of the site and adding floors. The Council will also support the redevelopment or refurbishment of offices and other buildings, usually built since the 1960s that are nearing the end of their useful life.
- 9.1.12.** In the future, Crossrail 2 will be a key driver of change in Wimbledon. In particular, it will open up new opportunities for creating new public space around the station and improving links across the railway lines, helping to create more space for cycling and walking and alleviating congestion currently on and around Wimbledon Bridge.
- 9.1.13.** However, at this stage it is likely that Crossrail 2 will not be completed prior to 2040, outside the lifetime of this Local Plan. Should Crossrail 2 preparation progress during the lifetime of this Local Plan, we will work with everyone in Wimbledon, including Love Wimbledon, residents, the Crossrail 2 team, Network Rail and others to ensure that the solution for Crossrail 2 at Wimbledon station is the best result for Wimbledon and Crossrail 2, not only the train service.

-
- 9.1.14.** Passengers using Wimbledon station experience congestion and it is not easy to navigate, particularly at peak times, and the look and feel of the station has not been improved even though it serves a vast number of passengers through train, tram and underground. While Crossrail 2 remains at the planning stage, we will seek greater investment in Wimbledon station and its surrounds, helping to improve the attractiveness, movement and services within the station for the increasing number of visitors.
- 9.1.15.** As set out in Policy N1. Colliers Wood, the London Plan proposes an Opportunity Area at *Wimbledon / South Wimbledon / Colliers Wood*, an indicative aim to provide 5,000 homes and 6,000 jobs. Prior to Crossrail2's opening, for the lifetime of this Local Plan it is likely that many of the opportunities for delivering new homes will be realised through the regeneration of Morden and on sites within Colliers Wood and the wider Wimbledon area.
- 9.1.16.** Wimbledon offers a range of shop types and sizes that enhance its character and distinctiveness, from smaller shopfronts that are part of South Park Gardens conservation area, fronting the Broadway to purpose built spaces such as Centre Court and Victoria Crescent. Although planning policies can't specify the brand, quality or ownership of any retailer, having a range of different sized and types of premises helps to support a greater variety of town centre offers.
- 9.1.17.** We will maintain and enhance the retail core of the centre, especially within the Primary Shopping Area around the Wimbledon Station and Centre Court Shopping Centre to ensure that the centre remains competitive and meet the needs of visitors.
- 9.1.18.** However, we recognise that consumer behaviour is changing rapidly. While this is having a seismic impact on the traditional high street retailers, improvements in the speed and management of servicing and deliveries are increasing the viability of niche stores and smaller restaurants.
- 9.1.19.** To ensure Wimbledon remains competitive and is resilient in this challenging environment, we will continue to support development which enhances the shopping offer and retail experience in Wimbledon while working with landowners to ensure that eventually all shopfronts can support a range of different activities inside the premises, whether shops, restaurants, leisure, cultural or a mix of all the above. As set out in the transport policies, we will also plan for the changes to pick-up, delivery and servicing that has come with multi-channel shopping, such as motorbike collection and drop off space.

- 9.1.20.** Wimbledon town centre accommodates the majority of major office development in the borough, presenting as an attractive location for investment in south-west London. There are two distinct clusters of office development around Wimbledon Bridge and Worple Road, and a developing cluster east of the station along The Broadway. We will continue to support the development or refurbishment of major offices in these locations, including for flexible working. Due to its location with easy access by public transport, strong, recognisable name and attractive surroundings for homes, schools, recreation and leisure, Wimbledon is expected to be a more resilient location for offices than central London should the trend be for greater flexible working.
- 9.1.21.** Despite its proximity to central London, the tennis championships and its significant leisure and cultural pursuits and associated valued status Wimbledon lacks quality hotel accommodation. Quality hotel and conference space is encouraged as a means to boost the business and tourist trade in the area and attract visitors to Wimbledon all year round.
- 9.1.22.** Evening night-time activity, including leisure, entertainment and cultural activities can play a significant role in supporting the local economy in Wimbledon and ensuring that the centre serves a wide range of users.
- 9.1.23.** A balanced approach is however needed to ensure that the competitive advantage that the night-time economy offers the centre is recognised, as well as ensuring that the potential negative impacts in relation to noise, disturbance and anti-social behaviour are addressed.

Surrounding neighbourhoods

- 9.1.24.** Wimbledon Village is a Local Centre with a unique and attractive environment: high quality physical fabric and landscaping, protected by Conservation Area designations. It has a rich heritage and period buildings, ~~a golf horse, riding trails, books fairs and horse and dog show, sett amongst the backdrop of~~with Wimbledon Common ~~nearby~~.
- 9.1.25.** Unlike other Local Centres it has few grocery stores but several high end 'chic' comparison retailers, cafés and restaurants, with business, legal and other commercial firms operating from upper floors. Wimbledon Village is not directly served by rail but is close to Wimbledon town centre.
- 9.1.26.** It attracts high quality comparison brands, however in the long term it also needs to be economically resilient and adaptable to changing consumer habits. While households in the

surrounding residential areas have very high spending power, these beautiful neighbourhoods are relatively low density so there are fewer consumers living locally than in other parts of south west London.

- 9.1.27.** Businesses in the Village attract additional footfall from visitors to the nearby attractions of Wimbledon Common and the All England Lawn Tennis Club (museum and Championships) all year round, higher during the championships. The Wimbledon Village Business Association's priorities are to promote Wimbledon Village as a commercial centre and as a visitor destination and to enhance the environment and amenity of the Village.
- 9.1.28.** The approach for Wimbledon Village is to maintain the uniqueness of the centre by supporting development that is commensurate to the scale and quality of the Local Centre.
- 9.1.29.** Arthur Road is a smaller, more compact Local Centre than Wimbledon Village, serviced by Wimbledon Park tube station on the District Line. It provides grocery and other facilities that cater for the day-to-day needs of residents. We will continue to support environmental improvements and the convenience nature of the centre.
- 9.1.30.** Haydon's Road runs from South Wimbledon to Plough Lane and is generally characterised by late Victorian terraces with later infill development. Haydons Road rail station gives access to Wimbledon, Sutton and central London. There are designated neighbourhood parades along Haydons Road but like many London arterial roads, many former shopfronts have been converted into residential uses. Merton's Shopfront Guide 2017 provides useful information for applicants to improve the restoration or design of their shopfront. Chapter 8 of the guide can be used to help design an attractive frontage at street level if the owner is converting the property into residential use. We will support planning applications that improve shopfronts and business premises along Haydons Road and improve the public realm.
- 9.1.31.** The attractive terraces immediately surrounding Wimbledon town centre, some of which are within Conservation Areas, will be protected for residential amenity by focusing town centre activity within its boundaries, and by partnership working on public protection measures including community safety and public realm improvements.
- 9.1.32.** The high-quality residential areas to the north and west of the town centre will continue to be conserved and enhanced by enforcing conservation area designations, and ensuring

that new development responds to the scale, historic value and distinctive character of these neighbourhoods.

- 9.1.33.** The wider Wimbledon area is relatively compact and close to other neighbourhoods in Colliers Wood, South Wimbledon, [Wimbledon Chase](#), Southfields, Tooting, Raynes Park, Morden, Kingston and beyond. We will encourage proposals that enhance walking and cycling across south London, requiring large sites to be permeable and support public access.

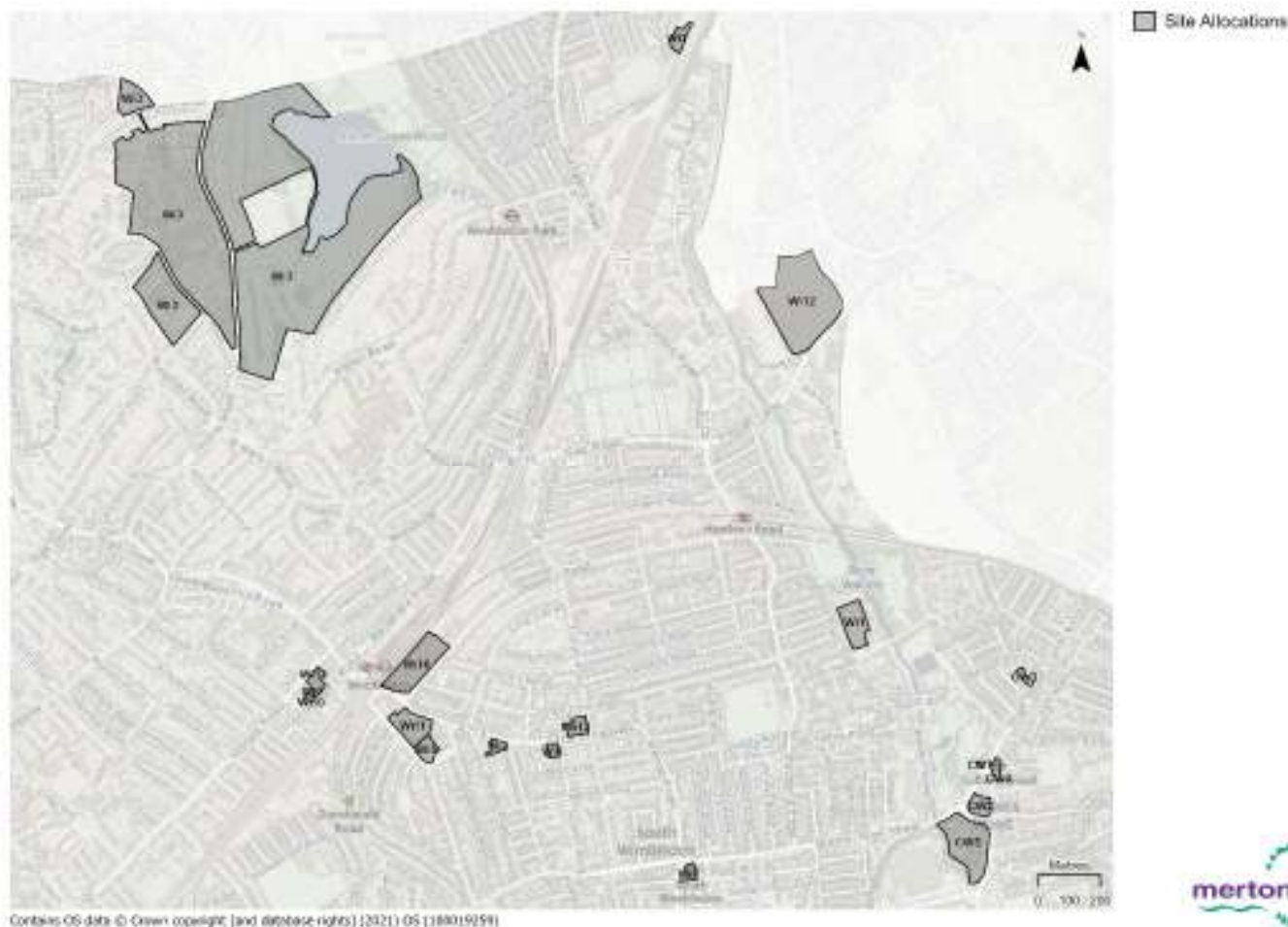
[New Para: Wimbledon Chase Neighbourhood Parade is served by a rail station but could benefit from environmental improvements. Transport improvements for the Wimbledon Chase area have already been identified, including provision of better facilities for buses, pedestrians and cyclists, with planting to improve the quality of the environment. We will continue to lobby for step free access to Wimbledon Chase train station so that all residents can make equal and effective use of their local station.](#)

- 9.1.34.** The Wimbledon Tennis Championships is a world-class sporting event and is important to Wimbledon, Merton and the UK (United Kingdom). The AELTC activities not only provide a significant economic benefit and jobs boost to Merton, London and the UK in the weeks around the Wimbledon fortnight but has benefits throughout the year. The main site acts as a draw for the 100,000 visitors to the Wimbledon tennis museum, some of whom will spend in the nearby Wimbledon town centre, Wimbledon Village and in the businesses at Arthur Road. The Raynes Park site supports free tennis coaching for Merton and Wandsworth schoolchildren and community access for residents to pay and play outside the Championships.
- 9.1.35.** We will support the continued upgrade and improvement of all AELTC's facilities to maintain its global position as the premier Grand Slam as set out in more detail in site allocation Wi3.

SITE ALLOCATIONS

Site allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site allocations will be determined against planning policies (including the London Plan). Identifying sites for a specific land use or type of development helps give certainty to what is likely to happen in that neighbourhood and helps provide homes, business space, town centre uses, infrastructure, community facilities, sports, parks and open spaces and other types of development to help meet the borough's and London's needs. These sites are contained in the development plan as site allocations.



Site Wi1: Battle Close, North Road, Wimbledon, SW19 1AQ



Ward: Trinity
Site description: The site is a large, regular shaped vacant site in a residential area, with Garfield primary school and its playground next to the north. The site is situated within a residential area, characterised by terraced housing, dating from between the early 20th century to the early 2000s. The former use of the site was a purpose-built gym (now demolished) and a large car park. To the east, south and west are two-three storey homes. The river Wandle and Wandle Park lie beyond the eastern boundary. The only site entrance lies to the south of the site with a small, vegetated traffic island partly obscuring the site entrance from the road. Until 2017 Virgin Active were the site’s leaseholders and ran the site as a private gym and fitness club. Virgin Active looked to return their leasehold to the Council as freeholder and closed the facility in December 2017. The site is approx. 10 minutes’ walk (0.4) miles from Colliers Wood underground station.
Site owner: Merton Council
Site area: 0.97
Existing uses: Vacant
Site allocation: Any of the following uses or suitable mix of community (including education), sport/leisure facilities and residential.
Site deliverability: 0-5 years

Indicative site capacity (new homes): 50 – 75 new homes

Design and accessibility guidance:

The size of the site gives rise to a variety of opportunities for different layouts of new buildings.

The site provides an excellent opportunity for the planned redevelopment of a substantial brownfield site in a residential area.

Redevelopment should protect the amenity of the adjacent residential occupiers and the primary school.

The site is classified as at risk of medium contamination from its former use for laundries and dry cleaning, however the risk will be reduced as contamination issues will have been addressed for the development of the site as a leisure centre.

Investigate the potential impact of any development on archaeological heritage. Vehicle access onto the site is restricted by the traffic island and the residential location.

Infrastructure requirements:

Development proposals for this site must [refer to the have regard to Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#)

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Despite a poor PTAL rating, the site is within easy walking distance of Haydon’s Road and Colliers Wood stations and vehicle access is through residential streets from a single access point, so parking provision could be reduced below maximum standards. The site is also located in close proximity to key routes on the cycle network including the Wandle trail and Cycle Superhighway 7, so development proposals should maximise opportunities for cycling through the provision of exemplary cycle parking provision and any required contribution towards local network improvements.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	Within the Wandle Valley/Colliers Wood Archaeological Priority Area Tier 2, and the 400m buffer of the Wandle Valley Regional Park boundary
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Fluvial Flood zone 1. All sites require sustainable drainage measures.
Is in a town centre.	No
Is in an Opportunity Area.	No

Impacts a designated open space.	No. The homes at Autumn Close act as a barrier between the site and the nearby designated open space
Impacts an ecological designation.	Not on site. Within 100m of Metropolitan Open Land and a Site of Importance for Nature Conservation at Wandle Park.
Public Transport Accessibility Level (PTAL).	PTAL 2 (poor)

Site Wi2: Broadway Car Park, Land Adjoining New Wimbledon Theatre, 111-127 The Broadway, Wimbledon, SW19



Ward: Abbey
Site description: This site is a surface car park found off The Broadway in Wimbledon town centre. Adjoining the site boundary to the west is the New Wimbledon Theatre (Grade II listed). The South Wimbledon Club and St Mary’s Primary RC School lie to the south of the site. Facing the site on the northern side of The Broadway is a shopping frontage with a series of small units. The site is surrounded by four storey buildings.
Site owner: Merton Council
Site area: 0.21ha
Existing uses: Car Park
Site allocation: a suitable mix of town centre type uses such as retail, café and restaurants, community, cultural, leisure and entertainment, offices and hotel.
Site deliverability: 0-5 years
Design and accessibility guidance: Development proposal must have regard to the Future Wimbledon SPD (Supplementary Planning Document) 2020.
The site boundary is adjoined to the west by the Grade II listed building, New Wimbledon Theatre. Development proposals will need to be sensitively designed to show how they conserve and enhance the significance landmark of the New Wimbledon Theatre.

Development proposals must create an active frontage to enhance the town centre.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the critical drainage area.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA (Opportunity Area) is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

The developer should contact SGN (Southern Gas Networks) and Thames Water to discuss requirements for any improvements to the water, wastewater and gas infrastructure network from non-residential development.

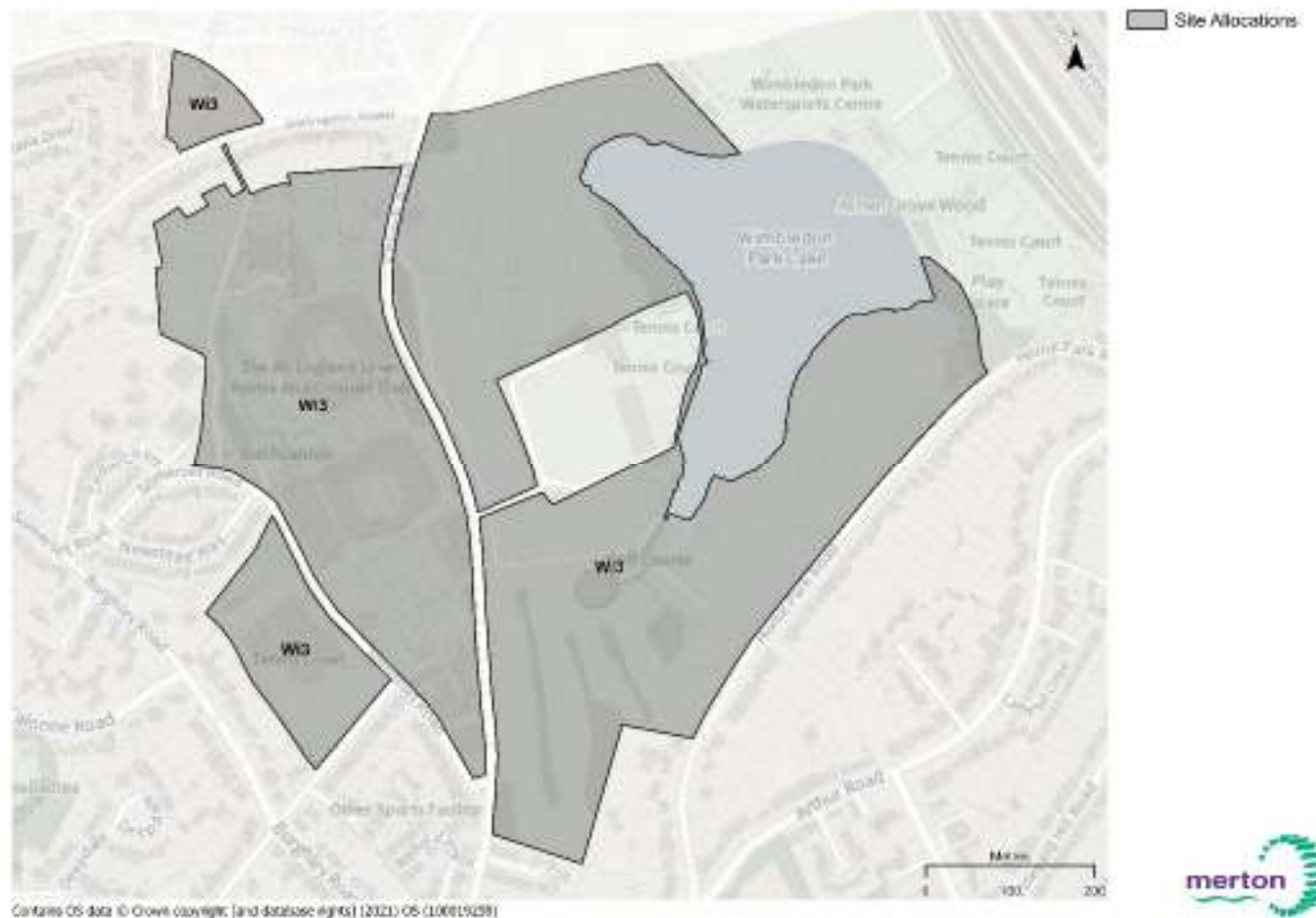
This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

A cycle hanger for use by local residents is located on the eastern boundary of the site. Development proposals should protect and enhance publicly available cycle parking provision.

The site location	
Approach to taller buildings.	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and <u>in-line with the height parameters set out in having regard to</u> the Future Wimbledon SPD
Impacts on Listed Buildings or undesignated heritage assets.	Adjacent Grade II listed building New Wimbledon Theatre
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
In a Flood Zone.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

Site Wi3: All England Lawn Tennis Club - Church Road, Wimbledon, SW19 5AE



Ward	Wimbledon Park
Site description	<p>The All England Lawn Tennis and Croquet Club site, and specifically the Wimbledon Championships has long been internationally recognised as the premier tennis tournament in the world on grass. This long-established competitive tennis venue is the reason that “Wimbledon” is an internationally recognised and valued brand.</p> <p>The site is the All England Lawn Tennis Club (AELTC), an internationally recognised tennis venue with 18 outdoor and indoor tennis courts and supporting hospitality, offices, catering, press, players, security etc in a series of buildings and structures across the site.</p> <p>The site is occupied all year around but is used intensively and in its entirety during the two weeks of the Wimbledon Championships when it employs more than 10,000 people on-site, is visited by more than 500,000 spectators and broadcast to more than a billion people in +200 countries. The combined annual economic activity associated with The Championships and the activities of the AELTC was estimated in 2015 to be £180m for London and £280m for the UK (based on figures provided by AELTC).</p> <p>The main site is approximately 14 ha, with a smaller site of approximately 3ha across Somerset Road housing covered courts to the west and 22 grass courts in a site to the north; all of which are part of the AELTC site.</p>

	<p>Wimbledon Park, including Wimbledon Park Lake, lies at the other side of Church Road to the east of the site. The remaining surrounding area are made up of detached, semi-detached and terraced homes, many set in large plots in tree-lined streets.</p> <p>AELTC now owns the former golf course in Wimbledon Park and proposes that this becomes part of the hosting estate for the Wimbledon Championships, enabling the entire site to support the qualifying rounds and the Championships themselves by 2030.</p> <p>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.</p> <p>The AELTC have commenced the preparation of an updated masterplan new masterplan to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course. In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council.</p>
Site owner	All England Lawn Tennis and Croquet Club
Site area	17.83 44 hectares
Existing use	<p>Part of the AELTC estate used mainly between May to September and intensively during the two weeks of the internationally recognised Wimbledon Championships.</p> <p>Outside The Championships period the site remains in use for member, club and charitable activities and includes the AELTC’s Wimbledon Lawn Tennis Museum which attracts 100,000 visitors per year.</p> <p>Wimbledon Park Golf course is currently an 18-hole golf course with club house and maintenance facilities with no public access other than in line with golf club membership rules. This use will cease from January 2022.</p>
site allocation	World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake.
Site deliverability	5-10 years
Design and accessibility guidance:	<p>Development of the site provide an opportunity to master planning the golf course land to create environmental, social and economic benefits to the wider area, to host more sporting activities, upgrade and improve AELTC’s facilities to continue the prominence of The Championships and the opportunity to host more of the pre-Championship activities within Merton including the qualifying event. Other opportunities benefits are:</p> <ul style="list-style-type: none"> • Make the most of the substantial economic benefits (directly and indirectly) of the site for the borough and for London. • In combination with the AELTC Raynes Park site, to support the capacity of the Wimbledon Junior Tennis Initiative, in providing better facilities for the free tennis coaching programme for primary school aged children in Merton

	<p>and Wandsworth schools.</p> <ul style="list-style-type: none"> Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian <u>and cycle</u> access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England’s “heritage at risk” register by AELTC (<u>the landowner of the</u> former golf course <u>landowner</u>) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park. <p>Development proposal must respect the site’s historic setting including the views to St Mary’s Church and the surrounding area and the views from the Grade II listed Wimbledon Park.</p> <p>Development proposal will need to investigate the potential impact of the proposed development on archaeological heritage.</p>
<p>Infrastructure requirements.</p>	<p><u>The AELTC site is used in a highly intensive manner, usually for less than two months per year, and relatively little outside the tennis grass court season given its size and scale. Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of any unusual usage patterns prevalent at the time and predicted for its future use.</u></p> <p>Development proposals for this site must <u>refer to the have regard to Merton’s Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal and Green Infrastructure Study 2020.</u></p> <p>Transport for London are engaged in the master planning of the site and may have infrastructure requirements relating to the amended use of the former golf course site. A travel plan will also be required to incorporate all the AELTC’s landholdings and the Championships, which should support how people access the site in a sustainable way.</p> <p>The developer should contact Thames Water and SGN (Southern Gas Networks) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.</p> <p>This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.</p> <p>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.</p>
<p>The site location</p>	
<p>Impacts Listed Buildings or undesignated heritage assets.</p>	<p>Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and the Wimbledon Club (privately owned) are the remains of a 18th century Capability Brown designed landscape which is now a Grade II listed Historic Park and is on the “heritage at risk register”. Various listed buildings and structures are also</p>

	visible from the site.
Impacts a Conservation Area.	Yes. The north end of the <u>existing tennis</u> site sits within Bathgate Road conservation area. <u>The wholeA part</u> of the site is within an <u>aArchaeological pPriority zoneArea</u> . Wimbledon <u>N</u> orth conservation area <u>covers lies to</u> the west of the site <u>(Wimbledon Park) and lies to the south of the site.</u>
Impacts an Archaeological Priority Area.	Yes
Impacts a Scheduled Ancient Monument.	No
In a Flood Zone.	No, however the AELTC owned land at the golf course borders Wimbledon Park Lake, a key part of the man-made historic landscape features which is also a Category A reservoir (regulated by the Environment Agency). Merton Council are undertaking improvements to Lake and the raised dam to ensure compliance with the Reservoirs Act.
Is in a town centre.	no
Is in an Opportunity Area.	no
Impacts a designated open space.	Yes, Open Land and designated open space.
Impacts ecology designations.	Yes, the golf course and surrounding land and lake are designated as Sites of Importance for Nature Conservation and green corridors.
Public Transport Accessibility Level (PTAL).	PTAL 2 poor access to public transport

Site Wi5: Hartfield Road Car Park, 42-64 Hartfield Road, Wimbledon, SW19 3RG



Ward: Dundonald
Site description: This site forms a surface car park and is next to the Sir Cyril Black Way bus interchange. There is dual pedestrian access to the car park from The Broadway and Sir Cyril Black Way and vehicular access is obtained from Hartfield Road. To the north is Victoria Crescent (also proposed as a site allocation Wi11 in this Local Plan) containing purpose-built retail units fronting Wimbledon Broadway (including Morrison’s supermarket, Uniqlo). Nearby are a wide range of town centre type uses including shops, offices, café and restaurants, leisure, recreation and residential uses.
The site is found within the Wimbledon town centre boundary and the surrounding buildings have a range of building heights, from tall commercial premises to the north to the two-storey residential houses in Ashbourne Terrace to the east. The site is close to although not wholly visible from, The Broadway and Wimbledon station (c100m). The south of the site faces residential properties at the other side of Hartfield Road.
There are a range of building heights and differing built character next to the site and the adjacent site is allocated for redevelopment as Site Wi11 in this Local Plan.
Site owner: Merton Council
Site area: 0.45ha
Existing uses: Surface car park
Site allocation: A mix of uses appropriate to a town centre including retail, offices, assembly and

leisure and hotel. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability.

Site deliverability: 5-10 years

Design and accessibility guidance:

Development proposals need to have regard to the Future Wimbledon SPD (Supplementary Planning Document) 2020.

The site to the north (Victoria Crescent) is also proposed for allocation by its freeholder in this Local Plan as site Wi11). A comprehensive redevelopment of this site and site Wi11 together could optimise development on both sites and provide much-needed public space in the heart of Wimbledon town centre.

The pedestrian route from the car park and The Broadway is found within the Wimbledon Broadway conservation area.

Hartfield Road and Sir Cyril Black Way suffer from congestion at peak times. A small part of the southern corner of the site is within a critical drainage.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the critical drainage area.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure Requirements:

Development proposals for this site must ~~refer to the have regard to~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

A connection for pedestrians and cyclists between The Broadway and Hartfield Road should be maintained through the site.

TfL (Transport for London) requests that redevelopment of this site does not prejudice access to or the operational efficiency of the adjoining bus interchange. The Council recommends the developer engages with TfL Buses prior to the submission of a planning application. The Council will need evidence of engagement with TfL as part of any submitted planning application.

Thames Water have indicated that the scale of development for this site is likely to require upgrades of the water supply network infrastructure, but they do not have concerns about the wastewater network or wastewater treatment infrastructure capability. It is recommended that the developer engages with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton

Council will also engage with and seek advice from Thames Water about the development of this site.

The site location

Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon Supplementary Planning Document (SPD).
Impacts Listed Buildings or undesignated heritage assets.	New Wimbledon Theatre on Wimbledon Broadway is a Grade II listed building,
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
In a Flood Zone.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

Site Wi6; Highlands House, 165-171 The Broadway, Wimbledon, SW19 1NE



Ward: Abbey
Site description: The site is occupied by a mix of retail and offices within a 1960's style building that has a maximum height of seven storeys. The upper floors of the building are currently set back from the street line in a podium-block format. The site is a corner site between. The Broadway and Southey Road. To the south of the site are residential terraces. On the opposite side of The Broadway are similar mixed-use developments with a range of building heights from three to six storeys. The site is found within Wimbledon town centre and is next to mixed use developments of retail, offices and residential uses.
This is a significant corner site with an active frontage facing onto The Broadway.
Site owner: ORION and BFL Management Ltd.
Site area: 0.16ha.
Existing uses: Retail, commercial and flexi office use
Site allocation: A suitable mix of retail, financial and professional services restaurants cafes, drinking establishments, offices, community (including health/day centre), sporting/leisure use, residential and hotel.
Site deliverability: Private ownership. 10-15 years
Design and accessibility guidance:

Development proposals must have regard to the Future Wimbledon Supplementary Planning Document (SPD).

Development of this site must be of exemplary design providing a high-quality office space on upper floors. In a mixed-use development residential uses should be on the upper floors. The ground floor should have an active frontage, respecting the dual aspect and the corner site.

Development of the site provides an opportunity to make better use of this site in a well-connected town centre location, including upgrading the commercial space and public realm/frontage to The Broadway and Southey Road.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the critical drainage area.

Servicing facilities should be provided on site to minimise impacts on traffic movement, congestion and road safety. Mitigate and manage impacts of parking on neighbourhood and local amenity.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure Requirements:

Development proposals for this site must refer to the ~~have regard to~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

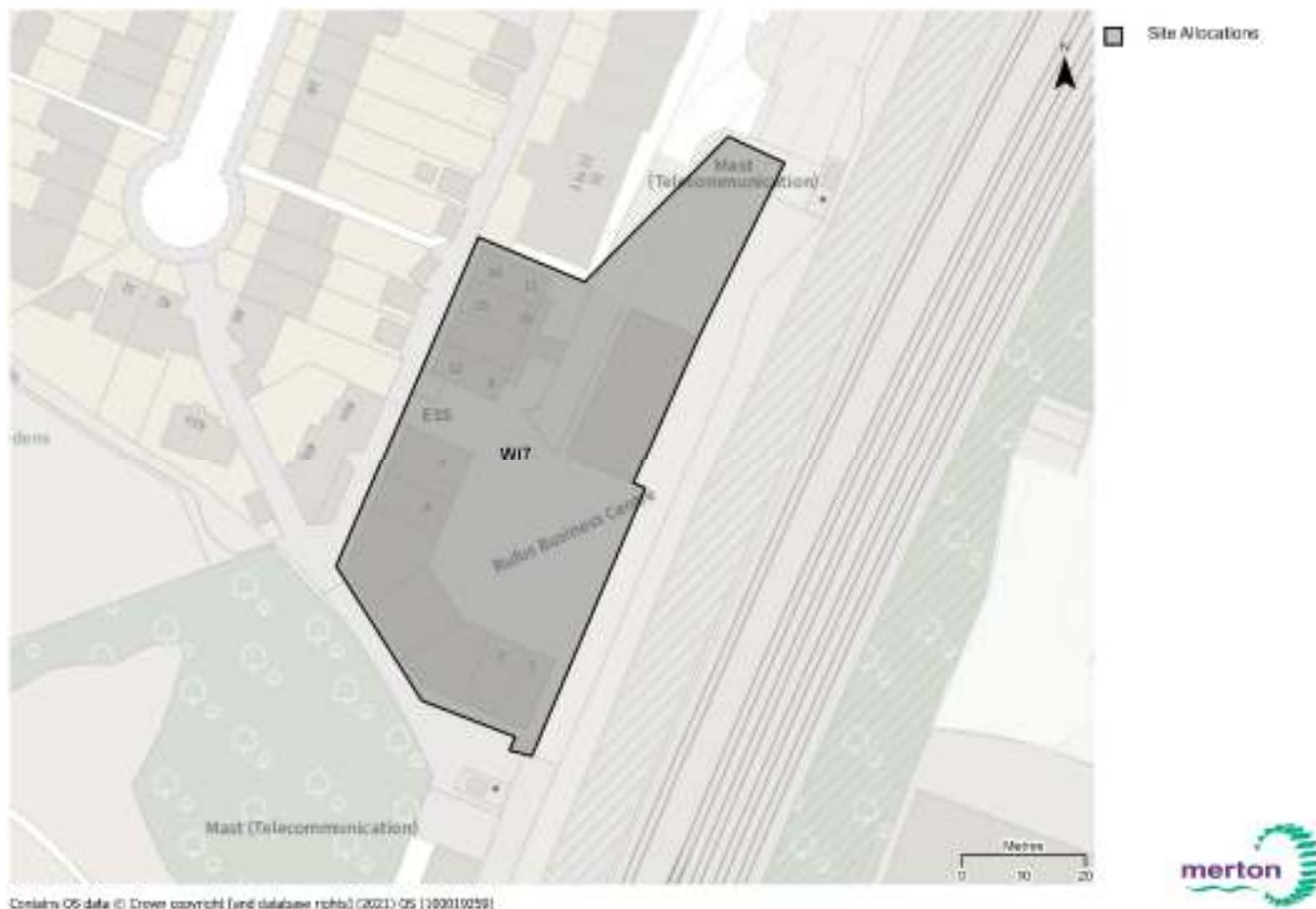
This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek advice from Thames Water about the development of this site.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon Supplementary Planning Document (SPD).
Impacts Listed Buildings or undesignated heritage assets.	Grade II listed Wimbledon Theatre is visible further up The Broadway.
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No.
Impacts a Scheduled Ancient Monument.	No.

Impacts on flooding from all sources.	Area susceptible to surface water flooding
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No.
Impacts on an ecology designation.	No.
Public Transport Accessibility Level (PTAL).	PTAL 6, excellent public transport access.

Site Wi7: Rufus Business Centre, Ravensbury Terrace, Wimbledon Park, SW18 4RL

Ward: Wimbledon Park

Site description:

The Rufus business estate is a small site with residential neighbours in close proximity and a shared single access point for vehicles and pedestrians via Ravensbury Terrace through a site known as Haslemere **Industrial** Estate, which has been redeveloped for 139 homes, 1,100sqm of office floorspace and associated servicing, laid out on either side of the site (permission reference 16/P2672).

The site is situated near the northern boundary of Merton and is close to Wandsworth boundary. The site is adjacent to the railway lines to the east and residential to the west. The west of the site is bounded mostly by the gardens of short residential terraces on Dawlish Avenue with one existing residential property abutting the site. To the south is a strip of private land and then Durnsford Road Recreation Grounds although access to these recreation grounds is via Ravensbury Terrace to the north.

The site is occupied by several businesses and has capacity for c17 workshop and light industrial businesses.

There is a single access from Ravensbury Terrace which runs through Haslemere industrial estate.

The site has moderate access to public transport and lies within 10 minutes' walk of Earlsfield train station. However, pedestrian and vehicle access to the site is down a single passageway off Ravensbury Terrace, shared with the development at 12a Ravensbury Terrace and

through Haslemere ~~industrial~~ estate.

In May 2020 a planning application (reference 21/P1780) was submitted for the redevelopment of the site to provide 96 homes and 880 square metres of commercial floorspace.

Site owner: Astranta General Partner Ltd

Site area: 0.2ha

Existing uses: Commercial uses, predominantly storage

Site allocation: allocated as a mixed-use development consisting of both employment (business/light industrial and residential uses.

Deliverability: 0-5 years

Indicative site capacity (new homes): 90-106 new homes

Design and accessibility guidance:

Development of the site must be co-ordinated with the adjacent planning permission on the Haslemere estate (reference 16/P2672); construction of Haslemere will be complete prior to planning permission on this site Wi7.

Development proposals will need to have regard to the Crossrail2 safeguarding on the eastern side of the site.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain to minimise flood risk for future occupiers and the potential for water pollution from this site. This includes incorporating the recommendations for this site in Merton's Strategic Flood Risk Assessment Level 2.

To ensure safe and secure access for pedestrians, vehicles and emergency vehicles in perpetuity, access must be co-ordinated in perpetuity with the adjoining site at Haslemere estate (ref 16/P2672).

Due to the heavily restricted access particularly for emergency vehicles, development proposals involving residential will need to be brought forward and closely co-ordinated with the redevelopment of Haslemere estate. This would also address access and egress issues associated with the functional floodplain covering much of the site.

Mitigating potential access, parking, traffic and safety impacts on neighbouring streets and local amenity, particularly the adjacent residential development.

The site's restricted access and location beside railway lines and within a residential area will require a detailed Construction and Environmental Management Plan and construction methods that minimise noise, disturbance and traffic movements to be used.

The site may be contaminated due to its previous industrial uses; however, risk will have been reduced as the site has already been redeveloped for business space.

Infrastructure Requirements:

Development proposals for this site must refer to the ~~have regard to~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. Proposals will be required to explore the opportunity to improve pedestrian and

cycle access between the Wandle Trail and Durnsford Recreation Ground, in accordance with the active travel policies.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The site is adjacent to rail tracks used by the District line and land safeguarded for Crossrail2. Transport for London requires that London Underground Infrastructure Protection, Network Rail and the Crossrail2 team should be fully consulted about any works or development proposals that may impact on rail infrastructure. The Council will need evidence that the developer has engaged with London Underground and Network Rail as part of a planning application.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

~~Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>~~

The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

	The site location
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	A small part of the site to the north site in an Archaeological Priority Area
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Yes, flood zone 2 and 3.
Is in a town centre.	No
Impacts a designated open space.	No, however the site is within 400m of the Wandle Valley Regional Park
Impacts on an ecology designation.	Yes. The eastern boundary of the site (against the railway sidings) is designated as a Site of Importance for Nature Conservation and green corridors.
Public Transport Accessibility Level (PTAL).	PTAL Level 4. Moderate access to public transport

Site Wi8: South Wimbledon Station, Morden Road, South Wimbledon, SW19 3DB



Ward: Abbey

Site description:

The site is an important, highly visible landmark within the proposed new South Wimbledon Local Centre. The site is a part single storey / part two storey Northern line underground station, with pedestrian access from the corner of South Wimbledon junction. The façade of the building is clad in Portland stone and the building is of the distinctive Charles Holden design. The building is two storeys to the rear and built with London brick. The site has Transport for London operational offices and shop units, found on the corner two strategic roads Morden Road and Merton High Street.

To the south of the main building within part of the curtilage of the site there is a small car park and

shed, that is currently occupied by a car hire firm. The Kilkenny Tavern lies to the east of the site, fronting Merton High Street Beyond this the sites are surrounded to the south and east by the High Path Estate which is part of a regeneration programme being led by the freeholder Clarion Housing Group.

The site is surrounded by proposals for the regeneration of High Path estate, guided by the Estates Local Plan and with an Outline Planning Application 17/P1721 resolved for approval in March 2018. (The site lies outside but next to both the Local Plan and the Outline Planning Application).

Site owner: Transport for London

Site area: 0.21ha

Existing uses: Underground Station and commercial premises (coffee shop and local convenience store)

Site allocation: Retaining the underground station and residential or residential mixed-use retail, financial services and professional, cafes and restaurants, public house and offices.

Site deliverability: 10-15 years

Indicative site capacity (new homes): TBC

Design and accessibility guidance:

Development of the site provides several opportunities to delivery of new homes in an accessible sustainable location, providing new services and homes at a landmark location in the new South Wimbledon local centre.

Development proposal must respect and enhance the Grade II listed heritage asset of South Wimbledon Station and other local heritage assets within the area. There is an opportunity to compliment the Charles Holden designed listed London Underground station.

Development proposal should explore the opportunity to create a secondary entrance to the Underground station and a small public space to the rear of the site, both situated away from the busy South Wimbledon junction. This would help improve the resilience of the station, provide greater permeability and movement options for people travelling to and from the station and create a small space to pause away from the busy junction. Opportunity to engage with and neighbouring landowners, (Clarion Housing Group) to coordinate on design, streetscape and optimise both sites for the delivery of new homes.

Development proposal must incorporate recommendation within Merton’s Strategic Flood Risk Assessment to address the issues associated with the location within a flood zone.

An investigation of the potential impact of any development on archaeological heritage is needed.

The site is within 50m of London Underground subsurface tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our Opportunity Area, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the Opportunity Area is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

Development proposals for this site must [refer to the have regard to Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.](#)

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site playspace provision in accordance with the infrastructure policies and London Plan.

Development proposals should provide high quality secure cycle storage for commuters in addition to and separate from residential cycle parking provision.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek advice from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	South Wimbledon station building is Grade II listed, one of several Charles Holden designed purpose-built London Underground station buildings.
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Site partially in Flood Zone 2 and in a critical drainage area
Is in a town centre.	No
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6, excellent access to public transport

Site Wi9: 28 St George’s Road, Wimbledon, SW19 4DP



Ward: Hillside
Site description: This site is currently vacant. It held the former Wimbledon community centre, which was vacated during 2012 and demolished in summer 2013. It is surrounded to the east by four to five storey mixed use buildings (commercial/offices), to the west by four storey offices and to the south by office buildings ranging from five to nine storey in height.
Site owner: Merton Council
Site area: 0.06ha
Existing uses: This site has been vacant since 2013. It is surrounded to the east by four to five storey mixed use buildings (commercial/offices), to the west by four storey offices and to the south by office buildings ranging from five to nine storey in height.
Site allocation: a suitable mix of town centre type uses such as community use, retail, financial and professional services, offices, hotel and residential.
Indicative site capacity (new homes):
Site deliverability: 0-5 years
Design and accessibility guidance: Development of the site provide an opportunity for a co-ordinated approach to design and delivery from four sites proposed in this plan: Wi9, Wi10, and Wi13 and Wi14 Development proposals must have regard to the Future Wimbledon Supplementary Planning Document (SPD).

Development of the site provides an opportunity to provide modern floorspace for businesses, complementing the surrounding area and provide an active street frontage to contribute towards the vibrancy and vitality of Wimbledon town centre.

Development proposals must protect the amenity of occupiers next to the site.

Development proposals will need to provide an active street frontage to contribute towards the vibrancy and vitality of the town centre. In a mixed-use development, residential uses should be on upper floors.

The development proposal must manage and mitigate the parking and servicing impacts on traffic movement, congestion and road safety.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Development proposals must address issues associated with localised surface water flooding and the critical drainage area.

Infrastructure requirements:

Development proposals for this site must ~~refer to the~~ ~~have regard to~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

Proposals should improve the public realm and pedestrian and cycling facilities around the site.

The developer should contact Thames Water and SGN to discuss requirements for any improvements to the water, wastewater and gas infrastructure network arising from their proposals.

The site location

Approach to tall buildings	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in having regard to the Future Wimbledon SPD (Supplementary Planning Document)
Impacts Listed Buildings or undesignated heritage assets.	Yes.
Impacts a Conservation Area.	Yes
Impacts an Archaeological Priority Area.	Yes.
Impacts a Scheduled Ancient Monument.	No.
Impact on flooding from all sources.	Yes, site is within a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6b, excellent access to public transport.

Site Wi10: Prospect House, 30 St George’s Road, Wimbledon, SW19 4BD



Ward: Hillside
Site description: The 4-story office building is part of a large block of commercial development between Worple Road and St George’s Road, with varying building heights, uses, designs and land ownership. It is surrounded to the west and north by other 4 storey office blocks and to the south by offices ranging from five to nine storeys in height. To the north east of the site lies the vacant site at 28 St George’s Road, also proposed for redevelopment in this plan. The site lies in a commercial area of Wimbledon town centre. Opposite is Tuition House, a substantial office block housing many businesses. The adjacent site 1-4 Francis Grove has a planning proposal for office redevelopment (planning reference 19/P3814).
Site owner: Henderson UK (United Kingdom) Property PAIF and T H Real Estate
Site area: 0.05ha
Existing uses: Offices
Site allocation: Offices or hotel.
Site deliverability: 0-5 years
Design and accessibility guidance: Opportunity for a co-ordinated approach to design and development delivery with the following site allocations - Wi9, Wi10, and Wi13 and Wi14 as set out in the London Plan.
Development proposals must have regard to the design led Future Wimbledon Supplementary Planning Document (SPD).

Development proposals will need to provide an active street frontage along St George’s Road to contribute towards the vibrancy and vitality of the town centre.

Provide well-designed modern commercial floorspace to support businesses and create jobs in Wimbledon.

Development proposals must address issues associated with localised surface water flooding and the critical drainage area.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure Requirements:

Development proposals for this site must ~~refer to the have regard to~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact Thames Water and SGN to discuss requirements for any improvements to the water, wastewater and gas infrastructure network arising from their proposals.

Proposals should improve the public realm and pedestrian and cycling facilities around the site.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	Within the Wimbledon Village Archaeological Priority Zone <u>No</u>
Impacts a Scheduled Ancient Monument.	No
Impact on flooding from all sources.	Site within a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

Site Wi11: Victoria Crescent, 39-59 The Broadway, 1-11 Victoria Crescent, Wimbledon, SW19 3RG



Ward: Dundonald

Site description: The site sits in the heart of Wimbledon town centre with core shopping frontage facing The Broadway and Wimbledon station. It is prominent within the town centre and is highly visible from the eastern exit of Wimbledon station.

Together with Wimbledon Bridge House, it is one of the few purpose-built premises having street frontage space of a standard size for larger retailers. It holds a significant amount of retail and leisure floorspace. The Piazza is one of the few public spaces in Wimbledon town centre and is periodically used by food markets and for events such as Love Wimbledon summer tennis screenings and Winter Wonderland.

To the north of the site [and](#) on the other side of The Broadway lies [South Park Gardens The Broadway Conservation Area](#) with multiple small shopping frontages occupied by a range of shops and services.

The site is divided into two main buildings, laid out in a crescent shape with a piazza fronting The Broadway and residential walkway running from The Broadway through to Hartfield Road. Both parts of the site consist of commercial units on the ground and upper floors. The south-eastern side of the crescent is occupied by Morrison's supermarket on the ground floor and purpose-built large shopfronts leading west, occupied by

brand retailers and ancillary offices and storage above. Hartfield Road and Sir Cyril Black Way (the back of the site) suffers from congestion at peak times.

This unit backs onto a Council owned car park off Hartfield Road, known as P3, which is also proposed for redevelopment. The western side of the crescent is occupied by Odeon cinema on the upper floors with a variety of shopfronts on the ground floor, occupied by food and drink uses.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Site owner: Owned by F&C Commercial Property Holdings Ltd and asset managed on their behalf by BMO Real Estate Partners

Site area: 1 hectare (approx.)

Existing uses: Mixed use retail and leisure.

Site allocation: A mix of **Town Centre Type Uses** including retail, **cafes and restaurants** pub or drinking establishment, financial and professional services, assembly and leisure, hotels **and offices** with the re-provision of public realm. The priority for the site should be **Town Centre Type Uses**. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability.

Site deliverability: .5-10 years

Design and accessibility guidance:

The development is subject to occupational leases and as these come up for renewal, the landowners have identified the opportunity for phased mixed-use redevelopment of the site.

Development proposals must have regard to the design led Future Wimbledon Supplementary Planning Document (SPD).

Development of the site provide an opportunity to deliver a comprehensive redevelopment together with the council-owned adjacent Hartfield Road car park to optimise the site layout, access, design and use.

Development proposals must recognise the sites proximity to nearby site allocations (Hartfield Road and Victoria Crescent) and provide new purpose-built town centre uses to support businesses, jobs and cultural activities, and re-providing much needed public space.

Development proposals must recognise the site's proximity to and must consider the setting of nearby heritage assets.

Development proposals must provide enhanced accessibility to bus stops and links to cycle routes.

Any servicing facilities must be provided on site to minimise impacts on traffic movement, congestion and safety.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

Development proposals for this site must **refer to the ~~have regard to~~ Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.**

The new layout of the site must facilitate pedestrian access from The Broadway to Hartfield Road including to consider accommodating cyclists and to link better to the surrounding cycle and pedestrian networks particularly by supporting a north-south link through the town centre.

Provide enhanced public cycle parking facilities and make provision to accommodate cycle/ scooter hire

schemes.

There is an opportunity to provide enhanced public cycle parking facilities, including a secure hub for commuters and make provision to accommodate cycle/ scooter hire schemes.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

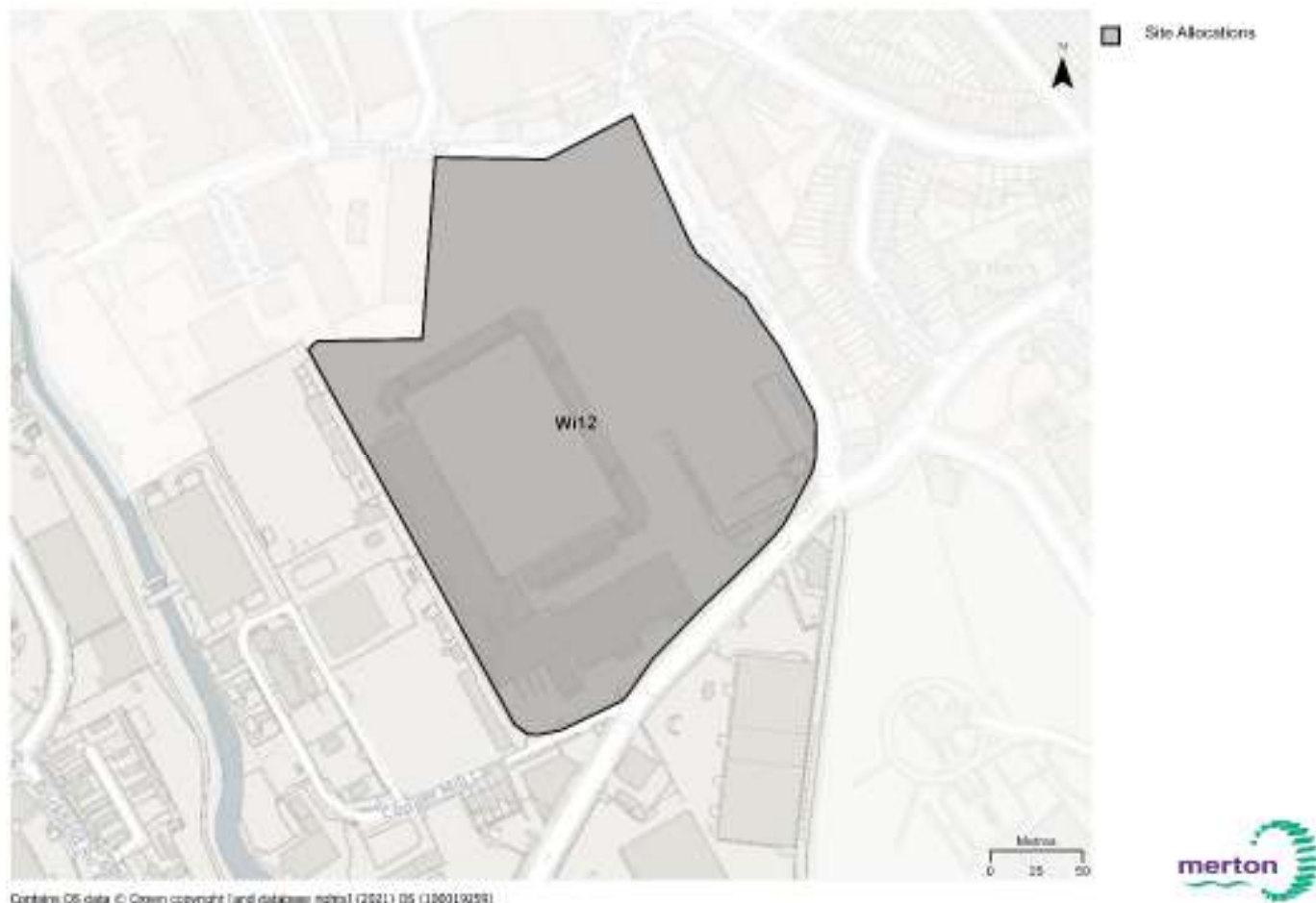
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	The frontage of the site is within the setting of listed former town hall and Grade II listed Wimbledon Theatre.
Impacts a Conservation Area.	Yes
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
Impacts from flooding from all sources.	Yes, site is within a critical drainage area.
Is in a town centre.	Yes, Wimbledon town centre.
Is in an Opportunity Area.	Yes, designated in the London Plan.
Impacts a designated open space.	No
Impacts on an ecology designation.	No.
Public Transport Accessibility Level (PTAL).	PTAL 6b, excellent access to public transport.

Site Wi12: Wimbledon Stadium and Volante Site - Plough Lane and Summerstown Road, Wimbledon Park, SW17 OBH



Ward: Wimbledon Park

Site description: The site is surrounded by strategic industrial locations (all sides). The proximity of the waste management site to the north west.

To the north and east of the site is Summerstown Road strategic industrial location (London Borough of Wandsworth), which includes a waste management site to the northwest. To the south and west is part of Durnsford Road/Plough Lane strategic industrial location (London Borough of Merton).

Most of the site (stadium, squash and fitness, shop and homes) is due to complete constriction in late 2021 (main planning permission references 14/P4381 and 18/P3354). Planning permission 15/P4798 applies to the portion of the site formerly known as the Volante land fronting Summerstown Road.

The site and buildings on the eastern boundary are in separate ownership fronting Summerstown road in Wandsworth with planning permission including residential development. (Reference 15/P4798)

The site adjoins businesses along the northern and eastern boundary within the London Borough of Wandsworth. To the south of the site in Merton on the other side of Plough Lane is an industrial estate (Garrett Park) which is part of a Business Improvement District.

Running along the western boundary of the site is a large operational electricity substation owned by National Grid. National Grid has also advised that this is unlikely to extend into the boundary of this site.

Site owners: Privately owned – various landowners.

Site area: 5.29 hectares

Site allocation: Intensification of sporting activity with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation (same allocation as Merton's Sites and Policies Plan 2014 site 37. The Council proposes to continue with the site allocation to give certainty to the multiple landowners and surrounding business and residential occupiers that it continues to support the allocated use.

Most of the site (stadium, squash and fitness, shop and homes) is due to complete construction in late 2021 (main planning permission references 14/P4381 and 18/P3354). Planning permission 15/P4798 applies to the portion of the site formerly known as the Volante land fronting Summerstown Road.

Indicative site capacity (new homes): 700-750 new homes across all ownerships

Site deliverability: 0-5 years (the majority of the site – 634 homes - due to be completed by the end of 2021). Approximately two thirds of the site is due to complete construction in 2021 associated with the delivery of planning permission reference 14/P4381, 18/P3354 and associated applications for a variety of uses including a football stadium for AFC Wimbledon, +600 homes and other facilities.

Design and accessibility guidance:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Development of the site provides an opportunity to deliver sporting intensification with enabling development on a large brownfield site is being exercised by the landowners.

Development proposals should seek to improve the accessibility opportunities to improve bus infrastructure, walking and cycling facilities to and from the site and provide improved links to Wimbledon town centre.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain and with the critical drainage area to minimise flood risk for future occupiers and the potential for water pollution from the site. A flood risk assessment will be required as set out in the NPPF and should also consider the treatment of the non-main rivers that pass through the site and incorporate sustainable drainage systems into development proposals. The design and layout must incorporate the recommendation of Merton's Strategic Flood Risk Assessment

Development proposal should seek to resolve and improve the road network capacity, movement and local safety concerns.

Redevelopment proposals should take account of the electricity substation to the west of the site to minimise the effects on amenity of future occupiers.

Development proposals must investigate the potential impact of any proposed development on archaeological heritage.

Facilitating improved accessibility including improving bus infrastructure, walking and cycling facilities. Resolving road network capacity, movement and safety concerns. Site access arrangements require careful scrutiny/improvement.

A squash and fitness club existed on the site. Proposals should include the provision for an equivalent or enhanced squash and fitness club as part of sporting intensification.

Infrastructure requirements:

Development proposals for this site must refer to the have regard to Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal. and Green Infrastructure Study

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years, 5-11 years and 12+ years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

This site is in close proximity to National Grid infrastructure 33Kv Underground Cable route Earlsfield Rail Feeders 427, 440 & 443 Section 3 and 33Kv Underground Cable route Wimbledon 33Kv D S/S Electrical Substation Wimbledon 132KV. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandale Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Thames Water have indicated that the scale of development for this site that, upgrades of the water supply network infrastructure and wastewater network are likely. It is recommended that the developer with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council needs as part of any submitted planning application evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site location

Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape.
Impacts Listed Buildings or undesignated heritage assets.	No

Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	Yes, the entire site.
Impacts a Scheduled Ancient Monument.	No
Impacts from flooding from all sources.	Yes, the site and its surrounds are within the functional floodplain of the River Wandle (Flood Zone 3a). The majority of the site is within a critical drainage area for surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area.	No
Impacts a designated open space.	Yes, within Wandle Valley Regional Park 400m buffer zone.
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 2/3 poor/moderate accessibility to public transport (PTAL 2/3).

Site Wi13: 8-20 Worple Road and 20-26 St George's Road Wimbledon SW19 4DD



Ward: Hillside

Site description: The site is a Sainsbury's supermarket with car park. The site is part of a large block of commercial development sites between Worple Road and St George's Road, with varying building heights, uses, designs and land ownership. The site has frontage onto both Worple Road and St George's Road, Elys department store adjoins the north east boundary of the site, fronting Wimbledon Hill Road and Worple Road. Offices in Barry House connect the north east of the site fronting St George's Road. Offices, a gym and shops lie opposite the site.

Site owner: Eskmuir Group

Site area: 0.22ha

Existing uses: Supermarket with ancillary car parking, and offices

Site allocation: A mix of town centre types uses such as retail, financial and professional services, offices, hotel or community (including health/day centre), residential on upper floors to enable commercial led development.

Site deliverability: 5-10 years

Indicative site capacity (new homes):

Design and accessibility guidance:

Opportunity for a co-ordinated approach to design and delivery from four sites proposed in this plan: Wi9, Wi10 and Wi13 and Wi14.

Development proposals must have regard to design led Future Wimbledon Supplementary Planning Document.

The site provides an opportunity to deliver a well-designed modern commercial floorspace to support businesses and create job opportunities within Wimbledon town centre.

Development proposals must provide an active street frontage along either Worple Road or St George’s Road to contribute towards the vibrancy and vitality of the town centre.

Development proposals must address and manage parking, improve road safety, traffic movement, reduce or minimise congestion around the site and nearby roads.

Provide a new pedestrian route to improve permeability in this area that connect Worple Road and St George’s Road, breaking up the existing large block.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Proposals should improve the public realm and pedestrian and cycling facilities around the site.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

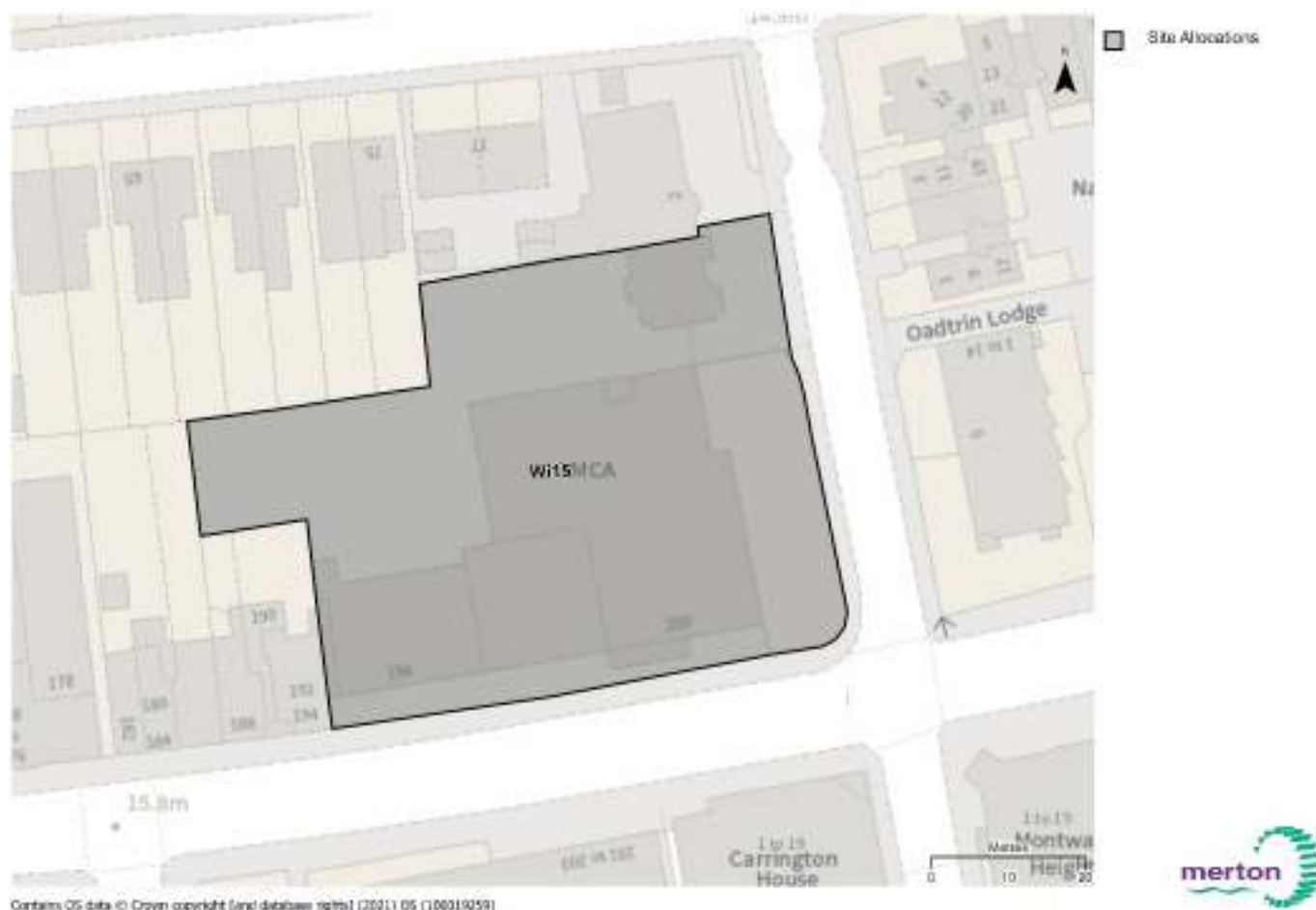
This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No

Impacts an Archaeological Priority Area.	Within the Wimbledon Village Archaeological Priority Zone <u>No</u>
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Yes, site is in a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

Site Wi15: YMCA Wimbledon 196-200 The Broadway, Wimbledon, SW19 1RY



Ward: Trinity

Site description: The site is in use as a YMCA with a wide range of uses, including a youth advice centre with hostel space and a café. The buildings on site range up to eight storeys with seven storeys fronting The Broadway.

The site is a prominent corner site with an active frontage facing onto The Broadway and acts as the eastern gateway to Wimbledon town centre.

The site is found within Wimbledon town centre. To the east the site adjoins mixed use developments including retail, offices and residential uses. The southern side of The Broadway opposite the site has a range of building heights, up to six storeys. The site is bounded on the east by Trinity Road. To the north of the site is the former Conservative Club (recently sold) and residential properties 2-3 storey semi-detached homes.

A planning application (ref: 20/P1738) was granted permission for a 121-room hostel, 135 apartments, gym, café and other ancillary uses.

Site owner: YMCA London South West

Site area: 0.21ha

Existing uses: YMCA with hostel space, gym, sports hall and café.

Site allocation: A suitable mix of retail, financial and professional services, restaurants /cafes, drinking establishments, offices, community use and residential (including hostel or hotel).

Site deliverability: 0-5 years	
Indicative site capacity: 135 new homes plus 121 bed hostel space (A planning application (ref: 20/P1738) was granted permission for a 121-room hostel, 135 apartments, gym, café and other ancillary uses.	
Design and accessibility guidance:	
Development proposals will need to consider the amenity of neighbouring residential uses to the north of the site.	
Any servicing facilities should be provided on site to minimise impacts on traffic movement, congestion and road safety. Mitigating and managing the impacts of parking on neighbourhood and local amenity will need to be addressed.	
Due to the site prominence (active frontage facing onto The Broadway and gateway to the town centre) redevelopment of must be of exemplary design.	
The site provides an opportunity to provide modern, well-designed hostel type accommodation and support services for vulnerable people in an accessible location.	
Public space would be welcomed as part of any development proposal.	
Development proposal must have regard to the design-led Future Wimbledon SPD (Supplementary Planning Document).	
Development proposals must ensure links and access to the nearby bus stops.	
The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.	
Infrastructure Requirements:	
Development proposals for this site must <u>refer to the have regard to Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</u>	
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.	
Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.	
The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and <u>in line with the height parameters set out in having regard to the Future Wimbledon SPD</u>
Impacts Listed Buildings or undesignated heritage assets.	No

Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
Impact from flooding from all sources.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impact on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a, excellent access to public transport.

Site Wi16: Centre Court Shopping Centre, The Broadway, Wimbledon SW19**Ward:** Hillside

Site description: Centre Court is a purpose-built shopping centre in Wimbledon town centre. The shopping centre runs along a major transport infrastructure - Wimbledon Station (underground, tram and railway services). The railway lines and platforms run along the western side of the shopping centre.

The main site entrance is found to the south west of the site along The Broadway. Secondary accesses are found along Queen's Road. The site is surrounded by several building types ranging in height from two to four storeys.

The east of the site is Queen's Road which provides access to nearby residential roads, to the shopping centre car park, a church and residential shelter home. Nearby residential roads are made up of a mixture of semi-detached two-three storey homes and detached homes.

On the corner of Queen's Road and The Broadway is made up of retail and financial services businesses with either office or homes on upper floors.

To the south of the site is the Broadway, the main road that runs through the centre of the town centre. The Broadway is a mixture of retail uses and mixed uses buildings typically retail at street level with either residential or offices on upper floors.

The main site entrance is found to the south west of the site along The Broadway. Secondary accesses are found along Queen's Road. The site is surrounded by several building types ranging in height from

two to four storeys.

The site includes two Grade II listed buildings (Old Town Hall facing The Broadway and the frontage of the Old Fire Station facing Queens Road) and falls within the Broadway Conservation Area.

Site owner: Romulus

Site area: 1.8ha (approx.)

Existing uses: a mixture of town centre uses – retail, restaurants, financial and professional services and ancillary offices.

Site allocation: A mixture of Itown Centre Itypes Uses such as community (including health and wellbeing /day centre), retail, restaurants and cafes take-away, financial and professional services, leisure, offices, hotel, residential and last mile distribution.

Site deliverability: 0-5 years (phase 1) 5-10 years (phase 2)

Design and accessibility guidance:

The site provides an excellent opportunity for the repurposing and redevelopment of a substantial brownfield site within the heart of the town centre.

The site provides an excellent opportunity to contribute towards a significant improvement to the public realm on Queens Road with priority for pedestrians and cyclists and less traffic dominated.

Development proposals must have regard to the design-led Future Wimbledon SPD (Supplementary Planning Document), the Broadway Conservation Area design guide and design considerations relating to the two Grade II listed buildings on site.

Development proposals must provide links and access to Wimbledon Station and nearby bus stops, which surround the site. They must also look to facilitate a potential road bridge linking Queen's Road and Alexandra Road to the rear of the site.

Development proposal must be sensitive, protect and enhance listed building on the site and improve their setting.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

Development proposals for this site must refer to the have regard to Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.

Enhance and expand existing public realm around the site, particularly at Queens Road and on part of The Broadway. Provide enhanced public cycle parking facilities, including a secure hub for commuters and make provision to accommodate cycle/ scooter hire schemes.

The site also provides opportunities to explore options to incorporate “last mile” sustainable consolidation delivery solutions serving the site as well as the wider town centre and area.

This site is in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer and Merton Council must engage with the Metropolitan Police Service (MPS) as part of any pre-application and planning application for this site, due to the proximity of the site to the Wimbledon Police Station.

The developer should contact SGN to discuss requirements for any improvements to the gas

infrastructure network.

The site is adjacent to rail tracks which are used by National Rail and District Line services and will also form part of Crossrail 2. The developer will have to consult and engage with Transport for London, Network Rail and Crossrail 2 as part of any emerging proposals on this site.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The developer must consult and engage with the Metropolitan Police Service (MPS) on any development proposals to prevent adverse impacts of future development affecting the MPS's operational facilities. The Council will also engage as seek advice from the MPS

The site location

Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the having regard to the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	Yes
Impacts a Conservation Area.	Yes.
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	Yes
In a Flood Zone.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	Yes
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport



CHAPTER 10. HEALTH AND WELLBEING

Strategic policy HW10.1 Health (including mental health) and Wellbeing.

We will continue to improve and promote a more active and healthier lifestyle of our residents, tackle the causes of ill health (physical and mental), and health inequalities in Merton. This will be achieved by:

- a. Working with strategic partners such as NHS (National Health Service) England, Clinical Commissioning Groups (CCG) and Merton's Health and Wellbeing Boards in **improving health and wellbeing**, tackling health inequalities, public health safety (for example during pandemics and other health emergencies), promoting and encouraging healthy lifestyles and creating healthy environments in Merton for all.
- b. Improving access to healthcare, voluntary organisations and community health facilities.
- c. Addressing and reducing the health inequalities in Merton as identified in Merton's Health and Wellbeing Strategy and the Joint Strategic Needs Assessment.
- d. Tackling Merton's childhood obesity as identified by Merton's Child Healthy Weight Action Plan especially in areas of deprivation.
- e. Working with Alzheimer's Society, Merton Dementia Action Alliance and other partners to make Merton a Dementia Friendly borough, helping all those living with dementia in the borough in line with the Mayor's ambition to make London a Dementia Friendly city.
- f. Ensuring that 20-minute neighbourhoods are planned and designed well in accordance with 20 Minutes approaches which, promote and enable healthier and active living, adopt active aging approaches and improve access to green infrastructure
- g. Improving air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.
- h. Improving the public realm in accordance with the **Transport for London (TfL) Healthy Streets Approach** and **Sport England Active Design principles 10 principles and guides** to provide an improved network of safe and convenient pedestrian and cycle routes that enable healthy and active travel choices, especially in areas identified as Air Quality Focus Areas in Merton's Air Quality Action Plan.
- i. Ensuring that our neighbourhoods are inclusive and accessible for all (**including disabled people¹**) and encourages social interaction.
- j. Taking an integrated approach through a number of policies in the local plan, for example infrastructure, green and blue infrastructure, air quality, climate change, transport and

¹ [Definition of disability under the Equality Act 2010](#)

design policies to improve health (including mental health) and wellbeing.

Justification

Coronavirus (COVID-19 pandemic)

- 10.1.1. The coronavirus (COVID-19) pandemic has been described as a watershed moment for inequalities. Covid-19 has put the national focus on inequalities, especially the link between health and income. It has deeply exposed known inequalities and will further no doubt compound them. The impact on mental health could lead to a longer-term erosion of people's physical health affecting people who have not previously experience poor mental health.
- 10.1.2. The way we use our homes has changed; more people are working from home. This has brought to light the importance of excellent quality and adaptable housing including personal, work and outdoor space.
- 10.1.3. During the pandemic visits to parks and public green spaces increased across London. The pandemic has exposed the benefit of access to green spaces and nature for physical activity and play, mental wellbeing and mental resilience. Several surveys carried out on people with lung condition found that around 20% reported improvement to their conditions. This is contributed to the short-term reductions in levels and exposure of air pollution (for example PM25 and NO2) during lockdown and social distancing measures.
- 10.1.4. The pandemic highlighted that behaviour change is possible. This behaviour change has been a direct and implemented by government and legislation. Behaviour change at a local level may not be able to be that direct but done in an integrated way we can create healthier and greener environments which will encourage and enable behaviour change such as walking and cycling.
- 10.1.5. The recovery after Covid-19 is a priority for Merton Council, not just the economic but also the health and wellbeing recovery. Our response to this health crisis will shape how we will deal with population health in the next decades. Covid-19 pandemic will offer lessons and opportunities leading to action.

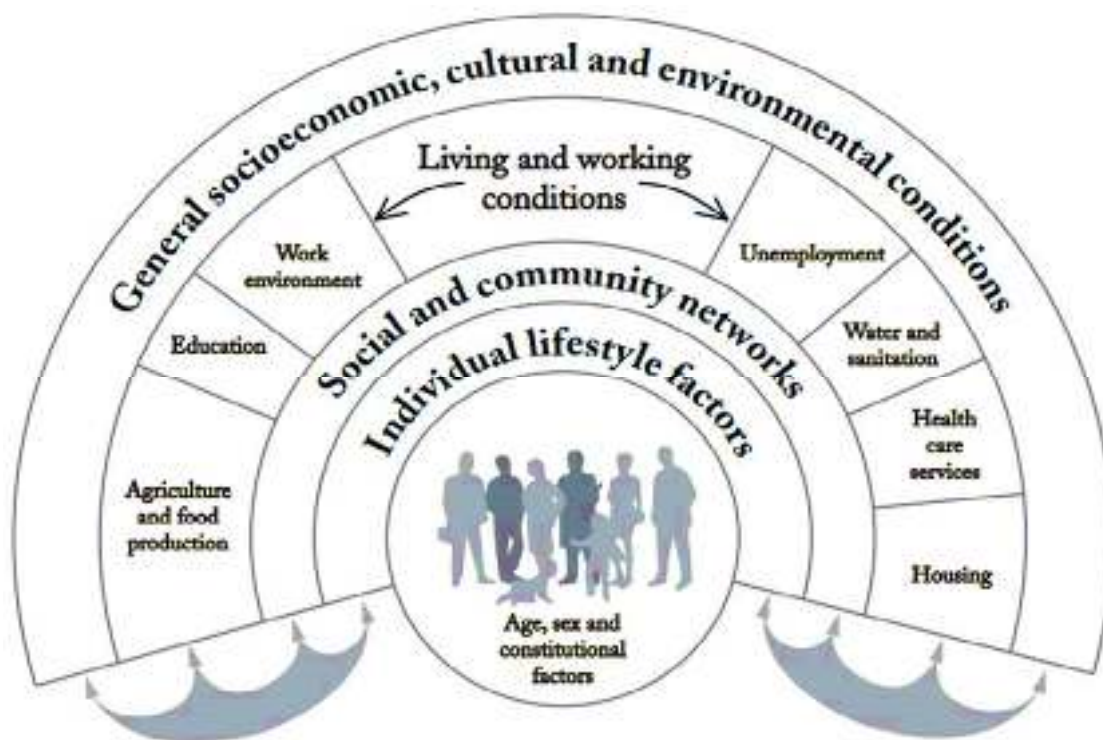
Wider determination of health

- 10.1.6. The creation of healthy environments for people of all ages in Merton will be a key consideration when the council determining planning applications. A healthy environment can promote and encourage healthy lifestyles by way of good design, green open spaces and opportunities to promote walking and cycling.

10.1.7. The Mayor’s Transport Strategy sets a target for the percentage of residents doing at least 20 minutes of active travel a day, which for Merton is 70% by 2041. Almost 60% of Merton adults are overweight and diabetes cases are increasing by about 2% per year. One in five children entering reception are currently overweight or obese, a figure which increases to one in three leaving primary school in Year 6.

10.1.8. Planning can play a pivotal role in influencing key health determinants, especially towards improving long-term outcomes and addressing health inequalities. Delivering health outcomes will be important for our recovery following the pandemic. The determinants of health shown in the diagram below include:

- Social and economic environment
- Physical environment.
- individual characteristics and behaviours



Determinants of health and wellbeing in our neighbourhoods (Barton and Grant, based on Dahlgren and Whitehead).

10.1.9. The World Health Organisation defines health as ‘a state of social, physical and mental wellbeing and not merely the absence of disease. We understand that it is possible to make the health and wellbeing outcomes of an area better and recognise that planning has a vital role to play. We will ensure that development proposals in Merton help to promote active travel choices, physical activity and active aging, enhancing the feeling of safety and

security, creation of permeable attractive street frontages and creating spaces where people can come together to relax and socialise.

- 10.1.10.** The recent released Royal Town Planning Institute (RTPI) report, Enabling Healthy Placemaking, called for a greater level of cooperation and collaboration between health, social care and planning professionals to ensure people's health needs are integrated into the conceptualisation, design and planning stages of new development in the future.
- 10.1.11.** Following a call for evidence [from](#) the Royal Town Planning Institute (RTPI) in September 2019, this research explores local, national and international planning practices enabling the creation and delivery of healthy places. The report highlighted cooperation between public health, social care and the planning profession is essential. Innovative partnerships, communication and adequate resourcing often underpin effective models of cooperation, which in turn leads to successful project implementation.

Health and climate change

- 10.1.12.** Climate change is also a public health emergency – climate change impacts health directly through extreme weather condition such as floods and heatwaves, indirectly through disruption to natural systems (changing patterns of disease), social systems (forced migration) and the interaction between the two systems. In the UK, the effects of climate change will not be felt equally and are likely to increase health inequalities. However, there are significant health opportunities in the response to climate change. Many of the solutions to address climate change, such as promoting more active travel (walking, cycling and other sustainable travel modes) and healthy sustainable diets (good eating habit/growing our own food) are inventions that also brings benefits to health.

20 Minute neighbourhoods – health and wellbeing benefits

- 10.1.13.** Planning Practice Guidance (PPG) highlights the importance of promoting access for the whole community. The National Planning Policy Framework (NPPF) recommends that local authorities should consider opportunities [to support for](#) people to live healthy lifestyles including planning for an environment that helps promote active travel and physical activity. Good quality infrastructure encourages walking, cycling and the use of public transport, which makes it easier for people to choose more active travel, which supports individual health choices, and helps prevent weight related illnesses, including diabetes and cardiovascular disease.
- 10.1.14.** There is widespread recognition that the places where people live are major influences on their wellbeing. There are economic, environmental, health and social benefits of 20-minute neighbourhoods. The Town Country Planning Association (TCPA) has produced [‘20 Minutes Neighbourhood, Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England’](#) a guide in creating and transforming areas into

these neighbourhoods.

10.1.15. The 20-minute neighbourhood is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day – shopping, school, community and healthcare facilities, places of work, green spaces and more.

10.1.16. Every community has its own context and aspirations for the future. Any plans to create a 20-minute neighbourhood will be based on what the local diverse community (including children and young people, ethnic minorities and disabled people) wants. However, the following characteristics, or ‘ingredients’, are likely to be part of the mix:

- Diverse and affordable homes
- Well-connected paths, streets and spaces
- Schools at the heart of communities
- Good green spaces in the right places
- Local food growing
- Keeping jobs and money local
- Community health and wellbeing facilities
- A place for all.



Town and Country Planning Association (TCPA) 20 Minutes Neighbourhood features

Active Design 10 principles and guides

10.1.17. [Active Design](#) principles support National Planning Policy Framework (NPPF). Many Active Design principles are already embedded within overlapping disciplines related to open

space and landscape, transport, access and design.

- 10.1.18.** Embedding Active Design principles into the design and layout of a development at an early stage will meet a number of planning, transport and health objectives in an integrated and co-ordinated manner. This can assist in providing a smoother and quicker route through the planning application process and can help build support from neighbours and local communities for proposals resulting in more positive outcomes for applications. Our local plan design policies have embedded Active Design and other recognised design principles.

Healthy Streets Approach

- 10.1.19.** The aim of [Transport for London Healthy Streets Approach](#) is to help create a vibrant, successful city where people can live active, healthy lives. The Healthy Streets Approach seeks to make our neighbourhoods a healthier, more sustainable, safer and more connected. The easiest way for most of us to stay active is by walking or cycling as part of our daily travel. Several policies in the Local Plan seek to deliver and have incorporated the Healthy Streets Approach such as, the transport, design and green infrastructure. Our local plan has embedded Health Street Approach throughout.



Transport for London: Healthy Streets Approach indicators

Health and improving air quality.

- 10.1.20.** The government's [Clean Air Strategy \(2019\)](#) highlights that active travel such as, cycling

and walking creates less pollution. It says that there are well understood health co-benefits from active travel including greater fitness and improved mental health, as well as lower risk of obesity, heart disease and lung disease. In addition, active travel reduces traffic congestion, itself a major cause of air pollution. The Mayor of London's Health Inequalities Strategy states that the Mayor wants London to be a place where our surroundings the places we live, work and play supports good health. The Mayor's key ambition is for London to have the best air quality of any major global city.

10.1.21. [Merton's Air Quality Action Plan \(AQAP\)](#) has been produced as part of our duty under the London Local Air Quality Management statutory process and outlines the action we will take to improve air quality in the London Borough of Merton between 2018 and 2023, for example:

- To provide guidance to developers on the impact of development on air quality and ensure that approved schemes include effective mitigation and maximise the opportunity to improve infrastructure for sustainable transport options.
- To continue to work with schools, parents and students to improve awareness of air quality and to optimise parents' and children's desire and opportunity to adopt sustainable travel options.

10.1.22. The local plan seeks, to, reduce the impacts of poor air quality in an integrated way, through a number of policies including P15.10 *Improving Air Quality and Minimising Pollution* which seeks to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.

Dementia Friendly Merton

10.1.23. Since the G8 dementia summit, 'Global action against dementia' in 2013, there has been a national movement toward developing dementia friendly environment. Over the years there have been several pilot projects across the UK (United Kingdom) with the aim to make towns and cities more accessible and understandable to enable people with dementia to live more independently for longer.

10.1.24. According to Merton's Strategic Housing Needs Assessment 2019 and based on population projections the GLA (Greater London Authority) Population and Household Projections (2016), by 2030 2035 the number of people aged over 75 85 is predicted to increase by 41% 52% in Merton. With more people, living longer there is also an increase in older people living alone and people living at home with long-term physical and mental conditions such as dementia. There are an estimated 72,000 people living with dementia in London (850,000 people in the UK). If current trends continue, there will be a 40% to increase in the people living with this condition by 2025. It is estimated that circa 2,000 people are living with dementia in Merton.

- 10.1.25.** Merton Council is an active member of [Merton's Dementia Action Alliance \(MDAA\)](#). The DAA partners includes shops and other businesses, banks, Public Health professionals, the London Fire Brigade, Metropolitan Police Service (MPS) and the leisure industry. Merton Council has been recognised for the work we are doing in our aim to be a dementia friendly borough and has been awarded the status of 'Working towards Dementia Friendly' status by the Alzheimer's Society and is fully committed to creating. Dementia Friendly communities.
- 10.1.26.** A Dementia Friendly borough will consider transport, housing, health services, culture, and social integration through the lens of dementia, with the aim that all those living with dementia in Merton should be empowered and supported to live well. It is recognised that well designed local environments can positively have a substantial impact on the quality of life and on health and wellbeing. Well designed and well-planned environments and buildings can also help also someone living with dementia live well for longer. More importantly incorporating dementia friendly approaches into development proposals does not just help people living with dementia but is also beneficial to Merton's growing ageing population, people with disabilities and families with small children.
- 10.1.27.** Dementia friendly design approaches take existing design best practices and either adapt or strengthens them with a focus on the needs of people living with dementia. These approaches aim to create inclusive environments/neighbourhoods and will help reduce stigma and supported people living with dementia, ~~other health conditions such as~~ **and many other impairments including people with physical and sensory impairments, neurodiverse people (including autism), people with learning disabilities and mental health service users.** Inclusive neighbourhoods go beyond providing physical access and creates solutions that work better for everyone; ensuring that everyone can equally, **and** confidently ~~and independently~~ use buildings, transport and public spaces. An inclusive environment is one which can be used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people.
- 10.1.28.** There are several practical guides that provide to help developer incorporate dementia friendly approaches. We recommend that developers have consideration to The Royal Town Planning Institute (RTPI) practice guide '[Creating better environments for people living with dementia](#)' This guidance provides practical advice on how to incorporate dementia approaches in development proposals. The guidance also provides case studies of development schemes and how developers worked with the Alzheimer Society, Help the aged and other organisations.
- 10.1.29.** Another useful tool for developers is '[The Place Standard](#)' toolkit. This tool was developed by the Scottish Government, NHS (National Health Service) Health Scotland, Architecture and Design Scotland. It is used by many local authorities as a framework for consultation on development, however it can be used by developers to assets proposals.

- 10.1.30.** Halsall Lloyd Partnership architects and designers have produced two guides promoting action research into design for dementia, working in partnership with Liverpool John Moores University, the Building Research Establishment (BRE) and other partners. [Volume 1: Design for Dementia](#), a guide with helpful guidance in the design of exterior and interior environments. [Volume 2: Design for Dementia, Research Projects](#), outlines the research projects and describes the participating approach.
- 10.1.31.** We recommend that developers consider the above and other guidance produced by the architectural, urban design and health organisations that provide guidance on creating dementia friendly homes and environments. We would also recommend that developers seek advice from Alzheimer’s Society and Merton’s Dementia Hub on incorporating dementia approaches in their development proposals at an early stage.

Policy HW10.2: Delivering healthy places.

We require development proposals to improve and promote strong, vibrant and healthy communities.

- a. We will require development proposals to:
- i Contribute towards the health priorities of Merton Health and Wellbeing Board and partners to help reduce inequalities including health, across Merton.
 - ii Incorporate the Transport for London (TfL) Healthy Streets Approach as part of development proposals in accordance with the design, housing, environment, economy and other policies in this plan that address the wider determinants of health and improve quality of life.
 - iii Encourage opportunities for food growing such as allotments, community gardens and other innovative food growing spaces as part of development proposals.
 - iv Incorporate Sport England and Public Health Active Design principles as part of development proposals.
- b. We will:
- i Use the Healthy Streets Approach to priorities health and wellbeing in planning decisions.
 - ii Require all developments in Merton of 100+ residential units or over 10,000m² non-residential development to carry out a Health Impact Assessment (HIA).
 - iii Require a HIA for developments of over 50 homes in areas identified by the Ministry of Housing, Communities and Local Government (MHCLG) Indices of Deprivation or identified in Merton's Joint Strategic Needs Assessment (JSNA) as an area of health priorities.
 - iv Require a HIA for the following developments:
 - Cumulative impact - proposed development is in an area with two or more other major developments planned or started.
 - Significant developments in areas of poor air quality, for example Air Quality Focus Areas
 - If 1 or more hot foods takeaways are proposed.
 - New educational, health facilities or publicly accessible open space are proposed.
 - v In line with the policy in this plan to manage and monitor proposals for new hot food takeaways found within 400 metres of the boundaries of a primary or secondary school to promote the availability of healthy foods. Where any development proposals involving hot food takeaways are permitted, the Council will require the operator to achieve and operate in compliance with, the Healthier Catering Commitment standard.

Justification

10.2.1. Merton is considered a healthy borough when compared to other London boroughs regarding health and wellbeing. However as identified in [Merton's Health and Wellbeing Strategy](#), a different picture emerges especially when it comes to health inequalities. The west of the borough (Wimbledon and Raynes Park neighbourhoods) in general tends to be healthier, more physically active, have higher levels of educational achievement and earn more money. Other neighbourhoods (Mitcham, Colliers Wood and Morden neighbourhoods) have higher levels of health inequalities, less physically activity, have lower educational achievement and tend to earn less money. There is evidence that creating healthy environments could create economically thriving spaces that would add value to development proposals for example:

- Increase trade by 40% when places are made more attractive for walking.
- Commercially: 80% retail sales when places are easier and more attractive to walk around

Hot food takeaways

10.2.2. According to [Joint Strategic Needs Assessment \(JSNA\): The Merton Story](#) produced by Public Health Merton and Public Health England the percentage of Year 6 (aged 11) children in Merton identified as obese is 21%; this figure is higher than the national average (19%). Access to fast food takeaways may influence the ability of our children to adopt healthy lifestyles and may potentially undermine healthy eating initiatives which are place in several schools in Merton.

10.2.3. We will look to create and promote healthy food environment in Merton by increasing the availability of healthy food and limiting unhealthy options. As such, and in line with line with Policy DM TC 7.11, when considering new development proposals for fast food takeaways located 400 metres from the exit and entrance of an existing or proposed school the council will have regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of hot food takeaway outlets and healthy eating initiatives taking place at the school.

10.2.4. We fully support the Mayor of London Healthier Catering Commitment (HCC) and with Merton Public Health will working with businesses (including new businesses) that serve and/or sell food to help improve their food offer. We will encourage all new food establishments in Merton to sign up to the HCC.

Health Impact Assessments (HIA)

- 10.2.5.** We recommend that a Health Impact Assessment (HIA) is carried out at an early stage of a development proposal. HIAs are designed to consider whether a development proposal might reinforce health inequalities and inadvertently damage people's health or have positive health outcomes for the local community. Ensuring issues are considered at an early stage in developing planning proposals can help improve both the physical and mental health of the population. Carrying out a HIA during the implementation stage is technically possible but it brings a risk of retrofitting health sensitive solutions to the proposal and is likely to generating more development costs, which could adversely affect financial viability of the development.
- 10.2.6.** HIAs promote sustainable developments that support the creation of strong, vibrant and healthy communities by:
- Considering both the positive and negative health impacts when preparing development proposals and should identify actions to enhance the positive impacts and mitigate the negative impacts. The outcome of these actions should be clearly identifiable within the planning application.
 - Identifying the actions needed to minimise any negative impacts on health and wellbeing of a particular development scheme.
 - Demonstrating that developers have worked closely with communities directly affected by their proposals to evolve designs that take account of the views of the community.
 - Considering the cumulative impact of development, i.e., where several developments are in progress within the local area, especially where this relates to construction, as well as the potential overconcentration of uses in a local area. The combination of several large residential schemes may also have a material impact on access to services and amenities.
- 10.2.7.** We will require the HIA to prove how it has informed the development proposal, any later changes made to the proposal and how Merton's health and wellbeing priorities have informed the proposal. It is recommended that before carrying out a HIA that developers seek advice from the council.



11. HOUSING PROVISION

Strategic Policy No. H11.1

Housing choice

To ensure that Merton's existing and future residents have a choice of different types, sizes and costs of homes.

We will:

- a. Require proposals for new homes including new build schemes and redevelopment proposals to be well designed and located to create socially mixed, inclusive and sustainable neighbourhoods.
- b. Seek the provision of a mix of housing types sizes and tenures at a local level to meet the needs of all sectors of the community and at all stages of people's lives. This includes the provision of family sized and smaller homes and provision for those unable to compete financially in the housing market sector and those with special needs.
- c. Incorporate the re-provision of at least one family sized home where the loss of an existing family sized home is proposed.
- d. Provide step-free accessible and adapted housing in accordance with London Plan Policy D7 (Accessible housing) ~~and~~ Building Regulation Requirement M4(2) and M(4.3) and this Local Plan's policy D12.3 Ensuring high quality designs in all developments, 90% of all new build housing is required to be 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings.
- e. Aim for the strategic target of 50% of new homes built in Merton between 2022/~~23~~-2036/~~37~~ to be affordable.
- 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>¹Threshold 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:</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

- g. Demonstrate that they have taken account of the strategic 50% target and have sought grant where required to increase the level of affordable housing beyond 35%.
- h. Applicants should present data for all housing tenures proposed in their scheme as a percentage of total residential provision in three ways: as the number of homes (units), habitable rooms, and floorspace.
- i. For schemes of 10 homes and above, affordable housing is required to be provided on-site. In exceptional circumstances, where the applicant has robustly demonstrated to the council that on-site provision is not feasible, we may consider a financial contribution equivalent. This justification must include the provision of a detailed financial appraisal. For these schemes, off-site and cash in lieu schemes must accord with the requirements set out in The London Plan and [have regard to](#) the Mayor’s Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these.

- j. All affordable housing provided by the scheme must be affordable in perpetuity and secured via planning obligation (Section 106 agreement or appropriate legal deed).

Justification

Access to decent homes

- 11.1.1.** National and regional guidance acknowledged that being able to access decent affordable accommodation is a major factor in improving health and wellbeing (including mental health). Accommodation standards and affordability have a strong influence on other issues which contribute to quality of life, including health (including mental health) and wellbeing, crime, education and skills. Merton's Strategic Housing Needs assessment (SHNA) (July 2019), identified a notable and pressing need for affordable homes.
- 11.1.2.** There are marked differences in quality of life between different communities within Merton. The wards in the east of the borough (Abbey, Colliers Wood, Cricket Green, Figges Marsh, Lavender Fields, Pollards Hill and St Helier wards) have long-standing issues of multiple of deprivation and income deprivation, when compared to the wards in the more affluent west of the borough. There are some pockets of deprivation in the west. The Covid-19 pandemic, has not only highlighted these issues but, has widened the gap between the west and east of the borough.
- 11.1.3.** Merton is one of the most diverse boroughs in terms of house prices as it has both more affluent neighbourhoods in the west of the borough (e.g. Wimbledon) and respectively more affordable east of the borough (e.g. Mitcham). Merton's median housing value reached £460,000. This is above both the national (£222,000) and the regional (£450,000) equivalents. It is also higher than the Outer London equivalent of £397,500. Over the last 5, 10 and 15 years Merton's house prices have grown quicker than England and the Outer London Region.

Affordable housing tenure

- 11.1.4.** **Low cost rented tenure** consists of Social Rented homes and London Affordable Rent. **Intermediate tenure** includes Intermediate Rent and Affordable Home Ownership products such as London Living Rent. All affordable tenures are as defined in the London Plan or any subsequent updates to it. We are committed to ensuring delivery of genuinely affordable housing and rents for both Social Rent homes and London Affordable Rent that are significantly less than 80% of market rents, which is the maximum for Affordable rent permitted by the NPPF (National Planning Policy Framework).
- 11.1.5.** We expect the low cost rented tenure requirement of policy H4.1 to be delivered primarily as social rented housing to better address the overwhelming housing need in

Merton. We support affordable housing which genuinely addresses those in housing need in Merton – that is at household income levels below £38,400, or concerning low cost/intermediate rent and affordable homeownership that meet the rent levels and prices set out in figs 4.1.1, 4.1.2 and 4.1.3 or subsequent updates to these.

Low cost and intermediate rent levels

- 11.1.6. [Merton’s Strategic Housing Needs Assessment \(SHNA\) \(2019\)](#) identified that any household with an income below £38,400 would not be able to afford a lower quartile rent without some degree of subsidy. It also identified a need for around 878-1,084 homes per annum – this is for subsidised housing at a cost below that to access the private rented sector (i.e. for households unable to access any form of market housing without some form of subsidy and at a household income below £38,400).
- 11.1.7. Merton’s SHNA analysis sets out appropriate affordable rent (termed as living rents in the SHNA) for different sizes of accommodation in different locations based on local incomes and housing costs in Merton. The analysis shows rents starting at about £400 for a 1-bedroom home (in Mitcham) and rising to over £800 for homes with 3-bedrooms. None of these figures have been capped by Local Housing Allowance (LHA) as the maximum LHA is higher than the affordable rent levels for all sizes and locations in Merton. Rents above LHA should be avoided to ensure housing is affordable to those needing to claim Housing Benefit.

	1-bedroom	2-bedroom	3-bedrooms
Mitcham	£401	£522	£642
Morden	£422	£548	£675
Raynes Park	£467	£607	£747
SW/CW	£474	£616	£758
Wimbledon	£514	£669	£823
Total	£449	£583	£718

Source: ASHE and Living Rents methodology

Figure 11.1.1 Living rents (per month)

- 11.1.8. For the purposes of testing potential levels of affordable housing to inform Merton’s Local Plan, [Merton’s Local Plan Viability Study \(2020\)](#) assumed affordable rents that do not exceed London Affordable rents as shown in Fig 4.1.2. These rents are broadly equivalent to social/ target rents. In the study London Living Rent tenure was based on the lower end GLA benchmark rents for Merton for that tenure. For schemes proposing London Living Rent we will have regard to these benchmark rents.

Rent type	1 bed	2 bed	3 bed	4 bed
London Affordable Rent (2020/21)	£159.32	£168.67	£178.05	£187.05
London Living Rent (intermediate tenure) ¹⁶	£182.51	£202.79	£223.07	£243.35

Figure 11.1.2 Affordable housing rents (per week)

Affordable home ownership

- 11.1.9.** We seek 10% of all housing on sites of 10 homes and above to be affordable home ownership (as set out in the NPPF). ~~However, given that the main analysis of affordable need also showed a notable level of need, involving households who cannot afford anything in the market without subsidy, there is no basis to increase the provision of affordable home ownership above the 10% figure. As exceeding this figure would impact the delivery of affordable housing of those in a more acute need.~~
- 11.1.10.** We will expect affordable home ownership to meet local incomes and local housing costs. Merton’s SHNA recommends that prices should be set at a level which (in income terms) are equivalent to the levels needed to access private rented housing in Merton.
- 11.1.11.** Figure 4.1.3 from Merton’s SHNA analysis, sets out a suggested purchase price for affordable home ownership in the borough. The figures are based on trying to roughly equate a sale price with an equivalent access point to the private rental market. This shows across the Borough a one-bedroom ‘affordable’ price of about £149,000 rising to almost £300,000 for homes with four or more bedrooms.

	1-bedroom	2-bedroom	3-bedroom	4+-bedroom
Mitcham	£129,000	£162,000	£195,000	£229,000
Morden	£129,000	£165,000	£195,000	£229,000
Raynes Park	£160,000	£178,000	£227,000	£330,000
SW/CW	£149,000	£184,000	£233,000	£280,000
Wimbledon	£170,000	£204,700	£263,000	£413,000
Borough-wide	£149,000	£184,900	£220,000	£299,000

Source: Derived from Valuation Office Agency data

Figure 4.1.3 Affordable housing home ownership prices (aligned with the cost of accessing private rented sector) – data for the year to March 2018)

- 11.1.12.** Merton’s SHNA recommends that given the high level of need shown, based on households unable to buy or rent in the market the council should consider London Living Rents (which can provide a route into home ownership) ahead of shared ownership as a preferred form of intermediate housing. Merton’s SHNA also recommends that if, for viability purposes shared ownership is included this should not make up more than 10% of homes on any individual site. Whilst London Shared Ownership is classes as an affordable tenure (in line with both the London Plan and the NPPF) it is likely to be the tenure that is available to the fewest number of households with a need due to having higher housing costs.
- 11.1.13.** We will have regard to the purchase prices for affordable home ownership, intermediate and low-cost rent levels set out in Merton’s SHNA, and subsequent updates to this information, in its assessment of submitted schemes aimed at achieving provision of genuinely affordable homes that more appropriately addresses affordable housing needs in Merton.

First Homes

- 11.1.14.** First Homes are a form of discounted market sales housing and to be considered as such must meet the requirements set out in the MHCLG Ministerial Statement published on 24th May 2021 [Written statements - Written questions, answers and statements - UK Parliament](#) and the definition and eligibility requirements set out in NPPG Guidance [First Homes - GOV.UK \(www.gov.uk\)](#). First Homes are the government’s preferred discounted market tenure and are required to account for at least 25% of all affordable housing homes delivered by developers through planning obligations. First Homes are an intermediate tenure therefore in accordance with government requirements, proposals for new homes will be considered against the intermediate tenure split element of Policy H11.1(Housing Choice).

Delivery of affordable homes

- 11.1.15.** Merton is a borough of small sites. On average over the last 12 years more than 90% of the planning applications for new homes submitted to Merton Council were for sites of less than 10 homes. As the London Plan and Merton's previous policy only applied to developments of 10 homes or more, this means that very few developments were eligible to provide affordable housing through the planning system.
- 11.1.16.** For example, Merton's Annual Monitor Report 2018/19 indicates that in 2018-19 only one development was built in Merton that was greater than 10 homes, and this development was for 11 homes. From this one development five affordable homes were built which totalled a 45% contribution towards affordable housing from the site, above the borough's 40% target. The delivery of affordable housing has been affected by the introduction of Prior Approval rights to convert office, retail and storage premises to residential use without the need for full planning permission. This is particularly evident in the financial years 2015/2016 and 2016/2017 where 47% and 36% of the total number of homes built in those years was via prior approval.
- 11.1.17.** Merton is experiencing an increasing number of schemes proposing 100% intermediate housing, as the affordable housing proportion of the scheme, which is contrary to Merton's policy requirement. The reasons provided by proposers is that this is what can be viably delivered and that there is a lack of interest from Registered Providers in managing low cost rented homes in preference to shared ownership homes which they consider a more attractive product. This is evidenced by the fact that Registered Providers in Merton are willing to purchase additional shared ownership homes than what the GLA can offer grant for. However, this situation poses a deliverability mismatch as there is overwhelming needs in Merton for low-cost affordable housing. This illustrates a tension that exists between viability and addressing housing needs.
- 11.1.18.** Merton's SHNA supports the introduction of a 70 / 30 split between low cost rented and intermediate which better benefits people most in need and reflects the unmet affordable housing need to be addressed. This tension is acknowledged in the London Plan which states at paragraph 4.6.1: the 2017 SHMA [Strategic Housing Market Assessment] shows London's significant need for low-cost rental housing, however, the current national funding programme reflected in the Mayor's current Affordable Homes Programme (2016-2021) is focused on intermediate products which limits the Mayor's ability to require higher levels of low-cost rented accommodation. It is however noted that the Mayor's new Affordable Homes Programme (2021-2026) which runs concurrently to the current one, makes funding available for social rent products which should help alleviate this issue.

Financial contributions in lieu of affordable housing provision

- 11.1.19.** Off-site provision or in lieu financial contributions secured via legal agreements should provide no financial benefit to the applicant relative to on-site provision and review mechanisms will be included in accordance with the Viability Test Route (VTR) as set out in paragraph 4.4.13 of the London Plan and / or via any guidance provided on Merton's website or subsequent updates to these. Provision of affordable housing on all small sites of 2-9 homes (gross), will be as a financial in lieu payment. For schemes proposing 10 or more homes (gross), viability alone is insufficient justification for off-site affordable housing provision or a cash in lieu payment. Only in exceptional circumstances for schemes proposing 10 or more homes (gross) will the provision of affordable housing off-site or as a financial contribution in lieu of provision on site be considered subject to demonstrating to our satisfaction that this exception is justified.
- 11.1.20.** All schemes which propose off-site affordable housing or cash in lieu payments are required to provide a detailed viability assessment as part of the justification that these proposals are acceptable, in accordance with London Plan and Merton's Local Plan policies.
- 11.1.21.** The value of the in lieu payment should be based on the relevant threshold as a percentage of on-site homes. The payment in lieu should be calculated through two appraisals – one with the level of affordable housing required by policy and the other with 100% market housing: The payment in lieu will equate to the difference between the two residual values. Applicants should use the methodology set out in para.
- 11.1.22.** Affordable housing monetary contributions in lieu of on-site provision will be calculated on a case-by-case basis according to the following formula:

$$\mathbf{A-B=C}$$

Where:

A= value of the proposed development assuming 100% of the residential homes are provided as private housing.

B= the value that would otherwise have been achieved by the proposed development incorporating affordable housing in accordance with the affordable housing policy requirement.

C= payment in lieu.

11.1.23. We hold cash in lieu in a separate affordable housing ringfenced pot to enable resources to be pooled to provide greater or more appropriate new affordable housing provision to be made off-site, either on an identified site or as part of an agreed programme in compliance with the statutory tests for use of planning obligations. The information on off-site and cash in lieu delivery is monitored and published as part of Merton's annual Infrastructure Funding Statement.

Dwelling conversions

- 11.1.24.** Merton's Authority Monitoring Report 2018/19 indicates that in the past five years the number of conversion schemes of family homes to smaller sized homes has increased. The supply of one and two bedroom homes significantly exceed the number of three or more bedrooms. In 2018/9, 11% of new housing consisted of studios, 33% one bedroom, 33% were two bedrooms and only 20% were three or more bedrooms. On this basis it is evident that the anticipated number of three-bedroom homes has not been achieved whilst the number of one and two bedroom homes were significantly exceeded.
- 11.1.25.** The conversion of existing single dwellings into two or more smaller homes typically involves the intensification of Merton's suburban housing stock, resulting in the loss of larger homes. Given the identified need for three-bedroom homes and the historical provision of smaller homes, we are seeking to retain the existing stock of family sized homes in Merton. Applications for conversion of existing family sized dwellings into two or more smaller homes must include the re-provision of at least one family sized unit. A family sized unit is defined as having three or more bedrooms.
- 11.1.26.** It is considered that the requirement for proposals involving the loss of a family home to include the re-provision of a new family home strikes a suitable balance between increasing housing density in appropriate areas, but not at the expense of a net loss in much needed existing family sized housing or achieving well-designed development that provides acceptable living conditions.
- 11.1.27.** Some single properties within the borough are too small to convert, as it is not physically possible to provide two or more homes with rooms of an adequate size, or with sufficient internal circulation space. To ensure that dwelling conversions produce residential homes of a high quality, all new dwellings including dwelling conversions must comply with the most appropriate minimum space standards.

Projected population

- 11.1.28.** We encourage the provision of a range of housing tenures, sizes and types to meet the needs of Merton's communities at all stages of life. Merton's SHNA indicates for the period 2017- 2035, the largest growth will be people aged 65 and over.
- 11.1.29.** In 2035 it is projected that the number of residents aged over 65 across Merton is projected to increase by a minimum of 46%. The population aged 85 and over is projected to increase by an even greater proportion, 52%. The London Plan 2021 suggests an annual need for 105 homes in Merton that are specifically designed for the needs of older people (sheltered and Extra-care housing). Local research supports

the view that the need set out in the London Plan 2021 for older person homes is appropriate for Merton.

11.1.30. Looking at the earlier stages of life, Merton’s SHNA shows that there is projected to be little change in the number of people aged under 15, compared with increases or decreases shown for other age groups. Focussing on the population aged 18-23 (student-age) the analysis below shows that there is projected to be some modest rise in the age group. In total it is projected that the number of people aged 18-23 will increase from 11,300 in 2017 up to 12,800 by 2035, an increase for around 1,500, or 13%.

Maximising affordable housing provision

11.1.31. New homes built under “prior approval” (i.e. without the need for planning permission) are exempt from affordable housing requirements and this further increases these challenging circumstances. Merton is also a borough of small sites due to historically fragmented land ownership. Over the last 10 years to 2017, over 90% of the planning applications Merton has received to build new homes, have been for sites of less than 10 homes, as the table below indicates (please note that the figures in the table below exclude prior approval applications).

2007-2017	Number of Schemes	%	Number of homes proposed.	%	Net gain	%
1-10 homes	1,101	94%	2,388	38%	1,551	30%
11+ homes	71	6%	3,887	62%	3621	70%
Total	1172	100%	6275	100%	5172	100%

11.1.32. Therefore, in order to optimise every possibility for providing new affordable homes taking into account the specific circumstances of Merton, it is considered essential to continue to maximise affordable housing provision opportunities, including from small sites, subject to viability.

11.1.33. We will pursue requirements from small sites as financial contributions, as in practice it is our experience that this is what can be delivered. Feedback from affordable housing providers and developers demonstrates that it is difficult to find affordable housing

registered providers, willing to take small affordable housing schemes due to the additional costs of managing such sites.

- 11.1.34.** All affordable housing provided within the borough will be subject to nomination agreements with Merton's Partner Register Providers to ensure that they are occupied by persons nominated by the council. Agreements (currently s106 Agreements) used to secure affordable housing homes should include provisions for those homes to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable provision.

Measuring affordable housing

- 11.1.35.** Assessment of affordable housing proposals against our planning policy requirements will be measured as habitable rooms as defined by the London Plan. Habitable rooms in affordable and market elements of such schemes should be of a comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using habitable floorspace as defined by the London Plan. Applicants should present affordable housing figures and all other housing types and tenures proposed as a percentage of total residential provision in habitable rooms, units and floorspace (both gross [GIA (Gross Internal Area)] and net internal area [NIA]) to enable comparison.

Fast track route

- 11.1.36.** Planning applications that meet or exceed the relevant threshold level of affordable housing as set out in Local Plan policy H4.1, on site within their development as affordable housing without government grants will not be required to submit a viability appraisal. This is known as the fast-track route.
- 11.1.37.** In seeking affordable housing provision, we will have regard to site characteristics such as site size, site suitability and economics of provision such as financial viability issues and other planning contributions.
- 11.1.38.** In Merton's experience introduction of the Mayor's 'fast track route' has resulted in an unchanged position concerning the number of schemes submitted with viability appraisals. we will expect public subsidy / grant to be sought to increase the provision of affordable housing above the stated minimum threshold requirements of policy H11.1 (housing choice).
- 11.1.39.** Estate regeneration that involves the loss and replacement of affordable housing should deliver an uplift in affordable housing wherever possible. Therefore, all such

estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.

Strategic Policy No. H11.2

Housing Provision

We will aim to deliver a minimum of ~~11,732~~ **11,374** additional homes for the period 2022/23 - 2036/37 ~~2021/22 – 2035/36~~. This will be achieved by:

- a. Working with housing providers to optimise housing.
- b. Supporting the provision of well-designed new homes that create socially mixed and sustainable neighbourhoods.
- c. Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 and having regard to Merton's design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.
- d. Supporting the delivery of the small sites target of 261 new homes per year.
- e. Supporting the redevelopment of poor quality existing housing and proposals to improve the quality of existing homes that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of housing to temporary sleeping accommodation on a permanent basis.
- f. Support proposals for custom, self-build and community-led housing which optimise the use of land and meet all relevant policy requirements, such as those for affordable housing.

Justification

- 11.2.1.** We will encourage housing in sustainable brownfield locations. The ~~41,732~~ 11,374 additional homes for the period ~~2021/22 – 2035/36~~ 2022/23 – 2036/37 will come forward in Merton by:
- Bringing forward housing capacity through regeneration, including Morden town centre and the Merton Opportunity Area.
 - Prioritising the development of previously developed land and ensuring it is used efficiently.
 - Development of sites identified in Merton's Housing Trajectory.
 - Development of windfall sites.
 - Intensification of housing as part of estate regeneration proposals.
 - Enabling mixed use development within the town centres.
 - Bringing vacant properties back into use through Merton's empty homes strategy.
 - Resisting the loss of housing to other uses.
 - Preparing masterplans, development briefs and design guidance for larger housing sites.
 - Demonstrating a continuous delivery of housing for at least 15 years as the Housing Trajectory sets out below.
 - Setting out a 5-year supply of identified sites as shown in the Authority Monitoring Report.
 - Monitoring housing provision levels through the Housing Trajectory within the Authority Monitoring Report.
- 11.2.2.** Merton is a pro-growth borough and has substantial experience in delivering small sites over a long timeframe and throughout different economic and political cycles. Every year, between 85%-95% of Merton's planning applications for new homes are for small sites (sites of 10 homes or less). However, as each small site delivers fewer than 10 homes, small sites contribute about 50% of the overall number of homes built each year in Merton, with large sites (which make up usually less than 10% of the planning applications received) contributing the other 50% of homes built.
- 11.2.3.** Merton's housing target, which is set out in the London Plan 2021, is 9,180 homes for the ten-year period 2019/20 to 2028/29 or 918 homes per annum. This is based on a detailed analysis of land availability and capacity across London that Merton worked with the GLA and all other London boroughs. The London Plan expects 261 homes of the 918 homes per annum to come forward on small sites. All housing development proposals will be required to meet the requirements of all relevant local plan policies including those contained in the following chapters: *Climate Change; Places and Spaces in a Growing Borough; Health and Well Being; Transport and Urban Mobility and Infrastructure*.

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 indicates 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 2036/37 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.

11.2.5. In accordance with the London Plan requirements and in consultation with and endorsed by the GLA, the housing trajectory set out in Figure 4.2.1 demonstrates how Merton's housing target will be met for the Local Plan period 2022/23 – 2036/ 37 ~~2021/22—2035/36~~ using a stepped housing delivery target.

11.2.6. Merton's housing trajectory set out in Figure 4.2.1 is considered an appropriate approach for Merton as it sets out a realistic picture of housing delivery over the Local Plan period. A stepped housing delivery target is appropriate in Merton as there is a significant uplift in the level of housing target between emerging and previous policies, and several large sites will be delivered in phases.

11.2.7. As Figure 4.2.2 below indicates Merton's annual housing target will be set at ~~775~~ 700 homes per annum for the period ~~2022/23~~ 2024/22, increasing to 950 for the period 2025 /26 – 2027/28 ~~2023/24~~, and then increase to ~~1,080~~ 1,555 for ~~2028/29~~ the period

2024/25_ – 2026/27, then further increase to 1,350 for the period 2027/28 – 2028/29. This ensures that Merton's Local Plan housing requirement for the Plan period 2022/23 – 2036/37 including the shortfall of 928 new homes is met.

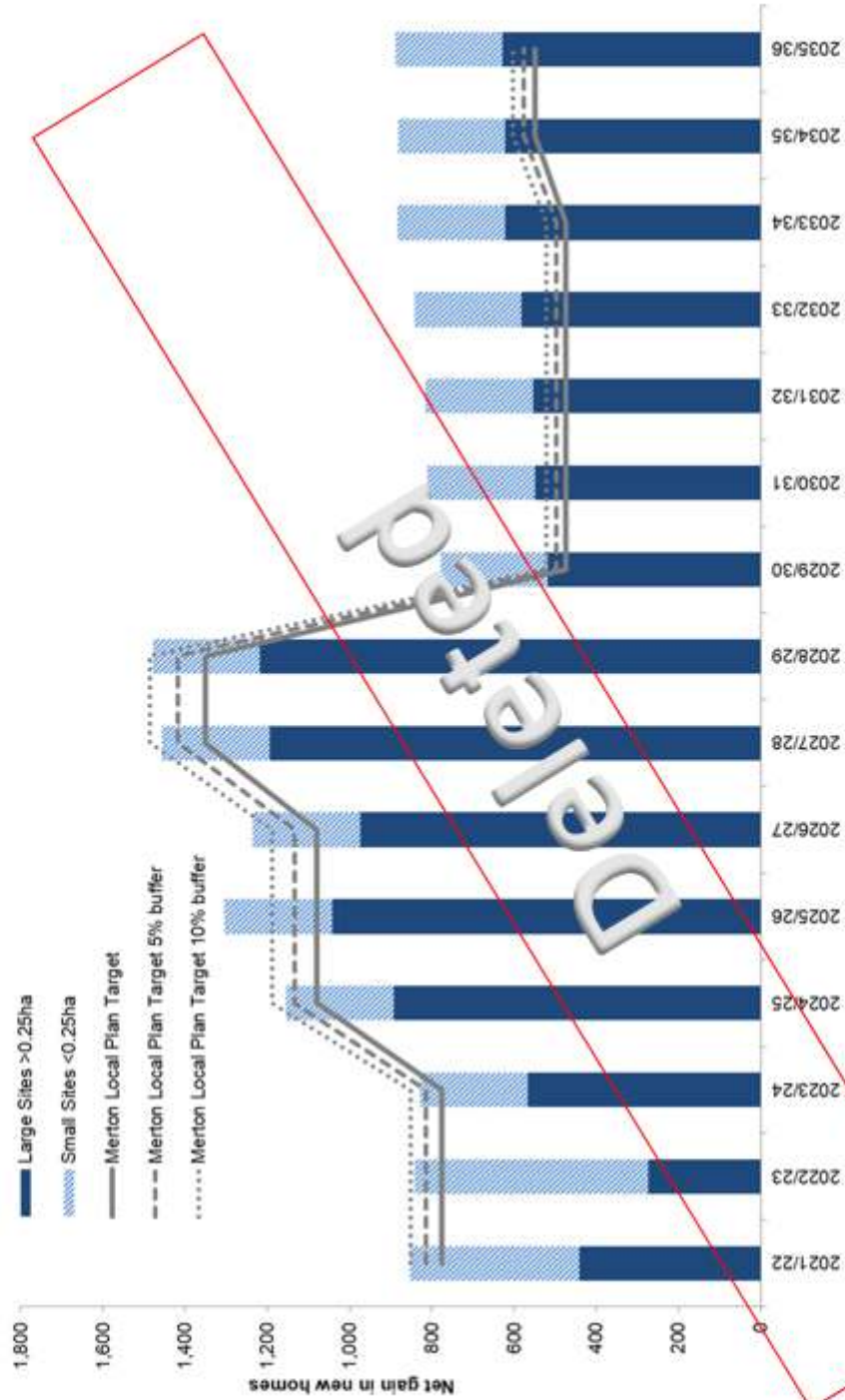
	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	Shortfall from 2019/2 0 and 2020/2 1	Total
Merton Local Plan target	775 750	775 700	775 700	1,080 700	1,080 950	1,080 950	1,350 950	1,350 1,555		8265 6,505
London Plan target	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	928	8265 6,426

Figure 4.2.2 Merton's stepped housing delivery target

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. This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to 2036/37 2035/36 of 1,644 1,096 as indicated in the following table:

Plan period	Target
2029/30 - 2033/34	2,370
<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 1,096</u>
2029/30 – 2036/37 2035/36 Total	4,014 3,466

Merton Housing Trajectory 2021/22 - 2035/36



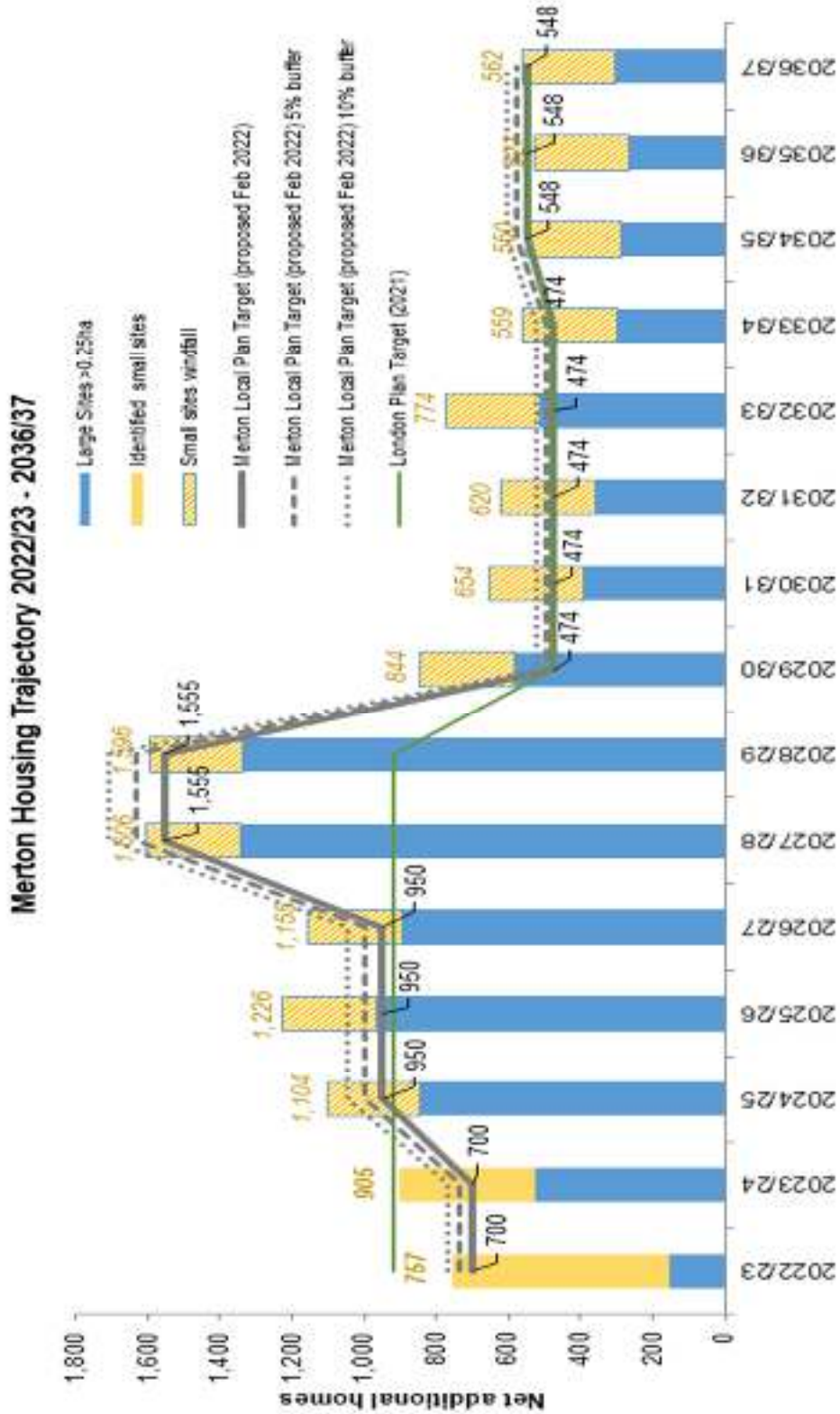
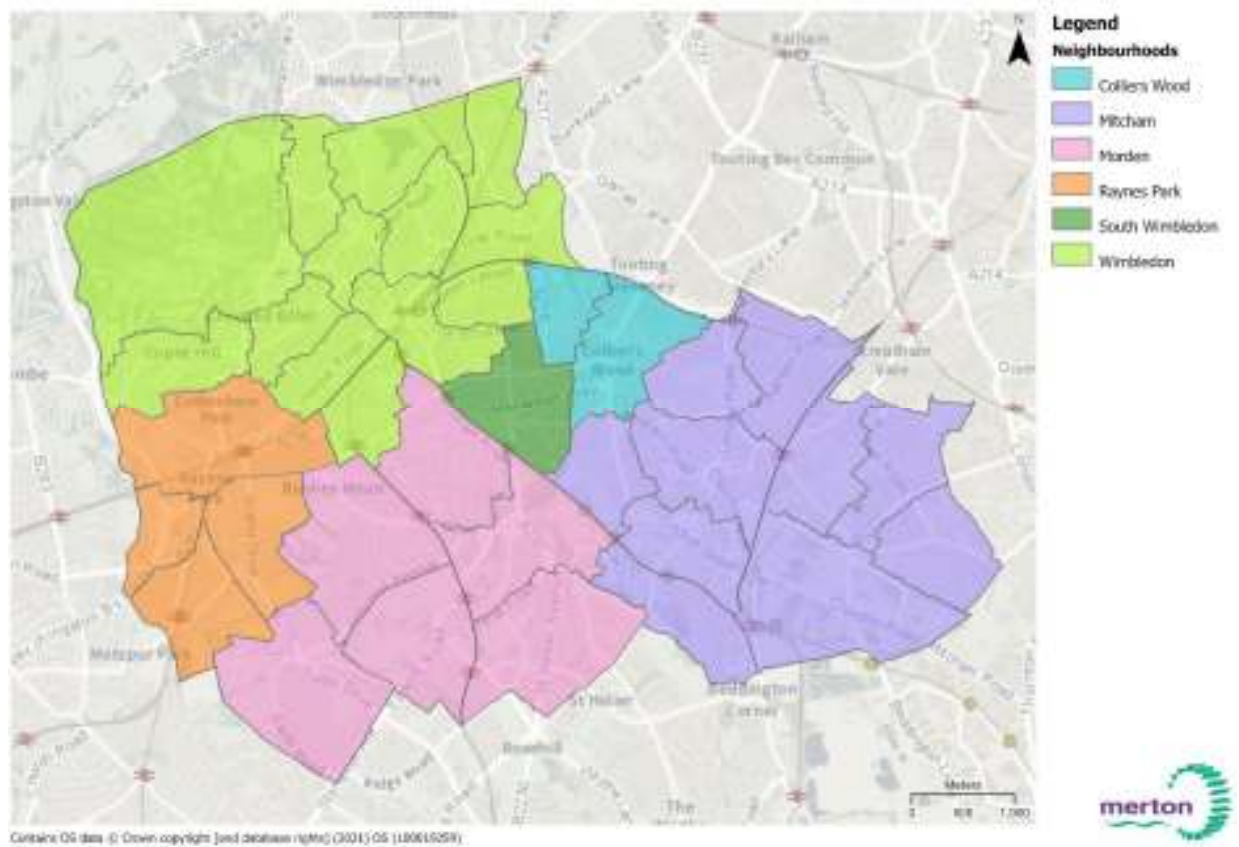


Figure 11.2.1 Merton's Housing Trajectory for the Plan period 2022/23 to 2036/37

- 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 our 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.
- 11.2.10.** The London Plan envisages that key town centres in the borough – Wimbledon, Mitcham, Morden and Colliers Wood – offer ‘high’ potential for residential growth (Table A1.1), with Wimbledon, Colliers Wood and South Wimbledon identified as an Opportunity Area which indicatively is expected to contribute 5,000 new homes and 6,000 jobs. The Opportunity Area homes figure is based on the 2017 SHLAA capacity from 2019 to 2041.
- 11.2.11.** Assessment of projected housing over the Local Plan period by locality, indicates as set out in Fig. 4.2.3 that the majority of residential growth and associated infrastructure and social facilities will take place in Morden, Mitcham and Wimbledon which are

characterised with good public transport access.



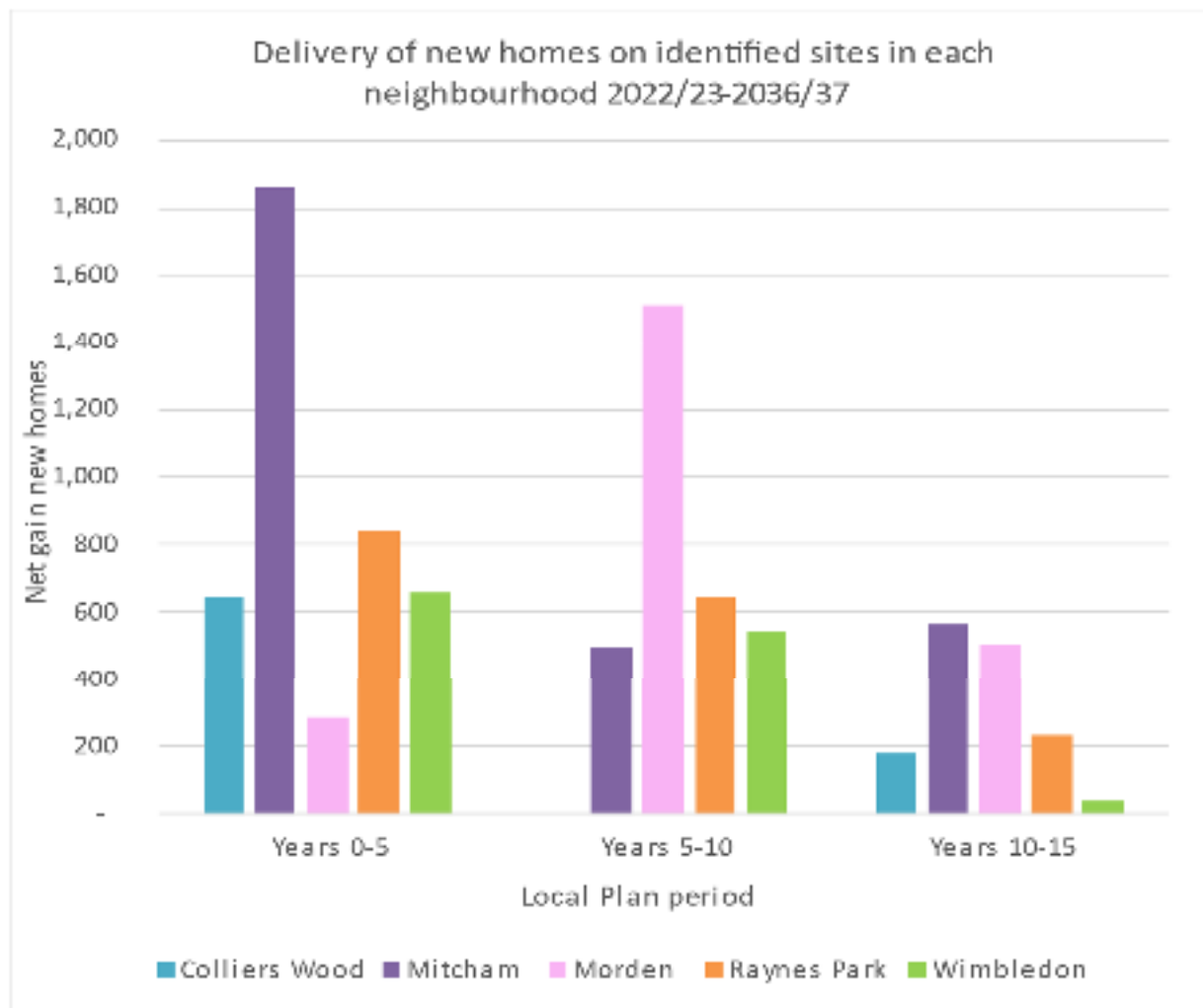


Figure 11.2.3 Delivery plan of new homes by neighbourhood



Figure 4.2.3 Delivery plan of new homes by neighbourhood

- 11.2.12. The regeneration of Morden town centre is a key priority for the council and the emerging Local Plan by means of policy N5.1 and site allocation [Mo1 \[4\]](#), which seek to enable delivery of around 2,000 homes within the Morden Regeneration Zone.
- 11.2.13. Mitcham is proposed to accommodate a range of new homes, including major development sites of Eastfields and Ravensbury estates and other such as Benedict's Wharf. For Raynes Park larger sites close to Shannon Corner and incremental development within the surrounding neighbourhood will contribute to providing new homes. These are set out in more detail in the area-based policies within this Plan.
- 11.2.14. Wimbledon is similarly proposed to accommodate a range of new homes, including major development sites of Wimbledon Stadium, Wimbledon YMCA, and High Path estate regeneration.
- 11.2.15. Merton's Local Plan and accompanying proactive strategies that support future housing delivery, such as [Merton's Borough Character Study](#) and [Small Sites Toolkit](#), are pro-growth and geared towards optimising the provision of good quality and

design-led housing to meet this ambition. For a decade Merton have been allocating sites of any size i.e. no minimum small sites threshold and has taken forward initiatives including town centre regeneration, estate regeneration and modular construction of affordable homes. Merton will continue to bring forward and support these initiatives.

- 11.2.16.** [Merton's Borough Character Study SPD \(2021\)](#) identifies appropriate areas where there is potential for a range of sensitive and extensive character-led growth. At the heart of the study is to ensure that future shaping of the borough is informed by Merton's existing and unique character.
- 11.2.17.** [Merton's Small Sites Toolkit SPD \(2021\)](#) is designed to give designers and developers a clearer picture of what would be considered acceptable development on sites up to 0.25 hectares in the Borough. The toolkit will comprise of guidance notes, case studies and a design and access statement template. The guidance in the toolkit builds on the findings of the Character Study in providing contextual advice to applicants and their design teams. The guidance aims to encourage more development by giving a greater certainty of approval in addition to improving overall design quality.
- 11.2.18.** There are a number of factors outside of local planning authority control that influence housing delivery including macroeconomics, economic effects of Covid-19 house prices, land values, investment confidence and finance availability and unsecured funding for Crossrail 2. However, it is considered that our proactive strategies will contribute to support future housing delivery despite these factors.
- 11.2.19.** Due to the overwhelming need for permanent homes compared to temporary accommodation, we do not support short term rental residential accommodation (either purpose built or converted) such as apart-hotels on sites that are suitable for permanent housing.
- 11.2.20.** In accordance with government requirements we maintain a self-build register. As at June 2021 there were 104 individuals and 9 groups on the part 1 Self-Build Register (meets local connection criteria) and 132 individuals and 1 group on the part 2 Self-Build Register (without a local connection). 17 homes were granted self-build exemption from Community Infrastructure Levy (CIL) in the financial year 2019/20.
- 11.2.21.** Whilst self and custom build homes form part of the overall mix of housing, high demand for sites result in high land values making it challenging for self and custom builders to compete against other house builders to acquire available sites. As self and custom build homes are regarded by mortgage lenders as non-standard homes, obtaining a mortgage for these can be challenging and therefore this type of development is more reliant on self-financing.

11.2.22. As supported by the London Plan, Houses in Multiple Occupation (HMOs) contribute towards addressing needs. As with all homes, HMOs will be expected to meet good standards both for the occupiers and neighbours and we will have regard to relevant guidance in the assessment of HMOs including national guidance, the London Housing Design Standards, the GLA Housing Supplementary Planning Guidance.

Policy No. H11.3

Housing mix

Residential development proposals must contribute to meeting the needs of different households such as families with children, single person households and older people by providing a mix of dwelling sizes, taking account of the following borough level housing mix:

-	1 bed	2 bed	3+ bed
Borough wide	33%	33%	34%

The borough level housing mix will be applied having regard to relevant factors, including individual site circumstances, site location, identified local needs and economics of provision.

Justification

- 11.3.1. Research in London and in Merton shows that there is an overwhelming need in London and in Merton for all types and sizes of new homes. Like much of London overcrowding exist in Merton which need to be eliminated. The 2011 Census indicated that 9.2% of Merton’s households are in overcrowded accommodation. Assessment of housing delivery in the borough over the past 15 years indicates a disproportionately greater delivery of smaller homes compared to larger homes.
- 11.3.2. In 2018/19 11% of the new homes built were studio homes; 33% one bedroom, 33% were two bedrooms, 13% three bedrooms; 7% four bedrooms and 3% were unknown.
- 11.3.3. Merton’s SHNA sets out the size of housing required.

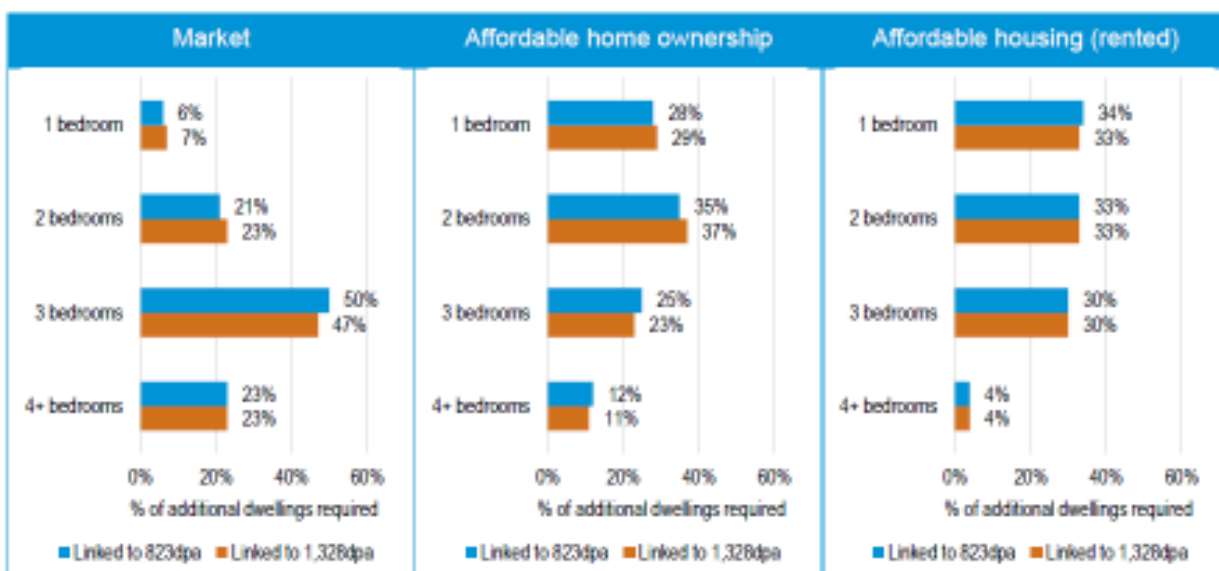


Figure 4.3.1 Size of housing required 2017 – 2035

- 11.3.4. It indicates that for affordable housing need is more heavily skewed towards smaller dwellings, and affordable home ownership sits somewhere in between the market and affordable (rented) housing but closer to the affordable rented sector. For market housing the need is skewed more heavily towards three and four bedroomed homes. Studio apartments do not adequately meet the housing needs of most households.
- 11.3.5. Analysis linked to the demographic change in the period to 2035 set out in Merton’s SHNA supports the housing mix set out in this Policy H11.3 as an appropriate mix. In the affordable sector it is recognised the role which delivery of family homes can play in releasing supply of smaller properties for other households; together with the limited

flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.

- 11.3.6.** Based on Merton's SHNA evidence it is expected that the focus of new market housing provision will be on two and three bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2 and 3 beds) from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to come and stay.
- 11.3.7.** We are keen to encourage socially mixed, sustainable communities with a greater choice and mix in the size, type and location of housing. Schemes should seek to reflect the diversity of the local population, local needs and provide an appropriate mix of smaller and larger homes including houses and flats to meet a mix of different households such as single households, families with children and older people.
- 11.3.8.** In assessing development proposals, we will take account of the housing mix proportions set out above.
- 11.3.9.** This mix is informed by a number of factors, including, local housing needs research deliverability, viability, affordability, land availability and data concerning waiting lists.
- 11.3.10.** The borough level housing mix proportions will be applied having regard to relevant factors including individual site circumstances, site location, identified local needs, economics of provision such as financial viability and other planning contributions. Where a developer considers a site unsuitable to apply the borough level housing mix set out in this Policy H 11.3, the developer will be responsible for demonstrating why this is the case.
- 11.3.11.** Gated development may address security concerns; however, they restrict public access and therefore, choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion.

Policy No. H11.4

Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.

- a. The suitability of proposals for supported care housing will be assessed having regard to the following criteria:
 - i. Demonstrable need.
 - ii. The proximity of the site to public transport facilities.
 - iii. The provision of a safe and secure environment.
 - iv. The provision of an adequate level of amenity space which is safe and suitable.
 - v. The provision of adequate parking facilities for residents, staff and visitors.
 - vi. The convenience of the site's location in relation to local shops, services and community facilities.
 - vii. The quality of accommodation complies with all relevant standards for that use.
- b. Generally, proposals for supported care housing will be expected to provide affordable housing in accordance with *Strategic Policy H11.1 Housing Choice*, unless nominations for people in housing need can be made available through the council.
- c. We will resist development which results in the net loss of supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system unless either:
 - i. adequate replacement accommodation satisfies criteria H11.4 a (i) to (vii) inclusive above; or,
 - ii. it can be demonstrated there is a surplus of the existing accommodation in the area; or,
 - iii. it can be demonstrated that the existing accommodation is incapable of meeting relevant standards for accommodation of this type.
- d. Where we are satisfied that the requirements of criterion (c) of this policy have been met, we will require that an equivalent amount of residential floorspace (Use Class C3) to be provided to help meet Merton's need for permanent homes. These proposals will be considered in respect to *Strategic Policy H11.1 Housing Choice*.

Justification

11.4.1. Policy H11.4 relates to any form of housing if it has been designated for use by vulnerable people or people being housed as part of the criminal justice system (bail / probation hostel) and commonly accommodates residents who get support from designated members of staff. It includes the following forms:

- Self-contained homes where vulnerable people, or people being housed as part of the criminal justice system live individually or as part of a family (usually in use class C3).
- Shared homes occupied by no more than 6 people (usually in Use Class C3 but where no care is provided on-site some fall within Use Class C4).
- Clusters of self-contained homes or self-contained homes / bedsits within a scheme designated for vulnerable people, where low intensity support is available, sometimes on site (usually in Use Class C3, depending on the nature of the support).
- Hostels for a number of households or individuals. The occupiers are usually linked in terms of circumstances or age group. There is usually a common management regime and some shared facilities. Hostels are outside any use class.
- Care homes and other supported accommodation where care is provided 24 hours a day (usually in Use Class C2).
- Secure residential institutions (usually under Use Class C2A).

11.4.2. This Policy H11.4 does not relate to:

- Self-contained homes that are suitable to meet general needs.
- Hostel accommodation aimed at other non-vulnerable groups such as students and backpackers; or,
- Other types of accommodation in Use Class C2 but not specifically for vulnerable people, such as hospitals, boarding schools, residential colleges and training centres.

- 11.4.3.** Vulnerable people include those with physical and sensory impairment, a disability, drug and alcohol dependency or people who have experienced or are at risk of violence (e.g. domestic or hate crime).
- 11.4.4.** Care for the elderly, the vulnerable or disadvantaged groups and for persons with health problems, learning difficulties, mental illness or physical disabilities are becoming increasingly community-based. People are increasingly choosing to live in their own homes with some supported care and assistance, or in supported communities.
- 11.4.5.** Client groups living in supported accommodation include older people, homeless people with support needs; people with mental health problems; ex-offenders; people with physical disabilities and sensory impairment; people with learning disabilities; people with alcohol problems or HIV/AIDS, and people experiencing domestic violence or victims of hate crime.
- 11.4.6.** A variety of supported care accommodation is required for persons who require different levels of assistance, support or care in order to live independently. We encourage the provision of non-institutionalised supported care housing with self-contained facilities for which there is demonstrable need. Supported care housing may include sheltered accommodation, extra care housing, and other types of care homes, on-site accommodation for care workers, rehabilitation facilities, crisis response, as well as respite for carers.
- 11.4.7.** Generally, supported care housing will be located within easy access to shopping facilities and services in locations with good access to public transport, or with adequate on-site facilities, because of low car ownership and in some instances reduced mobility of the client group. This would be considered on a case-by-case basis having regard to a number of factors including the number of clients, staff and visitors and the likely mobility of the clients. Residential locations may be appropriate. Town or local centres may also provide suitable opportunities for provision, given the proximity of such locations to good public transport and local amenities, but this needs to be balanced against other relevant suitability factors e.g. noise.
- 11.4.8.** High quality design can help to provide design solutions (e.g. ramps and levelled changes) that overcome topological issues and provide accommodation that is fit for purpose.

- 11.4.9.** Supported care housing should incorporate designed security features that create a safe place to reside where opportunities for criminal behaviour are reduced. Design should consider the principles contained in government guidance on Safer Places Secured by Design guidance and Royal Town Planning Institute (RTPI) *Dementia and Town Planning: Creating better environments for people living with dementia* and other publications mentioned in the health and wellbeing policies in this plan.
- 11.4.10.** Housing sites that have a lower market value than those available for general market housing are rare. To help meet Merton's housing needs as identified in the London Plan, we will resist development that would involve the net loss of residential floorspace.
- 11.4.11.** Generally, proposals for supported care housing will be expected to provide affordable housing in accordance with this Local Plan's strategic policy H11.1 on Housing Choice, unless nominations for people in housing need with a reasonable preference on Merton's council housing waiting list, or people in housing need referred by one of our nomination panels for vulnerable people can be made available through the council.
- 11.4.12.** Where self-contained housing (e.g. sheltered housing categories 1, 2 and 2.5, and extra care housing) is proposed for occupants to buy, rent or lease we will seek affordable housing in accordance with Strategic Policy H11.1 Housing Choice. By contrast residential care institutions (usually in Use Class C2 / C2A) operate on a fee charging basis, with occupants not given a tenancy, and often moving in and out of these institutions depending on their care needs. Local authorities do refer people to care institutions, via adult social care services rather than from the Housing Register. As such it is unlikely that care institutions will be considered in respect to Strategic Policy H11.1 Housing Choice concerning affordable housing provision. However, we will assess all proposals on a case by case basis.
- 11.4.13.** Proposals must demonstrate that they cater for needs identified in a Local Housing Market Assessment or in an appropriate needs assessment such as that of a recognised public body. There is a recognition that the private sector also caters for those in housing need and that this role in partnership with the council is continuing to grow as this sector responds to the falling levels of public expenditure.

Policy No. H11.5

Student Housing, other housing with shared facilities and bedsits

- a. The development of student housing, other housing with shared facilities and bedsits is supported provided that the development:
- i. will not involve the loss of permanent housing.
 - ii. will not compromise capacity to meet the supply of land for additional self-contained homes.
 - iii. meets an identified local need.
 - iv. is well designed and positively contributes to residential character and amenity.
 - v. complies with all relevant standards for that use; and,
 - vi. is fully integrated into the residential surroundings.

Additionally, with regards to student housing.

- vii. caters for recognised educational establishments within a reasonable travelling distance.
- viii. provides purpose built dedicated floorspace that is managed for cultural or arts studios or activities.
- ix. during term-time, it is available exclusively to students.
- x. includes a range of layouts including those with shared facilities.
- xi. is located in an area well served by public transport concerning the recognised higher educational establishment it serves.
- xii. provides high quality cycle parking facilities.
- xiii. has an ownership or management arrangement secured by legal agreement in place with the recognised higher educational establishment it serves; and,

- xiv.** Ensure that at least 35% of the accommodation is secured as affordable student accommodation or 50% where the development is on public sector land or where redevelopment would result in a loss of industrial capacity as defined through the London Plan and associated guidance.
 - xv.** Where requirements in this policy H11.5 from (vii) to (xiv) inclusive cannot be demonstrated the proposal will be considered under Policy 11.1 Housing Choice in respect of affordable housing provision.
- b.** We will resist development which results in the net loss of student housing and other housing with shared facilities and bedsits unless either it can be demonstrated that:
- i.** there is a surplus of the existing accommodation in the area; or,
 - ii.** the existing accommodation is incapable of meeting relevant standards for accommodation of this type.
- c.** Where we are satisfied that the development results in the net loss of student housing, other housing with shared facilities or bedsits, is justified, we will require that an equivalent amount of residential floorspace or permanent self-contained housing in Use Class C3 to be provided and these proposals will be considered in respect to Strategic Policy H11.1 Housing Choice.

Justification

- 11.5.1.** This policy relates to student housing and housing with shared facilities and bedsits other than that to which Policy H11.4 applies (supported care housing for vulnerable people or people housed in secure residential institutions as part of the criminal justice system).
- 11.5.2.** A recognised higher educational establishment generally refers to those funded by the Higher Education Funding Council for England (HEFC). Wimbledon College of Art, Wimbledon is found within Merton. Additionally, there are several higher education establishments found wholly or partly within neighbouring south London boroughs which are Kingston University, Roehampton University, St George's Medical School and St Mary's University College Twickenham.
- 11.5.3.** Student accommodation is both a local and strategic issue. The provision of student housing, other housing with shared facilities and bedsits can make a useful contribution to creating mixed and inclusive communities and meeting London's housing need. However, addressing these demands should not compromise the borough's capacity to meet the relatively more pressing need for conventional permanent self-contained homes, affordable homes and family homes.
- 11.5.4.** Merton is currently meeting its share of London's general housing needs and can demonstrate a 5-year supply of deliverable housing sites. However, Merton is characterised by small sites for delivering new homes, which limits the opportunities to actively promote housing delivery.
- 11.5.5.** The need for more housing in the borough and the paucity of sites, particularly large sites, means that the provision of student housing could further worsen the challenge meeting the needs for permanent homes.
- 11.5.6.** There is an overwhelming need to provide additional conventional housing in Merton. It is considered that set within this challenging context, the requirement for student accommodation to cater for recognised educational establishments within Merton or neighbouring south London boroughs of Croydon, Lambeth, Kingston-upon-Thames, Richmond, Sutton and Wandsworth strikes a suitable balance towards meeting the Mayor's strategic and local requirements for student housing, whilst minimising the compromise on Merton's capacity for conventional homes. It is also important that the provision of new student accommodation is located close to their places of study, as inadequate provision would result in students having to travel long distances to attend their place of study contrary to sustainable development principles.

- 11.5.7.** Housing with shared facilities form a significant part of the private rented stock in Merton. The precise definition of housing with shared facilities and bedsits is complex but includes the following groups:
- A bedsit where the bathroom is shared with tenants of other bedsits.
 - A flat in a house whether bathroom facilities may or may not be shared with other tenants.
 - A room in a shared house where the bathroom and kitchen facilities are shared with the tenants of the other rooms, but the tenants do not live with the other tenants as part of a 'household', for example don't cook for one another and eat together like a family would.
 - Rented rooms provided by a resident landlord.
 - Bed and breakfast hostels.
- 11.5.8.** In line with the London Plan, we will resist the loss of permanent self-contained homes including its loss from conversion to short-stay accommodation intended for occupation for periods of less than 90 days.
- 11.5.9.** Student housing, other housing with shared facilities and bedsits are often associated with a concentration of relatively short-term residents. We will assess these having regard to any existing concentrations in the area, the impact of new occupiers on local services and facilities and the wider housing mix. Possible concerns such as noise disturbance and increased demand on local facilities and public transport need to be carefully considered and addressed in relation to these proposals to ensure that adverse impacts on existing longer-term residents are minimised.
- 11.5.10.** Schemes will be considered on a scheme by scheme basis having regard to census information, Merton's Authorities Monitoring Report and permissions for student housing schemes in the area.
- 11.5.11.** Student housing can positively contribute to mitigating pressure on the stock of private rented homes in Merton provided that it is genuinely aimed at higher education establishments. We will use design mechanisms, planning conditions and / or legal agreements as appropriate to prevent lease, sale, use or occupation of the student accommodation as general market housing and to limit their term time occupation to students registered at higher education establishments that are based in Merton or the adjoining boroughs and supported by the Higher Education Funding Council for England.

11.5.12. Student housing developments will also be expected to provide adequate floorspace, usually on the ground floor of the development, which has favourable management terms for cultural or arts studios or other activities. Wimbledon School of Art is Merton's only third-level education provider, affiliated to the University of the Arts, London. We will encourage developer to work with specialist organisations that rent and manage floorspace dedicated arts and cultural activities.

Policy No. H11.6

Accommodation for Gypsies and Travellers

Existing legally established Gypsy and Traveller accommodation sites will be retained and protected from redevelopment except where the same number of pitches is provided on an alternative site in the borough.

Proposals for additional, alternative or new Gypsy and Traveller sites will be assessed having regard to the following criteria:

- a. The provision of on-site landscaping, which seeks to enhance the amenity of the site and which facilitates the integration of the site with the surrounding environment and amenity of occupiers of adjoining land.
- b. Access, proximity to a main road, parking and area to allow turning and manoeuvring.
- c. Proximity to shops, schools, health services and other community facilities.
- d. Provision of appropriate on-site facilities such as children's play facilities.
- e. The suitability of ground conditions, particularly in respect to the potential to flooding.
- f. The need or demand for accommodation provision and the available capacity on existing sites in the borough.

Justification

- 11.6.1.** The council’s Gypsies and Travellers site is located on Brickfield Road and is managed by Clarion Housing. Merton’s Accommodation Needs Assessment of Gypsies and Travellers Research (2013), indicated that for the period of 2014 - 2019 re-letting of vacant pitches would address identified needs. There are no known Travelling Show people residing in Merton and no identified accommodation need for Travelling Show people plots within Merton.
- 11.6.2.** In 2019 Merton’s Gypsy and Traveller Accommodation Assessment (GTAA) was prepared to update the needs identified in the 2013 Study and how this will be addressed over the Local Plan period. The 2019 Study identified future accommodation need for the period 2019-2034 summarised in the following table below:

Table S.1: Summary of Gypsy and Traveller pitch needs 2019-34				
Period	2019-2024	2024-2029	2029-2034	Total
DLP	6	0	0	6
PPTS	0	0	0	0
Work	0	0	0	0

Source: GTAA 2019

DLP = assessment of needs based on the 2017 Draft London Plan definition, now out of date and replaced by 2021 London Plan

PPTS = assessment of need in Merton based on government’s 2015 Planning Policy for Travellers (still in date)

Work = assessment of needs in Merton based on travellers working in Merton (still in date)

- 11.6.3.** The 2019 Study identified that in relation to Gypsies and Travellers, the main drivers of need, based upon the then 2017 Draft London Plan definition (DLP), were from ‘hidden’ (or ‘concealed’ families) and psychological aversion of households living in bricks and mortar accommodation.
- 11.6.4.** With the exception of the 2017 Draft London Plan (DLP) based need within the first five years, the accommodation need arising over the 15 years is all counterbalanced by additional supply emerging over the 15 years (including vacant pitches and pitches becoming vacant over time). With the exception of the need of 6 based on the 2017 Draft London Plan definition, there is no additional need for the local authority to address.

- 11.6.5.** The 2019 Study identified no known Travelling Showpeople residing in Merton and as such no need for plots within the Borough for them. For transit provision it recommended that a corporate policy be established to address negotiated stopping places for small scale transient encampments, and that it continues to work with local authorities across the sub-region to provide new transit provision.
- 11.6.6.** Since the 2019 Study was completed, the London Plan was published in March 2021. The Examination in Public Inspector's report recommended, that the definition of Gypsies and Travellers in the 2017 Draft London Plan should be consistent with national policy (2015 Planning and Policy for Travellers Sites – PPTS). The 2021 London Plan reflects the Examination in Public Inspector's recommendation. As a result, the implications for the 2019 Study findings regarding the need for 6 additional pitches in Merton are no longer valid.

Policy No. H11.7

Build to rent.

Built to Rent schemes must provide:

- a. A minimum of 50 homes.
- b. A mix of housing sizes to reflect local need for rented property.
- c. Up to 3-year tenancies with longer tenancies (three years or more) being available to all tenants. Tenancies should have a six-month break clause in the tenants favour and pre-agreed structured and limited in-tenancy rent increases.
- d. The homes are secured as Build to Rent under a covenant for a minimum period of 15 years.
- e. Security and professional management of the homes.

Development of Build to Rent schemes must meet the requirements of London Plan policy H11 and the Mayor of London's Affordable Housing and Viability SPG (2017), with the intention of maximising the viable supply of affordable homes (known as the affordable housing requirement). In Merton, Build to Rent schemes must meet the following affordable housing requirements:

- f. To follow the Fast-Track Route, Build to Rent Schemes must deliver a minimum of 35% affordable housing provision or 50% where the development is on public sector land or where redevelopment would result in a loss of industrial capacity, comprising of a tenure of at least 30% affordable housing provision at London Living rent equivalent level with the remainder at a range of genuinely affordable rents to meet priority housing need in Merton. If these requirements are not met, the scheme must follow the Viability Tested Route.
- g. The council's nomination rights to secure nomination of tenants to specified affordable homes and the management and monitoring arrangements will be secured via planning obligation (s106 legal agreements) or other appropriate legal deed. All affordable housing elements of the scheme must be affordable in perpetuity.
- h. A clawback mechanism must be in place that ensures that where any of the Built to Rent homes are sold within the 15 years this will trigger a penalty charge towards affordable housing provision in accordance with Policy H4.7(f).
- i. Where the requirements of H11.7(f) above are not met, schemes must follow the Viability Tested Route requirements set out in London Plan Policy H5 and The Mayor of London's

Affordable Housing and Viability SPG (2017). Viability Assessments should include taking account of the differences between development value of the Build to Rent scheme and Build for Sale scheme and be undertaken in line with the Mayor of London's Affordable Housing and Viability SPG (2017).

Justification

- 11.7.1.** Build to Rent schemes contribute to increasing the range and offer of homes available to Londoners which is supported. Build to Rent schemes must provide at least 50 homes in accordance with the requirements of London Plan policy H11.
- 11.7.2.** Build to Rent schemes may be attractive to potential tenants given the longer tenancies and on-site maintenance teams. However, these unique features of build to rent can result in higher than average rental costs, worsening an already critical issue for many renters, especially in London.
- 11.7.3.** Given the borough's limited land availability and the significant need for more housing, and in particular the pressing need for affordable housing that genuinely addresses those in housing need in Merton, we support the incentives and approach set out in London Plan Policy H11 to encourage affordable housing provision as part of Build to Rent schemes.
- 11.7.4.** By having nomination rights, we will help to ensure that prospective tenants have been appropriately vetted as in genuine need in terms of the inability to access rented accommodation on the open market locally.



CHAPTER 12. **PLACES AND SPACES IN A GROWING BOROUGH**

Introduction.

How our streets, town centres, public spaces and neighbourhoods look, feel and function is important for our sense of wellbeing and safety. Merton is made of a number of distinct and diverse places that collectively form the unique character and identity of Merton.

The need to deliver more than 10,000 homes in Merton by 2036/37 does not outweigh the need for developments to be design-led. The Council will require all development to be of the highest design quality and contribute to the Merton's long-term economic prosperity, quality of life and a net zero carbon future.

The policies in this chapter aim to ensure that all future development is well designed, functional and contributes positively to the borough.

Strategic Policy D12.1

Delivering well designed and resilient neighbourhoods.

Developments in the borough are required to meet the highest standards of design, function and construction and help contribute to a net-zero carbon and climate-resilient future. They must respect and positively respond to their context, townscape, landscape and public realm to strengthen Merton's character. Successful neighbourhoods are much more than just buildings. Historic environments, mature vegetation and existing communities all contribute to successful places, and as such must be considered when designing. Delivering sustainable neighbourhoods is as important as delivering the homes themselves.

To achieve this, development should:

- a. Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and have regard to existing and emerging good practice guidance.
- b. Champion sustainable design and construction principles, in order to minimise greenhouse gas emissions by considering energy efficiency, re-use of materials and buildings, waste and water management, biodiversity and the use of low carbon and renewable energy sources early in the design process, as set out in policies elsewhere in this plan. Development should be fully adaptable and resilient to the impacts of a changing climate, including overheating, flooding, water shortages/drought and subsidence, and will not exacerbate any climate change impacts elsewhere.
- c. Encourage and enable sustainable and healthy lifestyle choices through effective public realm that facilitates active modes of transport as, set out in the chapters in this Local Plan on Health and Wellbeing and Transport.
- d. Ensure that the site of the development is appropriate for its proposed function and use through the analysis of site constraints such as air quality, noise pollution, land contamination, flooding (from all sources) and daylight and sunlight.

- e. Seek to appropriately engage with the local communities and stakeholders and that the design has been informed by this as set out in the London Plan, Policy GG1.
- f. Enhance social cohesion and mental and physical wellbeing and support the needs of all of Merton's communities through creating sustainable buildings, spaces and environments that are well-managed, accessible, inclusive, child friendly and intergenerational in line with the chapter on Health and Wellbeing.
- g. Conserve and enhance Merton's heritage assets and distinctive character ~~using Merton specific guidance, such as Merton's Borough Character Study and Conservation Area Appraisals.~~
- h. Be well-designed from the large scale to the detailed level, being well thought out internally and considering essential practical details early on in the process so they do not undermine quality or cost more at the construction stage.

Justification.Supporting Text

- 12.1.1.** The character, distinctiveness and viability of a successful area often lie in the quality of its built environment and public realm. High quality design of buildings, places and spaces can create a high quality and attractive environment which sets a positive context for the development of successful places and sustainable communities. To help deliver the principles of good design throughout the borough, Merton Council has produced a variety of Supplementary Planning Documents that provide good practice approaches to design, such as Merton's Borough Character Study, **and** Conservation Area character appraisals **and Small Sites Toolkit.**
- 12.1.2.** Designing with sustainable and construction principles from the start can be help minimise costly changes later on in the process. Buildings that are designed with sustainability at the fore can also be more cost effective in their operation and their delivery.
- 12.1.3.** Principles of good urban design are not just applicable to the quality of individual buildings, but to the arrangement of buildings and public spaces in their environment, how they relate to their context, the spaces they create and also to the way an area functions. These principles need to be applied not just to the physical appearance of a building, but also to its functions and the way it relates to the surrounding area and wider public realm. Good urban design creates buildings and environments that are long lasting and strengthens communities.
- 12.1.4.** **Development in the borough must consider all sections of the community, in particular disabled people. An inclusive environment is one, which can be used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people as set out in the chapter Health and Wellbeing.**
- 12.1.5.** **Development should pro-actively plan for health and wellbeing through sport and activity. Developers should consider following Sport England and Public Health England's Active Design 10 principles, guides and checklist to help ensure their development's layout and design helps to promote active lifestyles.**

- 12.1.6.** The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, resulting in better places in which to live and work.
- 12.1.7.** The National Planning Policy Framework (NPPF) provides national policy guidance on design. This policy is a strategic policy, produced in accordance with para 20.d) of the NPPF. It looks to create sustainable neighbourhoods that will last well beyond the plan period and not require future public or private sector intervention to address future strategic or structural issues.
- 12.1.8.** The production of design guides and codes can provide maximum clarity about design expectations at an early stage and should be consistent with the principles set out in the National Design Guide and National Model Design Code. This is highlighted in the NPPF para 128 and 129.
- 12.1.9.** The NPPF states that good design is a fundamental part of the purpose of the planning and development process; and that plans should set out clearly the council's design vision and expectations. More specifically, the NPPF (para 130) states that planning policies and decisions should ensure that developments:
- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, taking into account the impacts of climate change;
 - Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

12.1.10. Merton's target of becoming a carbon neutral borough by 2050, as set out in Merton's Climate Strategy and Action Plan, means that future development must contribute to achieving this target.

Policy D12.2

Urban design

Successful places are about people. The spaces between buildings are as important as the buildings themselves. Developments (small and large) must be based on sound and established principles of good urban design. Well-designed places create a strong sense of community and improve the social and emotional wellbeing of those who use it and ensure local resilience to the impacts of climate change such as flooding (from all sources), overheating and subsidence. This policy drives for the creation of inclusive, sustainable, efficient and high quality design and layout of the urban and suburban environment found in Merton.

To achieve this, development should:

Shaping places

- a. Be of the highest standard and ~~have regard~~ ~~adhere~~ to the most appropriate policy guidance and best practice.
- b. Ensure that urban layouts are easy to navigate and permeable to cyclists and pedestrians through recognisable streets and spaces that link in seamlessly with surrounding development and facilitate active modes of transport.
- c. ~~That it has~~ Have an appropriate street level presence and roofscape ~~and that creates~~ a positive relationship to neighbouring buildings and spaces, enhance the townscape and landscape of the area and is informed by bespoke analysis of the site context, including the area's character, identity and topography.
- d. Ensure that the form and layout of new development should be street-based with clearly identifiable publicly accessible streets defined by buildings that front the street and maximise the number of entrances onto the street.
- e. Ensure that scale, height, mass, bulk and form in its site and context is appropriate and has explored its visual impact from short, mid and longer views where applicable.

-
- f. Provide and reinforce a clearly identifiable network of public streets and spaces that constitute the public realm, based on the creation of defensible space and natural surveillance, creating an appropriate gradation between public and private space.
 - g. ~~Proposals for changes to and enhancement of the highway and public realm shall~~ If proposing changes to the highway and/or public realm, be designed according to best practice, minimising clutter and, depending on their scale and impact, may be subject to a design review process. Proposals should include sustainable drainage measures (SUDS), urban greening features and tree planting where possible and appropriate.
 - h. Be economically and socially sustainable, by offering variety and choice, and by being able to adapt to changing climatic, social, technological and economic conditions without the need for future remedial intervention.
 - i. Consider the maintenance and enhancement of views, panoramas and prospects and their settings and, where appropriate, create new views.
 - j. If located in town centres, high streets and other shopping areas: ~~the~~ development must ~~also~~ interact positively with the public realm by ~~the creation of~~ creating active and attractive frontages that promote natural surveillance through visibility between the street and the interior of the building. ~~and~~ Street frontages should not create dead frontage through lack of windows or provision of advertising, shelves or screening which prevents easy visibility between the ground floor and the street.
 - k. Positively contribute to the amenity of ~~the~~ designated open space or Metropolitan Open Land that is in close proximity if applicable.
 - l. Achieve high quality urban and building design from the outset and is not undermined by variations that individually or collectively devalue design quality, particularly those variations that are sought after the grant of planning permission.
 - m. Consider on larger sites or locally significant sites, the benefits of temporary uses before and during construction stages.

Public Realm

- n. Ensure it is accessible, inclusive, child friendly and intergenerational. It must enable an active lifestyle by designing walkable and attractive public realm and encouraging active modes of transport in line with the chapter on Health and Wellbeing and Sustainable Travel.
- o. Support the council's vision for a net-zero carbon and climate-resilient future by taking a sustainable approach to design and delivery in line with the chapter on Climate Change. as set out in the policies on 'Climate Change'.
- p. Contribute to a safe, attractive, uncluttered, co-ordinated public realm that enhances the site's setting and connection with the surrounding neighbourhood.
- q. Prioritise pedestrians and cyclists and encourage greater walking and cycling for all around the area in accordance with Transport for London (TfL) Healthy Streets Approach.
- r. Use permeable paving, good-quality construction materials, appropriate tree planting (including shrubs) and landscape design which responds positively to the character of the area and is easy to maintain.
- s. Measures such as designing out crime, anti-terrorism, dementia friendliness friendly, green and blue infrastructure and to help manage flood risk should be actively considered at the earliest stage of planning the public realm depending on the location, scale, and setting of the development.
- t. Consider the benefits of inclusive and diverse site specific temporary and long- term public art works that enhance local character and develop a sense of place.
- u. Consider the management of the public realm to provide access needs of all of Merton's communities, including the particular needs of people with disabilities.
- v. Ensure that car parking is provided in accordance with the London Plan maximum standards and does not dominate the street or provide a barrier to walking or cycling or enjoying space safely.

- w. Where construction work and the delivery of equipment and materials damage the public realm such as highways and footpaths, legislation allows the Council to make good any damage caused and recover the expenses incurred.

Sustainable neighbourhoods

- x. Consider the orientation and form of buildings to inform their energy performance early in the design process.
- y. Mitigate the risk of flooding, subsidence, overheating and adverse impacts on the urban heat island, through appropriate design, orientation, layout, materials and use of green and blue infrastructure.
- z. Maximise the opportunity to increase green infrastructure through urban greening such as mature trees and vegetation and demonstrate that appropriate measures have been taken to protect and enhance the natural environment to strengthen the green infrastructure of the borough in accordance with the chapter on 'Green and Blue Infrastructure'.

Justification Supporting Text

Good urban design

- 12.2.1.** As recognised in Policy D3 of the London Plan, developments must take a design-led approach that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. Merton's Borough Character Study provides an analysis of character borough wide and should be used to supplement bespoke site analysis.
- 12.2.2.** Building places based on sound and established principles of good urban design is a fundamental element of successful place-making. It is a holistic approach to the physical arrangement of our environment. It encompasses issues of layout, land use, security, economic development, regeneration, community and social life and the general appearance and attractiveness of places. It is also key to achieving the sustainability of our environments by building places that have inherent longevity and an ability to adapt to changing circumstances inexpensively.
- 12.2.3.** It is important that our urban environments are inclusive, publicly accessible, inviting and easy to understand. This is the form of most of our urban townscape and what works best. It enables places to function efficiently and adapt well to change over time. Changing poor design in the future almost always requires huge upheaval and public expense. Places that work well tend to look after themselves and adapt gradually over time.
- 12.2.4.** The basis for this urban environment is the traditional street, which can accommodate all types of use in a flexible manner. This is recognised in Policy D3 of the London Plan, which states that the form and layout of a place should be street-based with clearly defined public and private environments. A street has a number of essential characteristics. It primarily has a movement function which can be adapted for use by a range of different modes; it is therefore predominantly linear in character and should be designed to indicate that it links one place to another as part of a wider network of streets.

- 12.2.5.** The design of new buildings, particularly taller buildings, on sites in close proximity to designated open spaces and MOL needs to consider the amenity, quality and use of the open space. People use open spaces for a variety of reasons including exercise, play, socialising and relaxing and the visual amenity provided by these open spaces holds a lot of public value. Development in these locations should not have an undue harm to the amenity of the open space and the council may require a Visual Impact Assessment to be undertaken and provided as part of a planning application, if deemed necessary to assess the impact. [See policy D.12.6. for further details on tall buildings.](#)
- 12.2.6.** Sustainable design principles will help Merton achieve the target of a net-zero carbon 2050. Developments that think about sustainability early in the design process can often avoid significant and costly changes that may occur later in the process. See the chapter on Climate Change for more details.

Public realm

- 12.2.7.** A vital part of how we perceive our environment comes from the design, layout and appearance of our streets and spaces – the public realm. New, larger developments create new streets and spaces. Smaller, individual developments affect the appearance and perception of the existing public realm. Careful urban design consideration needs to be given to the impacts on the public realm by all development, from small scale safety and parking schemes to major town centre enhancement projects.
- 12.2.8.** Local streets can take on a stronger ‘place’ character. Streets are physically defined by the buildings that front them and it is therefore important that they do so in a way that reinforces their linear form. Streets are, and should be, public places. The fronts of buildings and their main access points should be directly from the street. This creates a layout that defines the street as a public place and the land further to the rear more private.

-
- 12.2.9.** The council will seek to improve the quality of street furniture, lighting, landscape treatments, surfacing materials and signage in the borough either as part of the development of sites or through environmental improvement schemes.
- 12.2.10.** Transport for London's (TfL) Healthy Streets Approach provides information and guidance on how best to prioritise walking and cycling.
- 12.2.11.** The existence of poor public realm should be no justification for average or mediocre proposals for the public realm. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development including individual buildings, public and private spaces and wider area development schemes. Developments are expected to ensure the establishment of a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
- 12.2.12.** As recognised in Policy D8 in the London Plan, the public realm can encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space.
- 12.2.13.** During construction, the public realm may temporarily be affected as agreed with the Council. However, it is unacceptable for development work to permanently damage the public realm, including roads, footways and other infrastructural items. During construction, measures to protect the public realm must be taken. Section 133 of the Highways Act 1980, amended by Section 6 of the London Local Authorities and Transport for London Act 2013, allows councils to make good any damage caused by works on land adjacent to a publicly maintainable footpath or highway and recover the expenses incurred from the landowner, the person carrying out the works or the person on whose behalf the works were carried out. The Council may require photographs to be provided by the site owner to prove the condition of the public realm prior to work commencing.

Defensible space

- 12.2.14.** Well-designed streets feel safe if they have ‘natural surveillance’ and an appropriate transition from public street to private building – or ‘defensible space’. Natural surveillance is created by ensuring there is an appropriate and complementary mix of uses, particularly at ground floor; by maximising the number of entrances and having clear views between the interior of non-residential buildings and the street – rather than being obscured by blinds, shutters or internal advertising.
- 12.2.15.** Defensible space is important in providing a clear buffer between public and private realm. This helps create a sense of security for residents and can deter opportunistic crime. Defensible space allows for a graduation from public and private by means of landscaped amenity or garden space. This can be effectively utilised for facilities such as bin and cycle storage. Clear boundary treatments such as hedges, walls and railings are important in providing effective defensible spaces. For residential areas natural surveillance is best created by maximising entrances and having good views from habitable rooms directly from the dwelling into the street.

Safety and security

- 12.2.16.** Well-designed places feel safe because they have built-in natural surveillance through the design of buildings and spaces, as well as having complementary mixes of uses and activities. Places that work well and look good also help engender a sense of belonging and local pride, which in itself encourages community participation and helps keep a place safe. Excessive and overt manifestations of security features often have the opposite effect.

Gated development

- 12.2.17.** An example of this is gated development which may address security concerns, however they restrict public access and therefore choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion. It is therefore likely that most types of gated developments will be contrary to this policy and are therefore discouraged by the council.

Policy D12.3

Ensuring high quality design for all developments

Whether the development is for businesses, community services or homes, all buildings in Merton must be of high quality. They must consider their impact on the environment, how people experience the development and how the development responds to its context.

All planning applications ~~shall~~ must be accompanied by a Design and Access Statement (DAS) to visually demonstrate how ~~a~~ the design has developed and to justify an applicant's design decisions.

Proposals for all development should:

Responding to context

- a. Take a design-led approach to development that responds to the sites context and character.
- b. Ensure that the proposed uses are appropriate for the site and are not located in locations that could have adverse effects on the physical and mental wellbeing of its users.
- c. Enhance local distinctiveness by responding positively to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area.
- d. Ensure that the landscape forms an integral part of any new development where appropriate.
- e. If located on a backland site, be subservient in scale, massing and bulk to its host where applicable.

People focussed

- f. Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens.
- g. ~~Protect~~ Ensure new and existing development minimises their impact from visual intrusion, noise, vibrations or pollution so that the living conditions of existing and future occupiers are not unduly diminished.
- h. Ensure the highest practical standards of access and inclusion and be accessible to people with disabilities.
- i. In residential developments, provide an area of communal amenity space in addition to requirements for private amenity space. Site layout, privacy, overlooking and daylight/sunlight requirements should be used to determine the appropriate amount, location, shape and design of such space.
- j. Ensure that the design and management of shared spaces, such as lobbies, corridors and communal amenity, have a positive impact on physical and mental wellbeing through good quality design.
- k. In residential developments, provide a minimum finished floor to ceiling height of 2.5m for at least 75% of the Gross Internal Area.
- l. In residential developments, provide a mix of tenure and unit types with at least 10% of homes that meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings' and all other dwellings meeting Building Regulations Requirement M4(2) 'accessible and adaptable dwellings' as set out in London Plan Policy D7 'Accessible Housing' Policy H11.1.

Fit for purpose

- m. Provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles.

- n. Provide outdoor amenity space, whether public, private or communal which accords with appropriate minimum standards, is efficiently laid out and is compatible with the character of surrounding areas.
- o. Meet, or exceed, the minimum space standards set out in the London Plan, or appropriate space standards, and are of functional size and proportions demonstrating efficient layouts.
- p. Ensure that the traffic and construction activity do not adversely impact or cause significant inconvenience in the day to day lives of those living and working nearby, and do not harm road safety or significantly increase traffic congestion.
- q. Where developments are houses and ground floor maisonettes/duplex units, require a garden with a minimum area of 50m² as a single useable regular shaped amenity space. Flexibility may be applied to constrained sites and higher density development where justified.
- r. Improve biodiversity levels and minimise water run-off. If providing car parking on forecourts and front gardens, applicants must maximise the amount of soft landscaping, use permeable materials and incorporate sustainable drainage measures, using a landscape-led approach to design and not be detrimental to the character of the street or highway safety.
- s. Provide well-designed cycle parking in accordance with London Plan minimum standards ~~and TfL's London Cycle Design Standards that~~ is well integrated with the overall design approach of the development and does not negatively impact on the primary street elevation.
- t. Where cycle and refuse storage is located in front gardens and forecourts, storage units must demonstrate that they are of an appropriate scale and bulk and are located to minimise their visual impact on the street-scene and do not negatively impact the quality of amenity spaces.
- u. Ensure that the design and management of facilities for recycling, storage and disposal of household waste is designed to ensure efficient and effective waste collection, is well

~~designed and is considered as in accordance with Merton's Waste and Recycling Storage Requirements and is~~ part of the overall design approach and does not adversely affect the primary building function, appearance of the building and character of the street.

- v. Ensure refuse facilities are convenient, allowing bins to be manoeuvred easily and include sufficient capacity to accommodate increase recycling requirements. Refuse bins should not obstruct footways, so for sites with restricted access, suitable hardstanding should be provided for bins to be relocated to on collection days. The Council will support underground waste collection systems for major redevelopment schemes where proposed systems are accepted by the council's appointed waste contractor and do not compromise highway safety.

Tackling the climate emergency

- w. Incorporate sustainable design principles early in the design process to make effective use of resources and materials, and minimise water use and CO2 emissions during the construction and operation of the development as set out in the chapter on 'Climate Change'.
- x. Ensure resilience to the impacts of climate change by mitigating the risk of flooding, subsidence, overheating and adverse impacts on the urban heat island, through appropriate design, orientation, layout, materials and use of green and blue infrastructure as set out in the chapter on Green and Blue Infrastructure.
- y. Mitigate overheating through good design, such as orientation, shading, high albedo materials, fenestration, insulation, appropriate ventilation systems and the provision of green infrastructure.
- z. In residential developments, maximise the provision of dual aspect homes. Single aspect homes ~~are strongly discouraged and~~ will only be accepted where they demonstrate they have adequate passive ventilation, daylight and privacy and avoid overheating and are necessary to optimise site capacity through a design led approach, in line with the London Plan.

- aa.** Minimise construction waste and promote sustainable management of construction waste on-site by managing each type of waste as high up the waste hierarchy as practically possible as set out in the chapter on waste management in this plan.
- bb.** Provide appropriate energy efficient external lighting that provides safe and secure environments while not causing light pollution that adversely affects neighbouring occupiers or biodiversity.
- cc.** Conserve and enhance the natural environment, particularly in relation to biodiversity, wildlife habitats and gardens as set out in chapter on Green and Blue infrastructure.
- dd.** In addition to Tree Preservation Orders, retain and protect mature trees and vegetation where applicable as set out in chapter on Green and Blue Infrastructure.

Justification.Supporting Text.

High quality design

- 12.3.1.** London Plan guidance and Merton supplementary planning documents set out best practice design approaches to development and should be used to inform the design process.
- 12.3.2.** Well sized and proportioned rooms contribute to designing successful homes. Housing developments should consider accommodating [Building Regulations Approved Document Part M, Appendix D: Furniture Schedule](#) in their lay outs. [To ensure homes are accessible to everyone regardless of their mobility or age, housing developments should also be step free, accessible and adaptable in line with London Plan policy D7 “accessible housing” and Approved Document M; flexibility may apply within blocks of 4 storeys or less in certain exceptional circumstances as outlined in London Plan policy D7.](#)
- 12.3.3.** The council will expect development to promote or reinforce local distinctiveness and encourage high quality innovative, contemporary and sustainable design. Development proposals will be welcomed that respect the character of the wider area and reinforce a “sense of place” by recognising the local distinctiveness of areas.
- 12.3.4.** What defines a site and area’s characteristics should be set out in each individual proposal by means of a bespoke analysis. This should form part of the Design and Access Statement where one is required, but a similar analysis will be required for smaller developments as well. The analysis should identify positive aspects of local character and how this will be used to inform the design of the proposal.
- 12.3.5.** Merton’s Borough Character Study, Conservation Area appraisals and Management Plans, Masterplans, site specific Local Plans and other available existing analysis should be used to inform the design of the proposal. Applications and Design and Access Statements should demonstrate how this has been done.

- 12.3.6.** Landscaping proposals can be key to knitting buildings, streets and spaces together and should be planned from the start. However, it is not a substitute for good building design and site layout. A poor design cannot be held together by attractive landscaping that does not perform an appropriate landscape function. Landscape design should support principles of good urban design such as natural surveillance, defensible space and community engagement.
- 12.3.7.** Historically, planning guidance has provided clear parameters on separation distances from habitable rooms of neighbouring properties. Adhering rigidly to these parameters can lead an arrangement of buildings that do not reflect the character of the neighbourhoods where they are located, such as more urban settings or tighter mews settings. As such, separation distances used must demonstrate they provide adequate privacy for occupiers and ensure they provide good levels of daylight into the dwellings.
- 12.3.8.** TfL's London Cycle Design Standards provides requirements and advice for the design of dedicated cycle infrastructure.

Gardens and internal space standards

- 12.3.9.** The council will assess planning applications based on the London Plan to set the internal space standards for new homes, hostels, hotels and other residential accommodation. This includes the standards required for a proportion of units to be wheelchair accessible.
- 12.3.10.** For all new houses, the council will seek a minimum garden area of 50 sq.m as a single usable regular shaped amenity space. This requirement may be applied flexibly for higher density developments or constrained sites but this would have to be fully justified in the planning application. For flatted dwellings, a minimum of 5sqm of private outdoor space should be provided for 1-2 person flatted dwellings) and an extra 1 sq.m should be provided for each additional occupant.

- 12.3.11.** Meeting space standards alone does not ensure a design is high quality or fit for purpose. Regular shaped layouts are likely to be most efficient and these are the basis of minimum space standards. Irregular and awkward shaped spaces are likely to be inefficient in their use of space and may severely limit a room's usability and fitness for purpose, despite meeting or even exceeding space standards. This is made clear in the London Plan Policy D6.
- 12.3.12.** External amenity space is an important element in achieving high quality design and pleasant and attractive places to live. Policy D6 of the London Plan prescribes minimum standards for private amenity space for flats.
- 12.3.13.** External amenity space of all kinds must also be fit for purpose, have sufficient privacy, preferably be of a regular shape and receive as much as daylight and sunlight as possible. Communal amenity space provides breathing space between buildings and an opportunity for neighbours to meet and socialise.
- 12.3.14.** Proposals to park in front gardens should use Merton's Vehicle Crossover Information Pack that sets out the required measurements criteria and requirement to use permeable materials and soft landscape to provide adequate drainage.

Refuse and storage facilities

- 12.3.15.** New development must provide appropriate, well managed and easy to access storage and refuse facilities that integrate with the adjoining public realm. To help alleviate servicing concerns developers are required to provide storage and collection solutions, which are safe, attractive and well-designed and to reduce delivery and collection movements.
- 12.3.16.** [Merton's Waste and Recycling Storage Requirements sets out guidance on the siting and design of waste and recycling facilities so that waste collection services in Merton can efficiently collect and dispose of household and other waste and recycling.](#)
- 12.3.17.** Developments that face onto streets greatly contribute to the character of a place. Maximising active street frontages provide more opportunity for natural surveillance and animation facing onto the street. Bicycle, refuse and other back of house uses must consider how they address the street to positively contribute to its character.
- 12.3.18.** Refuse and bicycle stores in front gardens are becoming a popular solution to store bins and bicycles and provide easier access to bicycle use and help organise bins. It is crucial that these structures do not have a significant impact on the street scene, and as such must be located appropriately in the front garden.
- 12.3.19.** Storage structures should be designed in sensitive materials and be the minimum size necessary to reasonably accommodate bicycles and bins. They also provide an opportunity to contribute positively to biodiversity levels with the use of small green roof.
- 12.3.20.** It is difficult to modify a building post design; therefore, it is essential that this process is undertaken at an early design stage. Similarly, development should not rely on the public highway for this purpose. Where potential overspill can reasonably be anticipated the Council will introduce parking and loading controls to manage kerb space.

12.3.21. With the on-going push to increase recycling rates and minimise the amount of household waste going to landfill sites, bi-weekly collection of bins and a variety of other bins, bags and boxes for recycling present households with a number of problems in accommodating these requirements. These include ~~ing~~ providing sufficient off-street storage and that bins are accessible and do not obstruct footways, especially for people with health difficulties, including mobility, sensory and mental health mobility or mental health problems that make it difficult to navigate obstacles, and block~~ing~~ accesses or carriageways on collection days will cause major problems.

Safety

12.3.22. Personal safety and security are important concerns for people in the borough. It is therefore important that the design of development must take account of these requirements, by providing well designed public areas and routes and facilitating the natural surveillance of the public realm from adjacent buildings.

Lighting

12.3.23. Good quality lighting at its basic level is required to provide an appropriate level of safety and security. Beyond this, lighting has a legitimate role to play as a part of landscape design and influencing the character of the public realm. Lighting can contribute towards improving the safety and security of areas. Careful consideration is needed to ensure that places and spaces are appropriately lit and there is an appropriate balance between issues of safety and security and reducing light pollution. Lighting can extend the hours of use of outdoor sporting facilities, especially in the winter months, and can be used to advertise or exhibit particular buildings, landscapes or features. Innovative lighting solutions will be encouraged that maintain a basic safety function, relate well to the function of the street and space and take into account the needs of people with different visual acuity. However, inappropriate and unnecessary lighting or lighting which is insensitively used can adversely affect amenity in terms of light pollution to neighbouring occupiers and to the night sky. When considering light proposals the council will seek ensure that unacceptable levels of illumination are controlled by conditions or that unacceptable proposals are refused planning permission.

Species, habitats and landscape

- 12.3.24.** Developments should not cause significant adverse impacts on species, habitats and landscape. Back gardens are an important element in the borough's wildlife habitat provision and biodiversity. New developments should provide for sufficient space for new planting or existing planting to grow. They should incorporate opportunities including green roofs, roof gardens, terraces, permeable surfaces, window boxes, food growing and climbing plants.
- 12.3.25.** In considering applications for development, good use of all intrinsic site features will be sought. Existing site characteristics prior to the commencement of development will be evaluated. The council will normally impose planning conditions requiring any landscape scheme to be implemented within a specified period following completion of the main building works.

Climate change

- 12.3.26.** The impacts of climate change mean that London is likely to experience more frequent and severe extreme weather events; including higher average temperatures, more prolonged spells of intensely hot weather and higher seasonal and extreme rainfall.
- 12.3.27.** In line with other policies in this plan, applicants will need to demonstrate how their development proposal makes effective use of resources and materials, and minimises water use and CO₂ emissions. This is most effectively and efficiently done by considering these matters at the start of the design process. Considering these issues at the end of the design process can result in unnecessary technological solutions being added to buildings that cost more and do not make most effective use of resources.
- 12.3.28.** The management of waste on construction sites can save costs and result in waste being treated in the most sustainable manner, thereby contributing to the development's attainment of the applicable sustainable design and construction standard and promoting a circular economy.

- 12.3.29.** Dual aspect homes with opening windows on at least two sides have many benefits that can add to the development's success. These include better access to daylight with greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation and more views out.
- 12.3.30.** Single aspect homes are acceptable where they are required to optimise site capacity in a well-designed scheme and where they are laid out and designed to allow for good passive ventilation, daylight, privacy and to avoid overheating. Poorly located, designed and laid out single aspect homes are more likely to overheat as they are more difficult to ventilate, creating undesirable living conditions that can have adverse impacts on health and wellbeing.

Overheating

- 12.3.31.** 20% of homes in England currently overheat even in cool summers and annual UK heat-related mortality is projected to increase from a current baseline of 2,000 heat-related deaths per year to 5,000 per year by 2050. Within London, the challenges of overheating are intensified by the urban heat island effect – caused by the absorption and retention of heat in built-up urban areas.
- 12.3.32.** With our predicted population, the council therefore requires all development to demonstrate that the risk of overheating has been mitigated in any proposed buildings, and to incorporate green infrastructure in line with Policy O8.6 Urban Greening (in Chapter 12 Green & Blue Infrastructure) to help mitigate the urban heat island effect.

- 12.3.33.** Development must prioritise passive design measures to promote cooling (e.g. design, layout, fenestration and orientation) ahead of active forms of ventilation (e.g. air conditioning) so as to limit intensive energy use and waste heat production. However, passive ventilation strategies cannot be considered in isolation of potentially negative external factors such as air quality, security or noise. Energy strategies that rely on passive ventilation must clearly demonstrate that occupants will not be adversely affected by air and noise pollution, or security risks, during periods of warmer weather. Any proposals to use Mechanical Ventilation with Heat Recovery (MVHR) should include summer bypass modes so that heat is not recirculated during warmer months.
- 12.3.34.** Single aspect dwellings can be more difficult to ventilate naturally and may be more likely to overheat. Any single aspect home must be located, laid out and designed to have adequate passive ventilation, daylight and privacy, and avoid overheating without reliance on energy intensive mechanical cooling systems.

Subsidence

- 12.3.35.** Prolonged periods of hot and dry weather and prolonged periods of rainfall, have the potential to result in ground movement which in turn can lead to subsidence. This is due to increased shrinking and expanding of the cohesive London Clay soils which are found in the borough.
- 12.3.36.** All development should look to mitigate and reduce the risk of subsidence through building siting, orientation, proximity to natural hazards such as water courses and mature vegetation. The impacts of climate change mean that London is likely to experience more frequent and severe extreme weather events; including higher average temperatures, more prolonged spells of intensely hot weather and higher seasonal and extreme rainfall.

- 12.3.37.** On sites where ground has a high risk of susceptibility to movement, and if the choice of location for the development is limited, then appropriate structural foundation options should be considered to mitigate against the risk of subsidence. All development should ensure that appropriate projections for temperature changes are considered for the full design life of any proposed buildings and that the risk of future subsidence is mitigated through best practice foundation design, considering the potential for ground movement.
- 12.3.38.** Where tree planting is proposed, species selection and location should be carefully considered to mitigate the risk of subsidence.

Policy D12.4

Alterations and extensions to existing buildings

Most of the development that takes place in Merton is alterations and extensions to existing buildings. This policy ensures that inclusive, sustainable, efficient and high quality design is also maintained for existing building across the urban and suburban environment found in Merton.

To achieve high quality design and protection of amenity within the borough, alterations or extensions to buildings will be expected to meet the following criteria:

- a. Be of high quality design that responds to the character of the neighbourhood.
- b. Respect and complement the design and detailing of the original building.
- c. Respect the form, scale, bulk, and proportions of the original building.
- d. Use robust external materials that will be appropriate to the original building and to its surroundings.
- e. Respect space between buildings where the rhythm contributes to the character of the area and to avoid long conjoined facades.
- f. Complement the character and appearance of the wider setting;
- g. Ensure that noise, vibrations or visual disturbance resulting from the development do not diminish the living conditions of existing and future residents;
- h. Where the proposal incorporates a new or altered roof profile, ensure that materials are sympathetic to the original building and the surrounding area;
- i. Seek to minimise carbon emissions from existing buildings in accordance with the chapter on Climate Change
- j. Ensure proposals for dormer windows are of a size and design that respect the character and proportions of the original building and surrounding context, do not dominate the

existing roof profile and are sited away from prominent roof pitches, unless they are a specific feature of the area;

- k.** Ensure that roof forms and materials are of an appropriate size, type, form and material for the existing building, such that they are not unduly dominant, and respect the prevailing positive characteristics of the area.
- l.** Demonstrate that the proposal does not significantly impact the quality of neighbouring buildings and amenity through overshadowing and overlooking.
- m.** Seek to improve levels of biodiversity through interventions such as green roofs, sustainable drainage or soft landscape.
- n.** Ensure that there is no increase in risk of flooding to surrounding area, either due to displacement of floodwater or diversion of flood flowpaths.

Justification Supporting Text

Well-designed buildings

- 12.4.1.** Well-designed buildings make an important contribution to the character and quality of an area. Extensions must be as well designed and architecturally competent as new buildings. Whether visible from the street or not, all extensions should be of a high quality design. Generally, extensions to be sited to the rear of the building and have a minimal impact on the street scene. Side extensions and those on street corners which will be visible must exhibit particular care in their design and how they relate to both the host building and the street scene. High quality contemporary extensions in a contrasting architectural style to the original may in some cases be appropriate. The council will welcome these on a case by case basis. They must be of the highest architectural quality and thoroughly reasoned in relation to the host property and immediate context.
- 12.4.2.** The council's Borough Character Study, Conservation Area Character Appraisals SPD's should be used to provide applicants with design guidance.
- 12.4.3.** The borough has a few examples of high quality contemporary infill development and wishes to promote this further in the right context. It will therefore encourage new extensions to be contemporary in form where the architectural quality is exceptional and the building and context can sustain this without having a negative impact on the host building or adversely affecting a positive prevailing street character.

Design and Access Statements

- 12.4.4.** Development proposals should be based on an assessment of character and recognise the local distinctiveness of areas and emphasise a positive local sense of place. Planning applications shall be accompanied by a Design and Access Statement (DAS) to demonstrate how the design has been arrived at.

Policy D12.5

Managing heritage assets

Merton has a wealth of heritage assets including conservation areas, listed buildings and structures and scheduled ancient monuments. This policy aims to conserve and enhance Merton's heritage assets, their settings and distinctive character.

- a. Development proposals affecting a heritage asset or its setting will be required to be in accordance with the ~~following criteria:~~
 - ~~i. principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, and the London Plan, and Historic England guidance;~~
 - ~~i. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.~~
- b. All development proposals associated with the borough's heritage assets or their setting will be expected to demonstrate, within a Heritage Statement, how the proposal conserves, and where appropriate enhances the significance of the asset in terms of its individual architectural or historic interest and its setting.
 - a. In accordance with the NPPF, any alteration or destruction of a heritage asset, or development that has an impact on the setting of a heritage asset will require clear and convincing justification. Substantial harm to or loss of:
 - i. Grade II listed buildings or registered parks or gardens, should be exceptional
 - ~~ii. Assets of the highest significance, grade I and II* listed buildings or registered parks and gardens should be wholly exceptional. Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.~~

- b.** Proposals that will lead to substantial harm to the significance of, or the total loss of heritage assets will only be granted in exceptional circumstances where substantial public benefits outweigh the harm or loss in accordance with the NPPF or that all of the following apply:
- i.** the nature of the heritage asset prevents all reasonable uses of the site;
 - ii.** no viable use of the heritage asset itself can be found that will enable its conservation; and,
 - iii.** conservation by grant funding or some form of charitable or public ownership is not possible; and,
 - iv.** the harm or loss is substantially outweighed by the benefit of bringing the site back into use.
- c.** The loss of a building that makes a positive contribution to a conservation area or heritage site should also be treated as substantial harm to a heritage asset.
- d.** Proposals affecting the layout, design, character, use and function of both designated and non-designated a heritage assets or its setting should conserve and enhance the significance of the asset as well as its surroundings and have regard to the following:
- i.** The conservation, or reinstatement if lost, of features that contribute to the asset or its setting. This may include original chimneys, windows and doors, boundary treatments and garden layouts, roof coverings or shop fronts. In listed buildings, internal features such as fireplaces, panelling, ceilings, doors and architraves as well as the proportion of individual rooms may also be of significance.
 - ii.** The removal of harmful alterations such as inappropriate additions, non-original windows and doors and the removal of paint or pebbledash from brickwork.
 - iii.** Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the heritage asset will not be taken into account in any decision.

- iv. Proposals should not prejudice the future restoration of designated and non-designated historic parks and gardens.
- e. Proposals to existing heritage asset buildings should seek to improve the proposals energy efficiency effectively and sensitively and without detrimental visual impact on the heritage asset, or setting of the heritage asset.

Justification.Suporting Text

- 12.5.1.** The London Plan is clear that heritage assets should be seen as an integral part of the urban fabric with a key role in place-making and contributing to economic viability, accessibility, environmental quality and social well-being.
- 12.5.2.** Heritage significance should be used positively in the planning and design process and heritage assets should be sensitively integrated with their setting with creative and innovative solutions that contribute to their significance and sense of place. The council will pay particular attention to assets on the 'at risk' register and actively seek to find viable and long-term sustainable uses that enable them to be removed from the list.
- 12.5.3.** Historic England provides detailed guidance on best practice approaches when working with heritage assets. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study also provide borough specific guidance when working with heritage assets.

Heritage assets

- 12.5.4.** Merton has a rich and varied heritage ranging from designated heritage assets of national importance (such as the remains of Merton Priory founded in 1117, a scheduled ancient monument) to the suburban heritage of the 1930's. The council has a duty to consider the significance of all these areas that are positively identified as having heritage significance when carrying out its statutory functions and through the planning system. Conservation and enhancement of heritage assets, and where appropriate, associated development, can contribute towards reinforcing local distinctiveness and character in the borough.
- 12.5.5.** Heritage assets are the valued components of the historic environment. They are defined as any building, site, place, area or landscape, positively identified as having a degree of significance meriting consideration in planning decisions. The term embraces all manner of features, whether standing, buried or submerged, whether designated or not and whether or not they are capable of designation.

Identification of heritage assets

12.5.6. The identification of a heritage asset could be through a range of means. This could include formal designation such as conservation area or listed, or locally listed building status. Buildings in a conservation area identified as having a positive contribution to its character will be considered as non-designated heritage assets in their own right. Heritage assets may also be identified the borough character study or during the development control process itself.

Types of heritage assets

12.5.7. Heritage assets (HA) covered by this policy include:

- Listed buildings (designated HA)
- Buildings in conservation areas (designated HA)
- ~~Historic~~ Registered parks and gardens (designated HA)
- ~~Local Historic Parks and Gardens (undesignated HA)~~
- Scheduled ancient monuments (designated HA)
- Archaeological Priority Areas (designated HA)
- Locally listed buildings, monuments, sites, places, areas, historic parks and gardens or other design landscape (non-designated HA)
- Any other building, monument, site, area, streetscape or landscape that is positively identified as having a degree of heritage or historic significance

Heritage statements

- 12.5.8.** Heritage statements will be required to set out how proposals conserve, enhance or restore heritage assets and where appropriate, conservation management plans should be prepared for the future maintenance and management of the asset. Special attention should be paid to the conservation or reinstatement of individual details of the asset that contribute towards its particular character, for example; chimneys, windows, doors, roof covering, boundary treatments and the individual elements of shop fronts. The loss or alteration of individual features can cause substantial harm to the significance of heritage assets.
- 12.5.9.** The level of detail provided in the heritage statement should be proportionate to the asset's importance in terms of the significance of the asset affected and the impact of the proposal. Where the proposal has a substantial impact on the significance of a heritage asset, it should be carried out by a specialist historic environment consultant.
- 12.5.10.** Where the Heritage Statement identifies the potential of archaeological remains within an archaeological priority area, an Archaeological Evaluation Report (and where necessary a field evaluation) will also be required.
- 12.5.11.** All development affecting heritage assets or their setting will need to be in accordance with the detailed guidance set out in the Historic Environment Planning Practice Guide. The guidance covers issues such as recording of information relating to heritage assets, guidance on repairs and restoration, change of use and improving energy performance etc.
- 12.5.12.** Historic England, keeps and maintains a Heritage at Risk register developers are encouraged to check the register at the earliest stage of development and for Heritage Statements.

Environmental performance of heritage assets.

- 12.5.13.** Proposals to existing heritage asset buildings should seek to improve the proposal's energy efficiency effectively and sensitively and without detrimental visual impact on the heritage asset, or setting of the heritage asset.
- 12.5.14.** As set out in Merton's Climate Strategy & Action Plan (2020), retrofitting the c86,000 homes and other buildings in Merton will be essential to enable Merton to reach net-zero carbon by 2050; and some of these buildings will be or will be located within heritage assets.
- 12.5.15.** In the past there has been tension between the requirements to improve the energy performance and reduce carbon from buildings that are or that are located within heritage assets and the need to conserve these historic assets. The council is supportive of efforts to tackle the climate emergency and will positively consider proposals for retrofitting buildings that are themselves or within heritage assets, where these proposals do not cause substantial harm to the heritage assets.

Information on heritage assets

- 12.5.16.** Details of the borough's heritage assets including conservation areas (design guidance, appraisals and management plans) as well as details of listed and locally listed buildings, Registered Parks and Gardens and Scheduled Ancient Monuments are available on the council's website: www.merton.gov.uk/planning-and-buildings/conservation-heritage

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 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.~~

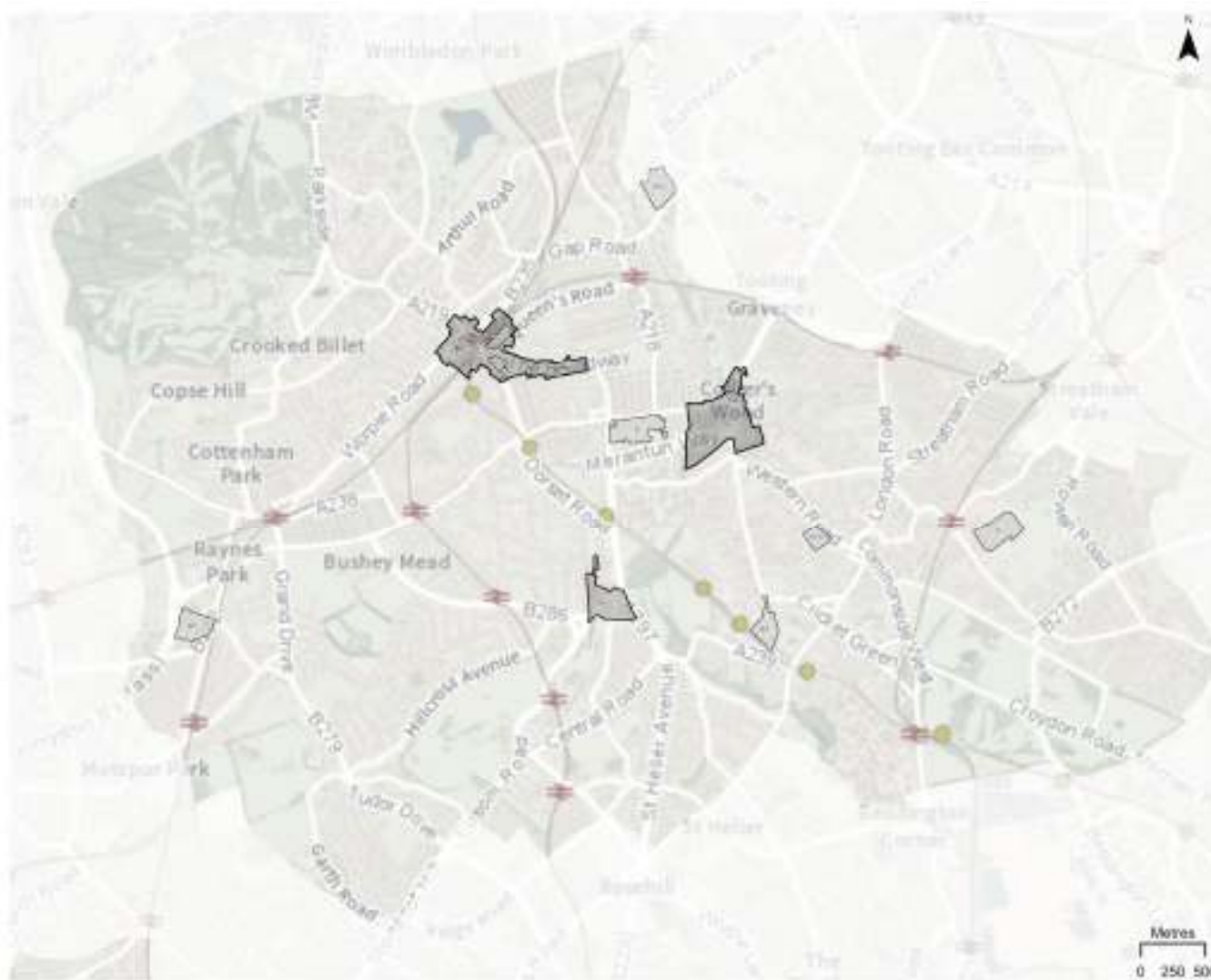
1. Tall buildings are only acceptable in the following locations:

- 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 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 in the following site allocations, CW2, Mi1, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.
2. ~~We~~The council will generally support tall buildings in those locations set out in part 1 of this policy where:
- f. 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.
 - g. They enhance the setting and/or relationship with neighbouring heritage assets.
 - h. They are of exceptional design and architectural quality.
 - i. They ~~are informed by~~ have had regard to the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.
 - j. They respond to the council's Design Review Panel, where applicable, which provides independent design scrutiny from a panel of industry experts.
 - k. They ensure the ground and lower levels are designed for a human scale and maximise the amount of active frontage and natural surveillance.
 - l. They do not impact the opportunities of neighbouring or adjoining sites, including across borough boundaries.
 - m. They are designed to mitigate against any micro climatic effects such as sun, reflection and wind, and internal spaces are designed to mitigate overheating.
 - n. They create minimal negative harm to the quality of neighbouring public spaces and open spaces.
 - o. They include high quality and useable public open space, appropriate in size and location to the building and its site characteristics.

-
- p. ~~They're an~~ An appropriate material pallet that is well detailed and safe is proposed.
 - q. They provide a mix of tenure and home sizes in accordance with ~~this Local Plan's policies~~ on Housing.
 - r. 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.
 - s. Appropriate provision for waste and bicycle storage is provided and is integrated into the overall design of the building.
 - t. Their shared spaces, such as lobbies, communal gardens and corridors are designed to enhance social cohesion and mental and physical wellbeing.
 - ~~u. They're within Wimbledon town centre, as set out in the Future Wimbledon supplementary planning document.~~
 - ~~v. They are within Morden, as set out and site allocation Mo4.~~
 - ~~w. They are within Colliers Wood, as set out within the site allocation CW2.~~
3. 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))



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



Strategic Heights Diagram, Colliers Wood Town Centre.

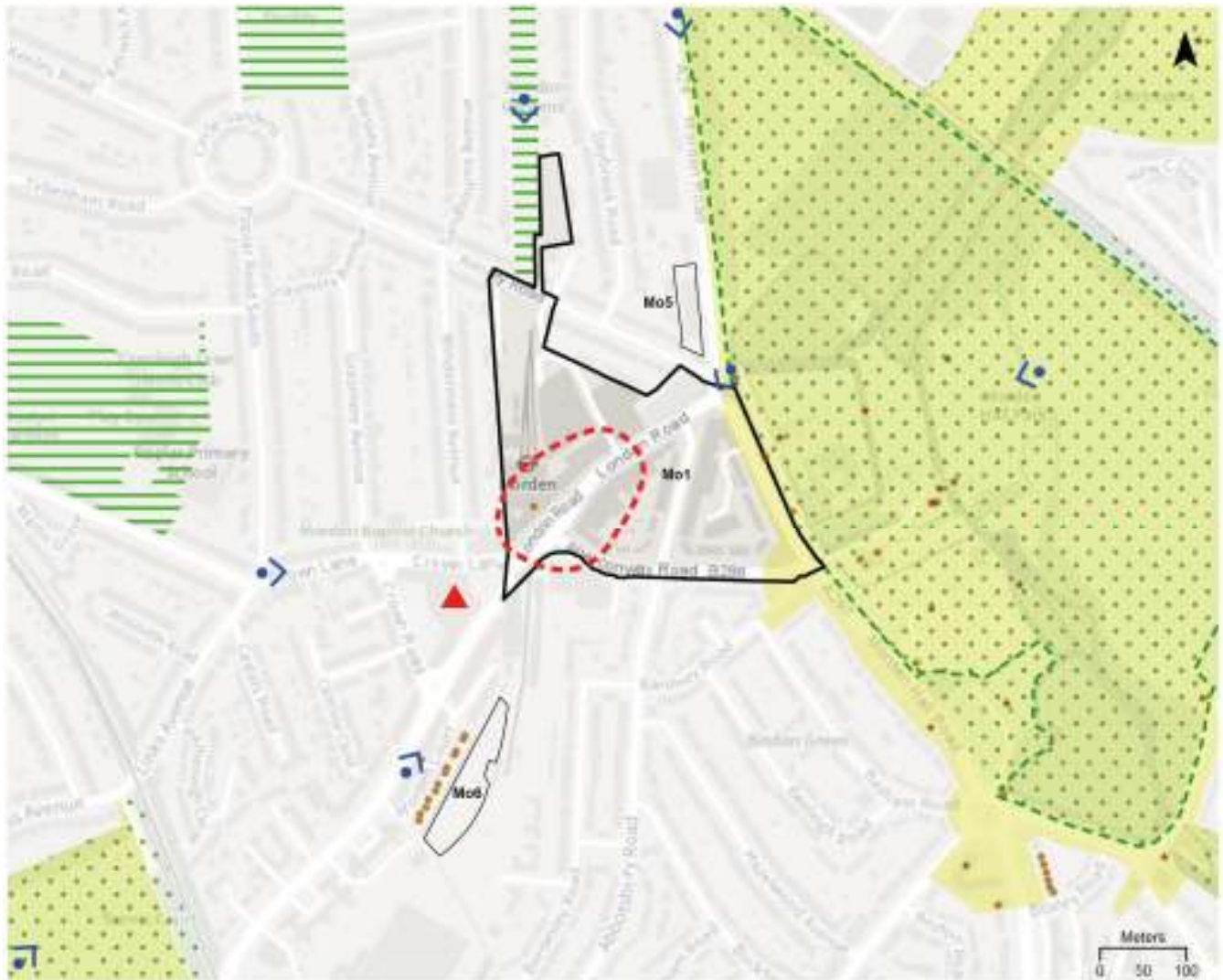


Contains OS data © Crown copyright [and database rights] (2021) OS 100019259

- | | | | |
|---|--|---|--------------------------------|
|  | Colliers Wood town centre heights range: up to 21m [approx. up to 7 storeys] |  | Estate regeneration: High Path |
|  | Indicative location of tall building cluster heights range: up to 49m [approx. up to 15 storeys] |  | Metropolitan Open Land [MOL] |
|  | Brittania 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.



Contains OS data © Crown copyright (and database rights) (2021) OS 100019299

- | | | | |
|---|---|---|------------------------------|
|  | 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.



Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)

-  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]
-  Open space
-  Conservation area
-  Registered parks and gardens
-  Listed buildings
-  Locally listed buildings



Justification-Supporting Text

- 12.6.1. 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.
- 12.6.2. 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'.
- 12.6.3. 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.
- 12.6.4. 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.
- 12.6.5. 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.
- 12.6.6. Merton's Borough Character Study gives holistic guidance on best practice design approach highlighting the importance of a sites suitability and sensitivity.
- 12.6.7. 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.
- 12.6.8. 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.

- 12.6.9.** Consideration must be given to ensure the development is inclusive for all sections of the community, in accordance with policies on Health and Wellbeing.

Policy D12.7

Advertisements

Policies on advertisements, shopfront design and signage aim to ensure these regular features of our urban environment enhance and do not detract from people's experience of the public realm in Merton.

- a. Express consent will only be granted for advertisements where they do not harm the character of an area, amenity or public safety. When assessing proposals for new advertisements, cumulative impacts will be taken into account.

- y. The council will ensure that:
 - i. The quality, character and amenity of the borough is not diluted or undermined by inappropriate or excessive advertising on buildings, in the street or on shop-fronts.
 - ii. Advertisements and signage should be designed so that their size, scale, type and illumination are unobtrusive, taking into account site context and local character.
 - iii. They do not compromise safety and security or obscure highway sightlines and allow free movement along the public highway by all users, including people with disabilities, especially the visually impaired.
 - iv. They do not adversely impact on trees on or in close proximity to the proposed site, especially those protected by Tree Protection Orders (TPOs) or within conservation areas.
 - v. Visual permeability and natural surveillance between the street and inside non-residential buildings is not compromised by internally applied artwork, blinds or advertising.

Justification.Suporting Text

12.7.1. Advertisements are a regular feature of our urban environment and, when well-designed and located sensitively, can play a positive role in creating a vibrant and interesting place. However, it is important that advertising material (including advertisements that may be considered individually acceptable) does not proliferate to an extent to undermine the appearance of individual buildings, the street or the wider public realm. The council will be vigilant in using its powers to prevent such an excess. When assessing the impact of an advertisement proposal, the cumulative impacts of advertisements on the streetscape and public realm will be taken into account.

Safety and security

12.7.2. Advertisements should not represent a safety or security hazard to pedestrians or motorists by impeding views, unduly distracting attention, creating opportunities for concealment or otherwise undermining perceptions of safety.

12.7.3. The erection of advertisements can block views and vistas along streets – important for orientation and understanding the public realm - or deflect attention inappropriately from the general townscape or important local landmarks, local established views and historic buildings and areas. Potential losses of views will be taken into consideration when determining applications. Inappropriately designed, sized or sited advertisements can detract from the visual appearance of individual buildings and the wider townscape. This can be the case in any part of the borough, but particularly sensitive are Conservation Areas, Metropolitan Open Land or the vicinity of Listed Buildings. The council will use its Discontinuance Notice Powers to remove advertisements that substantially injure local amenity and the environment.

Policy D12.8

Digital infrastructure

This policy aims to ensure digital infrastructure is deployed to support better digital connectivity across all of Merton and does not detract from a healthy environment or people's experience of the public realm.

- a. Proposals for telecommunications apparatus and equipment will be considered in accordance with International Commission guidelines and relevant Government guidance. Proposals should demonstrate that the equipment will not cause interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.
- z. Proposals will be expected to demonstrate that the equipment will meet International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines on the limitation of exposure of the general public to electromagnetic fields.
- aa. Proposals for telecommunications apparatus and equipment should be designed and located such that they do not detract from the visual quality, enjoyment and useability of the public realm or detract from the setting and context of buildings and the street scene. Proposals will be expected to:
 - i. Ensure equipment is placed to the back edge of the footway;
 - ii. Maintain an adequate width of footway consistent with its existing and likely future intensity of use;
 - iii. Group equipment in a neat and orderly fashion;
 - iv. Ensure there is not a proliferation of numerous items of infrastructure that will cumulatively adversely be detrimental to the public realm;
 - v. Construct bespoke enclosures to accommodate equipment as a means of managing the need to provide a number of items of equipment in a single location;

- vi. In particularly sensitive areas, notably where heritage assets are affected, locate equipment in underground chambers.
- vii. Ensure that the design and siting of equipment and infrastructure does not undermine the safe enjoyment of the public realm or relevant policies promoting active travel and sustainable means of travel.

Justification Supporting Text

- 12.8.1. The council recognises the benefits of up-to-date digital infrastructure industry and the needs of telecommunications companies in providing and maintaining this. This needs to be balanced with minimising the environmental impact and ensuring a high quality urban environment.
- 12.8.2. The council is therefore keen to minimise the adverse impacts on visual and environmental amenity and public safety of proposals for telecommunications, particularly in residential areas, on sensitive skylines and in other sensitive locations. Telecommunications apparatus should be sited unobtrusively and the council will have regard to all relevant development plan policies in assessment of development proposals for this apparatus.

Policy D12.9

Shop front design and signage

Policies on advertisements, shopfront design and signage aim to ensure these regular features of our urban environment enhance and do not detract from people's experience of the public realm in Merton.

- a. Proposals for new shop fronts or alteration to existing shop fronts should relate to the scale and character of the building and enhance the street scene. Proposals for alteration or removal of existing shop fronts shall:
 - i. Retain and restore quality original shop fronts where they exist, to contribute to and enhance the established character of their shopping centre or parade;
 - ii. Retain and restore original features and details where they are of historic value, contribute to the character or appearance of the building or street scene;
 - iii. Retain separate access to upper floors and create or restore such access where this is practical;
 - iv. Provide for satisfactory access for people with disabilities, special sensory and mobility needs within the building, retaining the full width of the effective footway, irrespective of ownership, keeping it free of ramps, railings or any other obstructions.
- b. Proposals for shop fascias will be expected to enhance the street scene and form an integral and appropriately proportioned part of the whole shop-front and building. They should:
 - i. Relate to the appearance, scale and character of the shop front and its associated features;
 - ii. Relate to the shopping parade within which it is located;
 - iii. Ensure the depth of fascias are consistent with neighbouring shops where they were designed as a whole and relate appropriately to the pilasters and console brackets;

- e. Shop-fronts must be of a high quality and well-proportioned and ~~designed and should be designed in accordance with the council's Shopfront Supplementary Planning Document 2017.~~
- f. Proposals for new buildings where there is a proposed retail or non-residential ground floor, must demonstrate that future shop-fronts and advertising has been planned for, and can be accommodated in the building design in a manner that does not undermine the building design and architectural integrity.

Justification.Supporting Text

- 12.9.1.** Shop-fronts have a huge impact on the appearance of individual buildings and parades of shops. Mertons Shopfront SPD provides best practice design approaches for design and should be used when designing shop fronts.
- 12.9.2.** The council recognises the importance of attractive, high quality shop-fronts in well maintained buildings in enhancing the quality of the retail and business offer in the borough's town and local centres. As a result, the council is embarking on a selective programme of shop-front enhancements and façade restorations in order to address this issue.
- 12.9.3.** Outside these areas the council has produced a Supplementary Planning Document on shop-fronts to guide applicants planning to install new shop- fronts. Applications should show that they have used this guide to inform their work.

Policy D12.10

Dwelling Conversions

This policy will ensure that dwelling conversions are of high quality standard for future occupiers and support housing choice.

- a. Proposals to convert an existing single family sized (3-bed or more) dwelling into two or more smaller units of accommodation must incorporate the re- provision of at least one family sized (3-bed or more) dwelling.
- b. Seek to minimise carbon emissions from existing buildings in accordance with ~~the chapter on climate change~~ policies on Climate Change.
- c. In accordance with policies on managing local flood risk dwelling conversions in Flood Zone 3b must ensure no increase in building footprint and no increase in the number of units or bedrooms. Proposals for the change of use or conversion to a use with a higher vulnerability will not be allowed. In Flood Zone 3a, self-contained residential basements and bedrooms at basement level are not permitted.

Justification.Supporting Text

- 12.10.1.** Local housing research demonstrates the need for all sizes of new homes in Merton, including family housing.
- 12.10.2.** The conversion of existing single homes into two or more smaller dwellings contributes to the provision of Merton's share of London's new homes. Whilst this does not normally create problems with larger houses, the conversion of single dwellings into two or more smaller homes is also prevalent in certain parts of Merton, the "gridiron" terraces of Abbey, Colliers Wood, Dundonald, Graveney, Hillside Trinity and Wimbledon Park. Loss of 3-bed+ homes in these locations reduces housing choice in these areas.
- 12.10.3.** To ensure that dwelling conversions produce new homes of a high design quality and support housing choice, all new dwellings including dwelling conversions must comply with the most appropriate minimum space standards in place at the time of the planning application. Applications for the conversion of existing family-sized single dwellings into two or more smaller units must include the re-provision of one family sized unit. As set out in London Plan 2021 paragraph 4.2.8, a family sized unit is defined as having three or more bedrooms.
- 12.10.4.** To ensure negative effects are mitigated, the council will expect any proposed conversions to retain a family sized dwelling where one previously existed. All dwelling conversions, regardless of size must rigorously apply the spaces standards in Policy D6 in the London Plan. This will ensure conversions do not take place in unsuitable dwellings that are too small, cannot provide adequate circulation and are in any other way considered sub-standard.
- 12.10.5.** In line with the London Plan, homes located on the ground floor in dwelling conversions and other forms of minor residential development should meet the requirements of Policy D7 Accessible Housing. Homes that are not on the ground floor on minor developments can comply with the M4(1) standard, which does not require step-free access, where provision of step-free access would be unfeasible.

- 12.10.6.** Often many larger (and some smaller) houses have been subdivided into self-contained flats and/or houses in multiple occupation in the past, when today's space standards did not apply. These are likely to be considered sub-standard in terms of space, circulation, access and provision for people with disabilities. Conversion, reconfiguration and extension of such properties can improve the quality of housing stock and bring it up to modern standards.
- 12.10.7.** Conversions should take account of Policy F13.9 Managing Local Flooding, to ensure that people and property are not placed at increased risk of flooding from all sources.

Policy D12.11

Basements and subterranean design

The Council will only permit basement and subterranean developments that do not cause harm to the built and natural environment, local amenity and does not result in increasing flooding (from all sources including surface water flooding) or ground instability issues. Guidance on delivering this policy can be found in Merton's basement and subterranean development supplementary planning document.

- a. All basement or subterranean development applications must be accompanied by
 - i. A Basement Impact Assessment
 - ii. A Drainage Strategy.
 - iii. An outline Construction Method Statement. The CMS is required to demonstrate that the development will be designed and constructed, to minimise its impact on the environment and neighbouring sites during construction
 - iv. Construction Traffic Management Plan to ensure that traffic and construction activity does not cause any unacceptable harm to pedestrian, cyclist, and vehicular and road safety.
- b. The development must not result in an unacceptable impact on the amenity of adjoining properties, on the natural and historic environment during and post construction.
- c. Where a basement or subterranean development is added to, or adjacent to, a listed building and all other heritage assets, it must safeguard all significant archaeological deposits and, in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where this contributes to significance.
- d. Proposal must not cause loss, damage or adverse impact to trees, shrubs, biodiversity, nature and amenity value.

- e. All basements or subterranean developments must not comprise of more than one storey and not extend beyond the outer walls of the original property (prior to alterations) to more than 50% of the original dwelling's footprint.
- f. All basements or subterranean must be appropriate to its setting and designed, have regard to the health and well-being of its occupants, provide access to natural light and ventilation.
- g. Ensure that any externally visible elements such as light wells, roof lights and fire escapes are sensitively designed and sited to avoid any harmful visual impact on neighbour or visual amenity.
- h. Basements or subterranean development must be designed to minimise the risk of internal flooding and must not increase the risk of flooding elsewhere. Proposals must include sustainable urban drainage scheme to reduce runoff rates and implement proposals to conserve and re-use water through rainwater harvesting.
- i. Developers of basement or subterranean developments are required to sign up to Considerate Constructors Scheme.
- j. No new basements or subterranean development will be permitted under the public highway.

Justification.Supporting Text

- 12.10.8.** This policy applies to all new basement or subterranean developments, including the construction or extension below the prevailing ground level of a site or property. Subterranean and other basement developments are 'development' as defined by the Town and Country Planning Act 1990 as amended. This policy focuses on the design element of basement developments.
- 12.10.9.** Basement and subterranean developments can help to make efficient use of the borough's limited developable land. However, in some cases they may have the potential to cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems or damage the character of areas and the natural environment. Therefore, limiting the size and extent of a basement will ensure that the special character of Merton is preserved and importantly, proposals do not lead to over development or inappropriate intensification of existing properties.
- 12.10.10.** Basement and subterranean developments affect the existing building, neighbouring building and neighbourhood amenities. Building Regulations and the Party Wall Act control the structural integrity of the development itself, but these regulations do not concern themselves with the impact on neighbourhood amenity of the construction process or the finished development.
- 12.10.11.** In some cases of higher potential risk, the Council may require applicants to fund an independent assessment of the basement structural assessments. This is particularly likely where proposals will affect listed buildings of high significance or with particularly sensitive historic fabric, or those in high risk locations where basements are in proximity of environmentally sensitive features, such as culverted rivers/watercourses.

Basement and subterranean Supplementary Planning Document (SPD) and the Sustainable Drainage (SUDS) SPD.

12.10.13. Merton's Basement and subterranean Supplementary Planning Document and the Sustainable Drainage (SUDS) SPDs provide further guidance on the Council's requirements for additional assessments to be submitted with a basement/subterranean planning application. Both supplementary planning documents can be found online via Merton council's website www.merton.gov.uk/planning-and-buildings/planning/supplementary-planning-documents .

Construction Method Statement (CMS)

12.10.14. The impact of basement and subterranean construction, including issues relating to noise, dust, disturbance and structural stability of surrounding properties as well as the management of traffic, plant and equipment, is a growing concern in the borough, particularly in residential streets. It can affect the quality of life, amenity and living conditions as well as traffic and parking of nearby residents and local communities. In some instances, multiple excavations in a residential street can lead to detrimental impacts during the excavation and construction processes. While planning has limited powers to control the construction processes, it does have an important role in protecting amenity and living conditions.

12.10.15. The council will seek to ensure that the amenity, living conditions and the health and wellbeing of nearby residents are protected by reducing the impacts from construction works, such as noise, vibration, soil removal and associated plant, machinery and heavy vehicles. In addition to ensure that structural stability is safeguarded at each of the development proposal, planning applications for basement developments must demonstrate how all construction work will be carried out. Guidance on CMS can be found in Merton's Basement and subterranean SPD.

Sustainability

12.10.16. The environmental impact of basement and subterranean developments is arguably greater than the equivalent above ground development due to the increased energy and resource requirements in their construction and use (e.g. heating and lighting). The council will expect all basement development proposals to demonstrate that they have sought to minimise their environmental impact in accordance sustainable design and construction and circular economy policies.

Heritage Assets, Conservation and Listed buildings

12.10.17. The impact of basement and subterranean development proposals on heritage assets must be assessed on their merits to avoid any harm to their significance or historic integrity. Listed buildings are recognised for their exceptional heritage value and once a listed building is severely damaged or demolished, that historical connection is lost forever. Basements beneath the garden of a listed building are not permitted except on larger sites where the harm to the building's structure or setting and the basement is substantially separate from the listed building, and the acceptability of such schemes will be assessed on a case by case basis.

12.10.18. The link between the listed building and the basement should be discreet and of an appropriate design and location that does not adversely impact on the significance of the listed building. In the exceptional circumstances where these are allowed, there should be no extensive modification to the foundations of the listed building or any destabilisation of the listed structure and account will be taken to the individual features of the building and its special interest.

12.10.19. Similarly, development proposals involving excavation nearby or adjacent to a listed building will be required to demonstrate that the integrity of the listed building will be unaffected. The council will consult with Historic England (this includes the Greater London Archaeology Advisory Service (GLAAS) and any other appropriate bodies regarding listed building developments

12.10.20. In conservation areas, basements should conserve or enhance the character and appearance of the conservation area. This is particularly relevant in relation to external visible features e.g. light wells and railings which may impact on the character of conservation areas. Further guidance and advice can be found in Merton's Basement and Subterranean, Design and Sustainable Drainage SPDs.



13. ECONOMY AND TOWN CENTRES

Strategic policy EC13.1

Promoting economic growth and successful high streets

1. We will support economic recovery, business investment and jobs growth through support for a diverse local economic base in Merton by encouraging developments that provide a greater number and range of jobs and services and add to the vibrancy of the borough.
2. We will focus on encouraging business investment and jobs growth to support a diverse and resilient economy based on a wide range of sectors. We will do this by:
 - a. Supporting development that raises and sustains the number and range of jobs increases the diversity of businesses and reduces carbon emissions where it meets other policies in this plan;
 - b. Considering the full economic potential of all of Merton's sectors when determining planning applications, including social and community infrastructure, industrial and waste services, business, leisure, sports, town centre services and shops, creative, cultural, tech and green sector jobs;
 - c. Promoting resource efficiency and the principles of the circular and sharing economy; supporting developments and encouraging businesses to take advantage of the new economic opportunities associated with reducing carbon emissions and transitioning to a low carbon economy. Safeguarding employment and community floorspace and sites for business and jobs, including for shared workspace;
 - d. Defining Merton's hierarchy of town centres, high streets and neighbourhood parades in Policy TC.13.3 and supporting these by encouraging a broad range of occupiers suitable for each area that support jobs and local vibrancy;
 - e. Strengthening the pathways through education and learning into jobs and careers for residents, supporting employment and training schemes to maximise local employment opportunities and help address skills deficits, including in green skills;
 - f. Encouraging employer participation and investment in skills;
 - g. Aligning the skills offer to our growth and strategic sectors through the Skills for South Londoners Strategy and the south London Skills and Employment Board; and
 - h. Requiring developers and applicants on major sites to support the recruitment of local residents and businesses as part of the construction and end life of their development.

- 3.** We will seek to ensure a supply of viable and appropriate sites and premises for businesses, jobs and other enterprises in locations which optimise the needs of business while minimising disruption to local amenity. We will do this by:
- a.** Strengthening the NPPF’s “town centre first approach” by encouraging a range of appropriate town centre uses, not limited to retail, that generate a larger number of journeys towards Wimbledon (major town centre), Colliers Wood, Mitcham and Morden (district town centres);
 - b.** Supporting local town centres and neighbourhood parades for businesses commensurate with the character of the area and providing services to local residents;
 - c.** Encouraging complementary businesses, services and activities in our town centres that will enhance the vitality and vibrancy of the centre, including uses that will add to the attraction of the town centre for all users and meet the changing needs and desires all high street users;
 - d.** Protecting and managing the designated Strategic Industrial Locations and Locally Significant Industrial Sites, ensuring that they are prioritised for industrial and distribution uses that could operate 24-hours and are not compatible with homes, schools and other sensitive uses;
 - e.** Facilitating new employment by protecting and improving scattered employment sites for small and growing businesses or community uses;
 - f.** Supporting the provision of well managed co-working space close to good public transport links;
 - g.** Seeking to ensure that there is a strong supply of appropriate space for small businesses, including move on space;
 - h.** Supporting opportunities to use vacant buildings and land for flexible and temporary meanwhile uses or pop ups;
 - i.** Supporting the redevelopment of purpose built retail units into other uses;

Justification SUPPORTING TEXT

- 13.1.1.** The NPPF ~~2019 and~~ 2021 ~~draft~~ states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 13.1.2.** The COVID-19 pandemic is having a devastating impact on the global economy, on unemployment, business closures and structural economic changes across the world. The UK, London and Merton are affected by the profound decline in jobs and rise in business closures. We are still in the pandemic phase and it is not yet known when this will end or the exact nature of the economic recovery.
- 13.1.3.** Economic and social recovery from the effects of COVID-19 will be a priority for the UK, for London and for Merton for the short to medium term. There are already a variety of predictions as to how COVID-19 will change the supply and demand for businesses and jobs. It is not yet known which of these will become a longer term reality and which might fall away as we start to recover from the impacts of the pandemic. This Local Plan continues to plan for space for businesses, jobs, apprenticeships and training in order to boost wages and local employment opportunities within the borough.
- 13.1.4.** What is known is that a global and local transition to a low carbon economy is essential to address climate change and its impacts, and will be important in Merton to achieve a net zero carbon borough by 2050. Through this Local Plan and through other initiatives we support the green recovery and the London-wide aim to tackle the climate and ecological emergencies and improve air quality by doubling the size of London's green economy by 2030 to accelerate job creation.
- 13.1.5.** Merton is characterised by being the gateway between inner and outer south west London. There is a relatively limited amount of land and floorspace available for business and jobs, relative to the space available for homes, parks and open spaces. This is why, in Merton, our plans for sustainable economic development covers all types of businesses, services and jobs from high value financial services through to restaurants, theatres and other town centre activities, manufacturing, sports, logistics, leisure, culture, schools and community uses.

13.1.6. One of the council's main aims is to be open for business and invest in the quality of life of our residents by providing suitable and well-located space for a wide variety of businesses and services that enable residents to work and run businesses locally, reducing the need for excessive commuting. This approach helps to deliver the council's objectives of supporting resilience, tackling climate change, the 20-minute neighbourhood, places for people and good growth. The Local Plan has the following five objectives:

- Tackling climate change
- Supporting resilience
- Places for people
- Good growth
- Place Plans and the 20-minute neighbourhood

13.1.7. The relationship between the number of jobs and employment floorspace is not straightforward and is becoming harder to quantify given ongoing advances in technology and changes in working practices. For example a decline in heavy manufacturing in Merton is not leading to a permanent reduction in demand for industrial premises, as growth areas such as food production, creative industries, advanced manufacturing, research and development, recycling and waste management, construction, printing and publishing and logistics are utilising such sites.

13.1.8. In 2020 Government has introduced successive statutory instruments and changes to the Use Class Order. Merton is supportive of the principle of greater flexibility in what business or community space can be used for and this may help to accelerate opportunities for new enterprises, jobs and different ways of working, thus helping with the Covid19 recovery and providing new services to residents. However we will also seek to minimise unintended harm from implementing flexible proposals that might occur to local amenity of existing businesses, residents or future users.

Industrial land

- 13.1.9.** Successive London Plans from 2004 to the current 2021 London Plan have consistently identified Merton as having low levels of industrial land relative to demand, identifying that a more restrictive approach should be adopted to the transfer of designated industrial sites to non-employment uses. This is common across all south London boroughs.
- 13.1.10.** To help support and strengthen the local economy during this time of continued uncertainty and in order to provide the borough with a strong foundation for future business growth, competition, employment and the transition to the low carbon economy, it is our intention to substantially protect and wherever possible, improve the quality of the borough's Strategic Industrial Locations, Locally Significant Industrial Sites and scattered employment sites.
- 13.1.11.** However the council wants to support established business sites that can continue to safely accommodate modern business operations in an urban setting without requiring restrictions being placed on the business to protect nearby local amenity, such as opening hours and vehicle movements. Therefore, the council has proposed some amendments to Merton's Strategic Industrial Locations and Locally Significant Industrial Areas which are set out in Policy Ec13.2 to ensure that Merton's SILs and LSIA's are fit for purpose. We will also use the "agent of change" principle, putting the onus on new, more sensitive development to address potential harm arising from its location where sensitive uses are seeking to establish themselves within or near established active business areas.
- 13.1.12.** To tackle the loss of scarce business space and reduce the potential for conflict between established business operations and new residents the council has introduced an Article 4 Direction to remove permitted development rights from offices in designated industrial areas and Wimbledon town centre that want to convert into residential use.
- 13.1.13.** Some employment uses do not provide or increase the number of job opportunities in the borough, for instance, storage facilities, particularly self-storage. The council wishes to both increase the number of employment opportunities in the borough and will support new business floorspace that provides a higher number of jobs.

Town centres and high streets

- 13.1.14.** The rapid changes in consumer behaviour, accelerated by the pandemic, are changing the nature of high streets across England. Large standard-format “big box” retail is proving less viable as consumers shop online with deliveries on the same day or within 24 hours and demand an experience to attract them to visit high streets or town centres.
- 13.1.15.** Even before COVID 19, department stores, clothes stores, electronics and other comparison goods were most at risk from these changes and it seems likely that consumer behaviour will adapt further and faster within the 15-year lifetime of this Local Plan. There is likely to be less demand for standard sized purpose-built premises which attract high rents and business rates but have not been designed to support different types of enterprises or to be subdivided into smaller units. The council will support the redevelopment of purpose-built retail units, into other uses appropriate to their location and will encourage new non-residential premises to take reasonable steps in their design to accommodate subdivision or expansion. This approach will be more cost effective in the long run for the landowner and will create viable space for start-ups and other businesses to grow, flex and change with changing demands and consumer behaviour.

Pop ups and meanwhile uses

- 13.1.16.** To create resilient, safe, diverse and vibrant town centres, high streets and other areas in Merton, we will support opportunities to use vacant buildings and land for flexible and temporary meanwhile uses or pop ups. The use of temporary buildings and spaces can help stimulate vibrancy, vitality, viability and security by creating social and economic value from vacant properties and provide services locally that reduce the need to travel. Meanwhile uses can also help to prevent blight, reduce the risk of arson, vandalism and anti-social behaviour.
- 13.1.17.** The benefits of meanwhile use also include short-term affordable accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and providing new and interesting shops, cultural and other events and spaces, which can attract longer-term business investment.
- 13.1.18.** London Plan policy HC5 supports meanwhile uses for culture and creative industries; the council believes that this should be extended more widely to encompass property guardians and any non-residential use.
- 13.1.19.** In considering these developments, the council's priorities will be:
- The enhancement or protection of local amenity in the surrounding area. This includes the vitality and viability of town centres and high streets, the business priorities for established and designated business areas and residential amenity of local neighbourhoods and scattered employment sites;
 - The provision of jobs, with emphasis on a wide range of salaries and skills and a high number of jobs; and
 - Ensuring that parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.

Boosting skills

- 13.1.20.** Planning to support well paid jobs that offer career progression and meet the needs of the future employers must be considered to ensure a sustainable economic model. Merton will work with partners, including the London Mayor and the South London Partnership to facilitate stronger links between businesses and education and training providers in South London. We will work together to ensure that the London Recovery Programme, the Green New Deal mission and the Skills Devolution programme meets the needs of Merton residents. In doing so we will identify skills needs and gaps, recognise the need to respond to changing work patterns, the rise of technology the and the demand for suitable workspace.
- 13.1.21.** Urban farming, food growing car / bike shares, clubs, last mile delivery, recycling and reuse of materials are all emerging parts of the circular and sharing economy. In line with the London Plan, we recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success. There is a gap in green skills in London and we want to support this. The sharing and circular economy enables the efficient use of space and resources while contributing to facilitating social interaction.
- 13.1.22.** Currently healthcare, education and the public sector are major employers of our residents, both within the borough and beyond its boundaries (for example at St George's and St Helier hospitals). This is expected to continue with the planned increase in housebuilding across London.
- 13.1.23.** It is recognised that the Covid19 recovery, artificial intelligence (AI) and the tech sector will generate new types of employment, working patterns and in some cases roles that currently do not exist. We want to enable this policy to support employment growth by providing flexible work space and infrastructure that will facilitate employment space
- 13.1.24.** Development trends in Merton over the past 15 years, as in other urban areas, demonstrate that live/work developments have reverted quickly to a single use and any retention of the mixed use function is unachievable. This results in a loss of either employment or residential space. However there are currently substantial changes in working practices arising from COVID19 and it is not known which of these will be permanently established. We will support purpose built live/work developments outside designated industrial areas and scattered employment sites where there is no harm caused to established businesses or residential areas. Planning obligations will be used to establish purpose-built live/work developments. The "agent of change" principle will be used to protect existing amenity.

13.1.25. We will use planning obligations to ensure that job opportunities and apprenticeships are notified to the council or appropriate nominated agencies so that suitable local people can be given the opportunity to fill these vacancies.

Policy EC13.2

Business locations in Merton

Proposals relating to employment sites will be supported where they:

- a. Retain existing employment land and floorspace. The council will support proposals for the redevelopment of vacant and underused existing employment land and floorspace for employment uses.
- b. Are well designed. All proposals for developments should:
 - i. Be flexible and adaptable to the changing needs of different types of potential users over the lifetime of the development;
 - ii. Support the transition to a low carbon economy wherever possible;
 - iii. Have layout, access, parking, landscaping and facilities that are secure and appropriate to the site and its surroundings;
 - iv. Ensure the design of non-residential space protects neighbouring amenity;
 - v. Not unacceptably affect the operation of neighbouring businesses; and,
 - vi. Not adversely affect pedestrian, cycle or traffic movement, road safety or local amenity.
- c. Have good access to public transport. Proposals for offices and business space should be easily accessible by walking and cycling and wherever possible have facilities such as showers and secure cycle parking to support this. Measures to support the Healthy Streets approach and reduce reliance on car travel such as parking restrictions, travel plans and other appropriate measures will also be required.

Offices

- d. Provide larger offices and businesses that generate a lot of trips in town centres or in areas with good access to public transport (PTAL 4 and above) and within close proximity to additional services for employees and workers;

- e. Provide small (generally floorspace below 280 sqm) offices and businesses throughout the borough;
- f. Encourage the refurbishment/ redevelopment of existing offices for office use including shared space and flexible working;
- g. Proposals relating to employment sites will be supported where they demonstrate full and proper marketing. Where planning permission is required, proposals will only be supported for the change of use on upper floors in Wimbledon town centre from office floorspace to residential if it can be demonstrated to the council's satisfaction that there is no demand for the office use. Marketing of the site will need to be demonstrated at reasonable prices for a period of 18 months (1 ½ years).

Industrial land

- h. Provide general industry and storage and distribution in Merton's Strategic Industrial Locations and Locally Significant Industrial Sites.
- i. Protect and manage the designated Strategic Industrial Locations and Locally Significant Industrial Sites. The council will ensure that these sites are prioritised for industrial and distribution uses that could operate 24-hours and are not compatible with homes, schools and other sensitive uses;

Shared workspace and flexible business space

- j. Provide shared workspace, flexible or co-working space which is well-designed and well-managed to optimise its success. Where flexible working/co-working space is proposed in conjunction with a reduction in employment floorspace on the site, the council will seek planning obligations to secure that the flexible working/co-working space will be designed and actively managed for flexible working/co-working for a period of at least two years from the date of opening.

Justification **SUPPORTING TEXT**

- 13.2.1.** The NPPF, London Plan and Merton's strategic economic development policy seeks to optimise employment opportunities for Merton's residents assisted by supporting new development of business premises and protect employment land. These policies also direct new employment opportunities to the most appropriate and sustainable locations. This policy will contribute towards delivering these policies by setting out how proposals for employment will be considered.
- 13.2.2.** Merton's main employment areas are the designated town centres and designated industrial sites (both the Strategic Industrial Locations [SILs] and Locally Significant Industrial Sites [LSIS]) as designated on Merton's Policies Map.
- 13.2.3.** Merton's town centres are highly suitable for commercial, business and services (Use Class E and F). These locations are considered the most appropriate and sustainable for these uses as they:
- are highly accessible by different forms of transport;
 - allow for the expansion of business;
 - allow for similar businesses to locate together and for neighbouring uses to be compatible with each other;
 - offer alternative complimentary services/uses to town centre visitors; and
 - support the night time and tourist economy.

Businesses and offices

- 13.2.4.** The council aims to increase the borough's capacity for attracting and accommodating a range of jobs in Merton, including offices, to increase employment opportunities and to provide good quality employment in Merton.

- 13.2.5.** The London Plan and Merton's Local Plan encourage office development in Wimbledon town centre, including large offices designed and managed for flexible working. Flexible working supports the economy, helps support collaboration and socialising while reducing the need to travel. The Mayor's London Office Review has consistently identified Wimbledon town centre as one of the few outer London locations capable of attracting office-based businesses and jobs that might otherwise have premises in central London. This is reflected in planning applications and development activity in Wimbledon to modernise existing offices and provide new speculative offices. Post COVID19, Wimbledon is well positioned to act as a hub for offices that are managed specifically for flexible working due to the town centre's excellent transport links, proximity to residential areas, opportunities for socialising and strong brand name.
- 13.2.6.** Over the past 10 years Wimbledon town centre has shown market demand for new and refurbished office development which is not evident in the rest of Merton. Wimbledon is a relatively small major centre, tightly bound by high quality residential areas with very little room for expansion. There is very limited demand for new build offices in the rest of Merton and as such Merton has a constrained office supply.
- 13.2.7.** The council will work with landowners to meet market demand for high quality, well designed offices commensurate with Wimbledon's status as a major centre with metropolitan characteristics and in recognition of Wimbledon's excellent transport links and as an internationally recognised name. Across the borough, smaller offices will be supported in town centres or in areas with good access to public transport (PTAL 3 and above).
- 13.2.8.** As stated in the NPPF and NPPG and detailed in the ~~draft~~ policy in this plan on out-of-centre commercial development, proposals for new large office developments located edge-of-centre and out-of-centre will be required to submit a sequential test and may be required to submit an impact assessment. This is to strike a balance between Merton's aspirations for economic growth whilst protecting the vitality and viability of Merton's designated town centres and minimising harm to residential areas. For the purposes of this policy, small offices are defined as being below 280sqm floorspace.
- 13.2.9.** PTAL informs geographical area levels access to public transport, the higher PTAL levels are concentrated around the town centres and transport interchanges of Wimbledon, Colliers Wood, Mitcham, Morden, and Raynes Park. Areas to the south east and south west of the borough have the lowest accessibility levels. As set out in the transport policies, applicants should use the latest and most up to date PTAL calculator from Transport for London.

- 13.2.10.** We seek to optimise employment opportunities in Merton by supporting the development of offices and directing new office space towards the most appropriate and sustainable locations. This policy will contribute towards delivering these policies by protecting offices for which there is demand. We will encourage the redevelopment/refurbishment of existing vacant offices to modernise the space for businesses. Changes to the Use Class Order in 2020 permit offices to change use (either by permitted development or prior approval) to a wide range of commercial, business and service occupiers.
- 13.2.11.** To protect space for businesses and jobs, in 2015 the council introduced an Article 4 Direction to remove these permitted development rights for offices in Wimbledon town centre and Merton's designated industrial estates to change to residential.
- 13.2.12.** In instances where planning permission is required, proposals for change of use from offices to other uses will be considered, where it can be demonstrated that there is no need for office uses. Applicants will need to provide Marketing and Vacancy evidence in accordance with the criteria set out in the Appendices, for a minimum of 18 months (1.5 years).
- 13.2.13.** Proposals for change of use from offices to alternative uses on the ground floor located in town centres should be dealt with under policies elsewhere in this plan including: Merton's town centres and neighbourhood parades. Also outside of town centres, change of use from offices to alternative uses should be in accordance with policy Ec13.3 *Protection of scattered employment sites*.

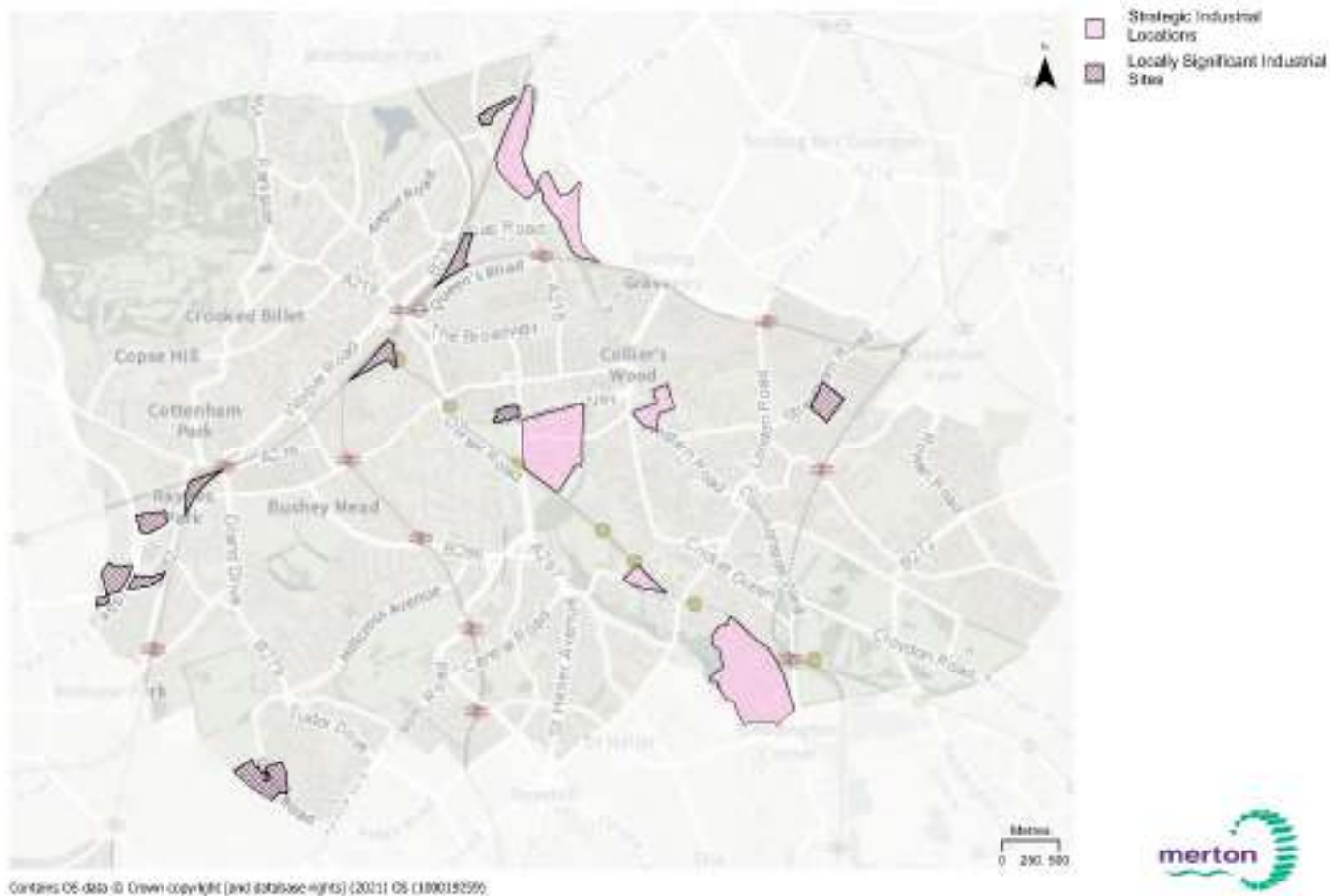
Designated business and industrial sites

- 13.2.14.** Over the past five years Merton has seen high levels of demand for space in its industrial areas from businesses that need to be close to the London economy, with very low vacancy rates and strong rental yields. Successive London Plans have recognised that industrial space in Merton and south London is limited and is in high demand.
- 13.2.15.** Merton has a wide range of key businesses that support jobs and provide services to London's population. These include food production, waste management, industrial laundrettes serving hotels and hospitals, printers, theatre stage engineering and other activities.
- 13.2.16.** What these businesses have in common is the need to operate without the restrictions that would be placed on them in more residential areas. HGV movements, additional noise and smells, early morning starts or 24 hour operations are essential operational requirements for many businesses. The council protects its designated industrial areas for these reasons and has implemented an Article 4 Direction to prevent the further conversion of offices to residential within designated industrial areas and Wimbledon town centre via prior approval in order to protect space for business uses. The council will also use its powers to ensure that established noise-generating businesses (e.g. industrial uses, rail infrastructure) remain viable and can continue to grow without unreasonable restrictions being placed on them, in line with the "Agent of Change" approach in the NPPF [2021](#) ~~2019~~ and in the London Plan.
- 13.2.17.** Merton's Strategic Industrial Locations are recorded on Merton's policies map and set out below:

Strategic Industrial Locations	Size (hectares)	Characteristics
South Wimbledon Business Area	3 2 5ha	One of the largest, most occupied strategic industrial locations in south west London with highest rental yields. Wide range of different types of industrial type businesses
Willow Lane	4 1 4ha	Large industrial area with focus on heavy industry, recycling and waste management
Durnsford Road / Weir Road	4 20ha	Range of different businesses
Plough Lane	1 4 5ha	Range of businesses

Strategic Industrial Locations	Size (hectares)	Characteristics
Hallowfield Way / Benedicts Wharf - southern half (amended)	<u>4</u> 3.2 ha	SIL area with frontage to the A24 (west of tram line) being retained as Strategic Industrial Location. Area.
Prince George's Road	6ha	Industrial area behind Colliers Wood town centre. Several trade counters

Industrial areas in Merton (new map)



- 13.2.18.** To allow for businesses to operate without excessive constraints from nearby homes (such as restrictions on opening hours, heavy vehicle movements, noise etc) the council will support proposals for manufacturing (B2 Use Class) and storage and distribution (B8 Use Class) within the designated industrial areas. Proposals for research and development light industrial or particular sui generis uses may be supported where the nature of the development requires an industrial (as opposed to a high street or scattered employment site) location and where the scheme is willing to accept restrictions on its conversion to other uses that would not be compatible with an industrial area. In line with the Agent of Change principle, the council will not support proposals in designated industrial areas that would curtail the industrial operations of existing businesses.
- 13.2.19.** In designated industrial areas in Merton, higher density trip-generating developments such as offices, shops or places of worship can interfere with the operations of surrounding businesses through increased traffic congestion, parking and pedestrian movements. Planning permission will not be granted for the development of offices in the designated industrial areas unless these are ancillary to the principle use of the premises or site.
- 13.2.20.** Logistics and other employment activities that generate frequent vehicle movements to and from the site/premises (excluding retail warehousing or any type of retail activity), will be encouraged to locate within the main industrial areas that are adjacent to the Strategic Road Network and have good vehicular access to the site.
- 13.2.21.** Proposals for new development or change of use should be compatible with the effectiveness of the SIL in accommodating the 24-hour operation of industrial type activities including the amenity of neighbouring occupiers of buildings. If proposals are likely to conflict with the successful operation of existing businesses nearby or cause harm to the amenities of occupants of neighbouring buildings without any way of mitigation, planning permission will not be granted. Mitigation measures through design conditions or planning obligations may be sought to improve site access or minimise disruption to neighbouring businesses where necessary. In line with the Agent of Change principle set out in the London Plan, the council will not support proposals in designated industrial areas that would curtail the industrial operations of existing businesses.

Shared workspace and flexible business space

- 13.2.22.** The council supports co-working and other forms of flexible working space in Merton which can support a greater number of jobs within the same office floorspace. Advice from organisations that have experience in managing co-working office and business space in London is that a number of factors are critical to its success including the location, size, presence of other ancillary facilities and the management / rental structures.
- 13.2.23.** There are many examples of flexible managed co-working spaces in London and an increase in companies such as Central Working, Workspace, Co-working and Techhub who specialise in providing this space. Managed correctly, these spaces can support a much higher number of jobs and small businesses than more traditional business floorspace. These spaces can also provide an excellent opportunity for all sizes of office-based businesses to work flexibly; reducing their rental commitments while benefitting from occasional office and meeting space as and when required. The council wants to ensure that development that proposes co-working is managed and run effectively so as to genuinely result in the extra jobs density that is cited at the planning application stage.
- 13.2.24.** Shared, flexible working and co-working business spaces are characterised by:
- Providing desks or small workspaces within a fully serviced office that can be used by individuals or businesses;
 - Monthly rents or less, making the space more affordable and flexible, rent being inclusive of services;
 - The rent is inclusive of other services such as utilities, telecoms, post, meeting spaces etc.,
 - Space for lots of people and businesses to come together, not just one or two, to create a vibrant business community and increase the chances of business collaboration;
 - No long leases or large financial commitments required to join;
 - Having a range of premises on one site or by having several sites so businesses can grow either by moving to a bigger space within the site or by moving to a flexible working area with larger premises within the same contract;

- Access to other services such as a nearby café or with a café on site;
- Having a dedicated, expert company to manage and curate the co-working offer who knows business needs and can tap into the relevant business and SME market and retain jobs, ensuring that they are being advertised and managed to maximise jobs and business retention and satisfaction;
- Being easily accessible for the individuals, businesses and clients they are trying to attract and not located in areas that will disturb residential neighbours with travel to and from the site; and
- Having a successful brand name and image commensurate to the SME / tech / creative / business market that they are trying to attract.

13.2.25. We want to ensure that proposals for flexible working are successfully delivered in Merton for the benefit of their users and that the provision of flexible working is not simply being cited at planning application stage to claim a higher jobs density when providing less employment floorspace. Therefore, where flexible working is proposed in conjunction with a reduction in employment floorspace on the site, the council will seek planning obligations to secure that the flexible working / co-working space is designed with regard to the attributes listed above and be actively managed for flexible working / co-working for a period of at least two years from the date of opening by a flexible working specialist company with a track record in this.

Policy EC13.3

Protection of scattered employment sites

Proposals that result in the loss of scattered employment sites to residential uses will be resisted except where:

- i. The site is located in a predominantly residential area and it can be demonstrated that its operation has had a significant adverse effect on local residential amenity;
- ii. The size, configuration, access arrangements and other characteristics of the site make it unsuitable and financially unviable for whole-site employment use; and
- iii. It has been demonstrated to the council's satisfaction that there is no realistic prospect of employment or community use on this site in the future. This may be demonstrated by full and proper marketing of the site at reasonable prices for a period of 18 months (1½ years).

If proposals do not meet policy requirements of E13.3 (a) (iii) above, the council will seek measures to mitigate against the loss of employment land. Such measures may include providing employment, as part of a mixed use scheme on site.

Justification SUPPORTING TEXT

- 13.3.1.** Employment sites outside the designated town centres and designated employment areas (i.e. those not shown on the Policies Map) are referred to as ‘scattered employment sites’. For the purposes of this policy, ‘employment’ and business refers to premises or land that operates within the Use Classes E(g), B2 and B8 under the Town and Country Planning Use Classes Order (as amended). ‘Community’ uses refer to premises or land that operates within the use class E(e-f) and F1 . It is intended for Policy E13.3 to protect other uses located on scattered employment sites such as leisure and entertainment E(d) and F2(c) and uses identified as sui generis uses where appropriate.
- 13.3.2.** The NPPF ~~2021~~ ~~2019~~ paragraphs 8, 20 and ~~810-912~~, the London Plan and Merton’s strategic policy on economic development all seek to optimise job opportunities for Merton’s residents by supporting the development of employment uses to the most appropriate locations. This policy aims to deliver economic growth by setting out a detailed approach to the protection of employment land for which there is need.
- 13.3.3.** Business, commercial, service and local community uses will be supported on scattered employment sites throughout Merton. Employment on scattered employment sites contributes towards Merton’s existing and growing diverse economy.
- 13.3.4.** There is constant pressure on scattered employment sites to be redeveloped for residential uses that will bring high values to the developer. Throughout the years, Merton has completed a number of viability studies to support our policies. These studies demonstrate that in Merton over the past 15 years, residential uses have a significantly higher land value, than other land uses. Therefore the ‘hope value’ that speculative developers can pay for such sites in the expectation of planning permission for housing displaces existing jobs as well as outbidding potential investors in premises for business and community uses.
- 13.3.5.** A delicate balance needs to be struck between delivering new homes and business/job growth. Based on Merton’s characteristics, a sustainable future for the borough relies on maximising opportunities for employment and local businesses, in some cases by prioritising business and jobs over high value alternative uses. Without this approach, Merton would not be able to support a diverse local economy and promote a commercially viable, thriving mix of employment, which increases jobs and services to local people in line with the NPPF. Scattered employment sites are valuable to local communities in providing services and local jobs whilst reducing the need to travel, helping create and maintain a robust local economy and achieving sustainable, mixed use communities.

-
- 13.3.6.** However, where the employment use is not compatible with a residential environment because of noise, smell or other pollutants then the council will encourage redevelopment to community or other employment uses that do not harm the amenity of residential neighbours. The appropriateness and lack of financial viability of the site for employment and community purposes have to be demonstrated before the loss of employment land to residential will be permitted. Proposals for sui generis use on scattered employment sites, not least because by their nature, must be treated on their individual merits and considered on a site-by-site basis.
- 13.3.7.** In these instances, the applicant would need to demonstrate, to the council's satisfaction, that they have undertaken full and proper marketing of the site as well as evidence that the site is no longer appropriate to accommodate employment or community uses. To demonstrate that full and proper marketing has been undertaken to justify that the employment and community uses are no longer viable, the council requires the applicant to provide Marketing and Vacancy evidence in accordance with the criteria set out in the Appendices, for a minimum of ~~30-18~~ months (21.5 years).
- 13.3.8.** If proposals do not meet the terms of this policy, the council may also seek measures to mitigate against the loss of employment or community use.
- 13.3.9.** In circumstances where proposals for mixed use development are considered, proposals must be designed to ensure the future occupation and function of employment uses, upon completion. The premises/sites retained for employment uses must:
- a.** Be of an attractive size and character for occupation by employment and community uses and flexible to accommodate alternative uses;
 - b.** Be compatible with the character and appearance of the area;
 - c.** Be designed to accommodate the proposed use (and other uses);
 - d.** Not be harmed by way of noise, disturbance, loss of light or privacy;
 - e.** Allow adequate safe vehicle access to and from the highway, prioritise access by active travel and public transport, provide adequate high quality cycle parking and minimise car parking in accordance with London Plan standards.
 - f.** The site must be built out in full before proposals for change of use from employment to alternative uses will be considered by the council.

13.3.10. We may require other measures to support the local economy. Such measures may include the applicant providing alternative sites for employment use and community uses for which there is need, (for instance ‘land swaps’) or providing equivalent employment in jobs or floorspace, as part of a mixed use scheme on-site.

Policy EC.13.4

Local Employment Opportunities

- a. Merton want to ensure that residents and local businesses are supported within the borough through local employment, business retention and inward investment opportunities which will lead to greater local economic growth and the transition to the low carbon economy. This can be achieved in part, by enabling skills, jobs creation, the circular economy and local procurement during new development.
- b. With this in mind the council will:
 - i. Work with developers to increase skills and employment opportunities in Merton by requiring all major development to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. Opportunities for employment and skills training will be considered by means of planning obligations for major developments:
 - residential developments of 10 homes or more
 - non-residential developments exceeding 1,000m².
- c. Will seek to secure a minimum of 10% of the total jobs created by the construction of new development and 20% end use job opportunities and apprenticeships to be advertised exclusively to local residents through the council's economic development officer or appropriate nominated agencies for a minimum period so that local people can be given the opportunity to fill these vacancies. A local employment strategy may be required will for very large development schemes.
- d. Work with local training providers to aim to ensure that local residents are given access to the right skills training so that they can take advantage of opportunities created by new development and help address skills deficits in the local population.
- e. Require the local employment strategy for major developments to cover procedures to ensure small and medium sized local enterprises have access to supply chain tender opportunities for the procurement of goods and services generated by the development both during and after construction, having regard to the council's Local Procurement Code of Practice.
- f. Demonstrate good practice when procuring its own goods and services by following the Public Services (Social Value) Act through Merton's Social Value Toolkit.

Justification **SUPPORTING TEXT**

- 13.4.1.** We seek to maximise employment, business and other economic development opportunities for Merton's residents and supporting the transition to a low carbon economy. This policy will contribute towards addressing the climate emergency and delivering these policies by encouraging major developments to contribute towards increasing employment opportunities in Merton.
- 13.4.2.** In accordance with the London Plan, we are committed to training, work placements and apprenticeships and views them as being a sustainable way to improve employment prospects for local people, particularly those to deliver low carbon skills. The council is determined to ensure that the use of S106 obligations helps to secure placements for local people both during the construction phase of building projects and in the resultant end use.
- 13.4.3.** Merton is a relatively affluent borough and overall, Merton is one of the less deprived areas in the country. However parts of the borough have pockets of deprivation, higher rates of unemployment and lower levels of skills/qualifications. We want to address this imbalance by providing employment opportunities for all residents.
- 13.4.4.** Reducing deprivation, sourcing local labour and reducing the need to travel is a fundamental part of creating sustainable communities.
- 13.4.5.** The Mayor's London Plan requires strategic development to support local employment, skills and training including those that support low carbon jobs and skills. Strategic developments are those defined as the schemes of over 150 homes for residential use and development over 15,000 sqm for commercial uses. However Merton is a small borough and it is highlighted in the Authorities Monitoring Reports throughout the years that Merton rarely sees development of this quantum and size. Therefore to increase employment opportunities for Merton's residents and for new developments to benefit the whole community, this policy proposes that major schemes contribute towards increasing residents' employment opportunities and skills, where viable. For this policy, major developments include proposals for:
- Residential development comprising of 10 homes or more;
 - Commercial developments where the floor space is 1,000 square metres or more.

- 13.4.6.** 'Other opportunities' includes applicants procuring local companies in the supply-chain and may include offering local residents apprenticeships or work experience to improve skills. Apprenticeships/ work experience opportunities would be particularly relevant for the larger major developments.
- 13.4.7.** For applicants to demonstrate to the council that they have met this policy, applicants should advertise employment and business procurement opportunities including jobs, work experience and apprenticeships for residents for a reasonable length of time agreed with the council's economic development officer or appropriate nominated agencies.
- 13.4.8.** We currently work in partnership with a number of agencies to secure places for apprenticeships and other employment opportunities throughout Merton.
- 13.4.9.** For larger major schemes, planning conditions may be used to require the submission of a local employment strategy. This local employment strategy should outline measures to demonstrate that training and employment opportunities could be accessed by local people during the construction phase and resultant end-use of the scheme.
- 13.4.10.** We realise that it may not be feasible for all major schemes to meet this policy requirement particularly developments that are close to the size thresholds detailed above. In circumstances where applicants, due to feasibility issues, find it difficult to meet this policy, this would need to be demonstrated to the council.
- 13.4.11.** We wish to encourage use of existing local businesses to support new development and will do this by encouraging local supply chain procurement. Not only does this support local businesses it also has an environmental and social benefit for businesses and residents.
- 13.4.12.** Our Social Value Toolkit has been designed to help council officers along with providers of council goods and services to understand what Social Value is in order to comply with legislation and be able to practically consider and achieve Social Value from commissioning and procurement activities. In doing so, we can help achieve positive outcomes and value for the Borough through the contracts we procure.

Policy TC 13.5

Merton's town centres and neighbourhood parades

This policy contributes towards maintaining and enhancing the attractiveness of town centres by encouraging more people to use these locations and promote a sharing and circular economy wherever possible. To maintain and improve the overall vitality and viability of Merton's town centres, the council will support new development in Merton's town centres and neighbourhood parades commensurate with their scale and function, providing it respects or improves the character and local environment.

All frontages in Merton's town centres and neighbourhood parades.

Supporting proposals for developments where:

- i. The proposed use is compatible with a shopping frontage and provides a direct service to the general public;
- ii. The proposal will result in an active street frontage;
- iii. The vitality and viability of the town centre or neighbourhood parade is not likely to be significantly harmed;
- iv. A window display is provided; and
- v. No significant adverse effects on the amenities of nearby residents, road safety, car parking or traffic flows would result from the proposal.

Within Wimbledon, Colliers Wood, Mitcham and Morden town centres

a. In addition to (a), supporting proposals for developments that:

- i. Provide a range of commercial unit sizes;
- ii. Provide a wide range of town centre type uses which contribute towards the vitality and viability of town centres including shopping, leisure, entertainment, cultural, community and offices.

Within Local town centres

a. Supporting proposals:

- i. for development up to 1,000sqm per unit of floorspace for town centre type uses in the designated local town centre centres of Arthur Road, Motspur Park, North Mitcham, Raynes Park and South Wimbledon. The council will resist major increases (above 1,000sqm) in town centre type use floorspace in local centres unless it contributes to the council's regeneration objectives.
- ii. that do not amalgamate existing ground floor shopping frontages in Wimbledon Village local centre so as to result in a large unit (with a floorspace of 280sqm or more).

Within Neighbourhood parades

- a. Maintaining neighbourhood parades to provide convenience shopping and other services within walking distance of local residents. Large increases in commercial floorspace in neighbourhood parades will be resisted

Justification **SUPPORTING TEXT**

- 13.5.1.** The council aims to maintain, enhance and protect Merton's town centres as focal points for residents and visitors that provide civic, retail and other commercial services and facilities. Policy TC13.5 contributes towards delivering this by setting out how proposals relating to the scale and function of proposed development in Merton's town centres and neighbourhood parades will be considered.
- 13.5.2.** The location of similar businesses, such as shops, cafes, restaurants, theatres and cinemas together makes town centres more attractive and sociable, increasing the footfall which helps support businesses and helps to create an identity and a sense of place for the community. The NPPF ~~2019~~ (and 2021 ~~consultation draft~~) makes clear that local authorities should ~~definte~~ define the extent of the Primary Shopping Area and the town centre boundary. These are available on Merton's Policies Map for each town centre.
- 13.5.3.** As detailed in the London Plan, the definition of town centres includes major, district and local centres. This term will be used throughout this document to provide policies or guidance that is relevant to all of these types of town centres. The boundaries of these centres and neighbourhood parades are shown on Merton's Policies Map.
- 13.5.4.** The NPPF ~~2021~~ 2019 and associated NPPG promotes the vitality and viability of town centres. These provide a sense of place for Merton's residents and are important areas for communities. The aim is to focus a wide range of shops, leisure and similar trip-generating uses to locate in Merton's town centres, to encourage people to use our town centres to socialise, to shop and to support local businesses and jobs. However growth needs to be considered alongside the need to conserve the local heritage and character, as well as providing a focus for community and civic activity.
- 13.5.5.** Due to changes in consumer behaviour including the increase of on-line shopping and home shopping, town centres are no longer only retail-focused but provide a social environment for residents, workers and visitors to meet and visit. Pre Covid19 our evidence showed that vacancies in Merton's town centres were lower than both the regional and national average, and over the next 10 years the council wants to ensure that Merton's town centre premises remain occupied and the town centres continue to thrive.
- 13.5.6.** In order to ensure that Merton's town centres remain a focal point for social activity, providing services and facilities as well as employment to residents and attract visitors, the council proposes that Merton's shop front designations are more flexible to deal with changes to the economy and shopping habits.

- 13.5.7.** To ensure Merton's town centres can continue to offer an attractive environment for its users and remain relevant and vibrant to respond to changing consumer behaviour, the council will permit commercial, business, services, local community and learning activities (use classes E and F) cinemas, concert halls, pubs and bars, nightclubs, tourist hostels, theatres, laundrettes and taxi services (sui generis use class). This is to ensure that Merton's residents and workers can meet and enjoy activities with friends and family. These uses would also attract visitors to the area. The proposed use will need to have an active frontage and applicants should use Merton's shop front supplementary planning guidance 2017 to enable high quality design, regardless of the nature of the interior of the premises.
- 13.5.8.** Betting shops and hot food takeaways (use identified as sui generis), are not compatible with the main retail or social function of the town centres and thus are not considered appropriate new uses outside of the primary shopping area.
- 13.5.9.** Changes to the Use Class Order in 2020 support greater flexibility (either by permitted development or prior approval) to a wide range of commercial, business and services, local community and education. We are supportive of the principle of greater flexibility in what business or community space can be used for and may help to accelerate opportunities for new enterprises, jobs and different ways of working, thus helping with the Covid19 recovery and providing new services to residents. However we also want to avoid unintended consequences of greater flexibility, such as the loss of small shops or other vital businesses that provide local services and support a thriving town centre.
- 13.5.10.** We will support development in Merton's town centres and neighbourhood parades commensurate with their scale and function and where it respects or improves the character and local environment of the area.
- 13.5.11.** Merton's town centres and neighbourhood parades provide shops and services that meet different needs of residents. But these town centres and neighbourhood parades also have different characteristics and levels of capacity to grow in the future. The council encourages shops and services, cafes, restaurants, leisure and entertainment facilities, offices and community uses to locate in Merton and will support growth that is appropriate to designated town centres, neighbourhood parades and the surrounding area. This will also ensure that development that attracts a large number of trips is located in places which are accessible by a range of transport choices.

Merton’s major and district town centres

13.5.12. Merton’s town centres have the following designations; the boundaries of these designations are in the Policies Map.

Merton’s town centres	Designations
Wimbledon	Major town centre
Colliers Wood; Mitcham; Morden	District town centre
Arthur Road; Motspur Park; North Mitcham; Raynes Park; South Wimbledon; Wimbledon Village	Local town centre

13.5.13. Attractive to residents, tourists, businesses and their staff, as Merton’s major town centre, Wimbledon has a variety of shops, services, cafes, restaurants, cinemas, theatres and offices. By capitalising on Wimbledon’s international and national reputation for quality, the council hopes to further enhance the character and vibrancy of the area to create a sense of place and ensure that there is continual activity throughout the day and at the weekend for residents, workers and visitors whilst protecting its heritage assets. The FutureWimbledon supplementary planning document should be used to guide development proposals in Wimbledon.

13.5.14. As district centres, Colliers Wood, Mitcham and Morden provide shops, services, cafes/restaurants and local businesses to meet the everyday needs of the local community.

13.5.15. Colliers Wood’s retail offer is on a par with many major centres in London. Over the past 10 years the enhancement through Connecting Colliers Wood, redevelopment of the Tower and enhancement of the town centre offer with restaurants, cafes, a new library and other services has created a far greater diversity of offer to its visitors.

- 13.5.16.** Mitcham has a unique cultural identity and character, reinforced through Rediscover Mitcham, and supports a daily street market which operates in the main shopping area of Mitcham. Merton's Civic Centre and local businesses generally serving day-to-day needs' are located in Morden.
- 13.5.17.** Morden sees higher footfall passing through the centre than other town centres of its size, as people connect between the buses, underground, car parking and nearby train and tram. In terms of the type of shops and services provided, recent consultation undertaken has clarified that Morden does not currently have the types of uses that its residents are looking for. Through the regeneration of Morden town centre, a greater range of shops and other town centre and leisure uses such as cafes and restaurants, will be provided alongside a significant amount of new and affordable housing and substantial improvements to the public realm. Morden will retain its designation as a district centre, with no overall increase to the scale of retail space provided.
- 13.5.18.** Wimbledon, Colliers Wood, Mitcham, and Morden are suitable for a wide range of commercial units sizes. To avoid adverse impacts on existing centres, town centre floorspace over 1,000 square metres will not be supported outside Wimbledon, Colliers Wood, Mitcham and Morden. Small units will be welcomed, particularly in Wimbledon and Colliers Wood, where smaller units will help to attract and retain a diverse town centre offer and give more options to independents and start-ups.

Local Centres

- 13.5.19.** Arthur Road, Motspur Park, North Mitcham, Raynes Park, South Wimbledon and Wimbledon Village are designated as local centres. Except for Wimbledon Village, these local centres provide shops and services to meet the everyday needs of the local community and are places for small and local business. These local centres serve small catchments and are within walking distance of local residents.
- 13.5.20.** South Wimbledon is a newly proposed Local Centre in this Local Plan with specific details available in policy N7.1.

- 13.5.21.** Wimbledon Village has more of a niche/specialist role and a unique character. To retain and reinforce its character and offer, it is considered that the amalgamation of existing ground floor unit frontages facing Wimbledon High Street, Church Road and Ridgway that would result in a large unit (with a gross floorspace of 280 sqm or more) would be inappropriate, having regard to the existing scale and character of the area. Merton's Annual Shopping Survey shows that the average ground floor unit size of existing town centre types uses in Wimbledon Village is less than 100sqm gross floorspace, thus the amalgamation of existing units that would result in a ground floorspace over 280 sqm would be quite large for this area. While amalgamation of unit frontages would be inappropriate, use of upper floors within the same frontage or use of the rear of the premises may be acceptable to deliver town centre type uses above 280sqm.
- 13.5.22.** Local centres complement Merton's main town centres, providing local services and enhances the area's character. Development that provides a major increase (over 1,000 sqm) of town centre type uses will not be supported in the local centres of Arthur Road, Motspur Park, North Mitcham, Raynes Park South Wimbledon and Wimbledon Village unless it contributes to the council's regeneration objectives.

Small commercial units

- 13.5.23.** The availability of small units provides improved choice for business location and affordability. In turn, having a variety of businesses provides choice for consumers and this contributes significantly towards maintaining and enhancing the attractiveness and viability of Merton's town centres. Small units are often more affordable, thereby encouraging more specialist or independent retailers.
- 13.5.24.** The need to maintain and to provide additional small units is particularly relevant to supporting business retention and diversity in Wimbledon town centre, Colliers Wood, South Wimbledon and Wimbledon Village.
- 13.5.25.** For retail proposals, Merton's definition of small, large and major developments refers to net floorspace. For all other town centre type uses the definition of small, large and major developments refer to gross floorspace.

Other frontages within town centres

- 13.5.26.** All town centre development proposals must have active street frontages to contribute towards their vibrancy and to promote a positive identity within Merton's town centre. Activities should complement each other and the centre and should be of a use, design and scale proportionate to the area.

Vacancies in frontages in town centres

13.5.27. In town centres temporary planning permission may be granted for meanwhile and temporary uses vacant shopping frontages until these units are re-occupied by uses that are appropriate to that retail frontage. Temporary Planning Permission will be considered based on the proposal(s) put forward. These proposals must complement surrounding uses in the area and must not harm nearby business and residential amenity.

Neighbourhood parades

13.5.28. To meet the day-to-day needs of local communities and to reduce the need to travel, essential local shops such as small supermarkets, pharmacies and post offices should be retained within 5 minutes' walk (400 metres) of residential areas.

13.5.29. Neighbourhood parades, located throughout the borough, have been designated to ensure that residents and workers continue to have access to a range of important local shops available for their day-to-day needs, which are easily accessible to people without a car or with restricted mobility. An unintended consequence of the greater flexibility afforded by government's 2020 changes to the use class order could be the loss of such small shops to other non-retail uses where these lie within a kilometre of another shop. Merton is a fairly compact borough, less than 5km wide in places, and we want to retain small shops and services within walking distance of its residents.

13.5.30. Neighbourhood parades complement the local shopping facilities provided in Merton's town and local centres and ensure that local convenience shopping facilities are within 5 minutes' walk (400 metres) of residential areas in Merton.

13.5.31. Neighbourhood parades are identified to ensure that local shopping facilities are retained within walking distance of residents to meet their day-to-day needs.

13.5.32. To ensure that convenience shops are retained, local research supports a minimum of 30% of units in a designated neighbourhood parade to remain in retail use taking into account unimplemented planning permissions for changes of use.

13.5.33. When a change of use is proposed, the new use must provide a local service, such as shops, small offices, estate agents or banks restaurant, cafe pub, bars and health, indoor sports and community uses (e.g. a crèche) which:

- a. supports the vitality of the parade;

- b. provides a window display; and,
- c. has no significant adverse effects on the amenities of residents, other businesses, road safety or traffic flows.

Neighbourhood parades in Merton

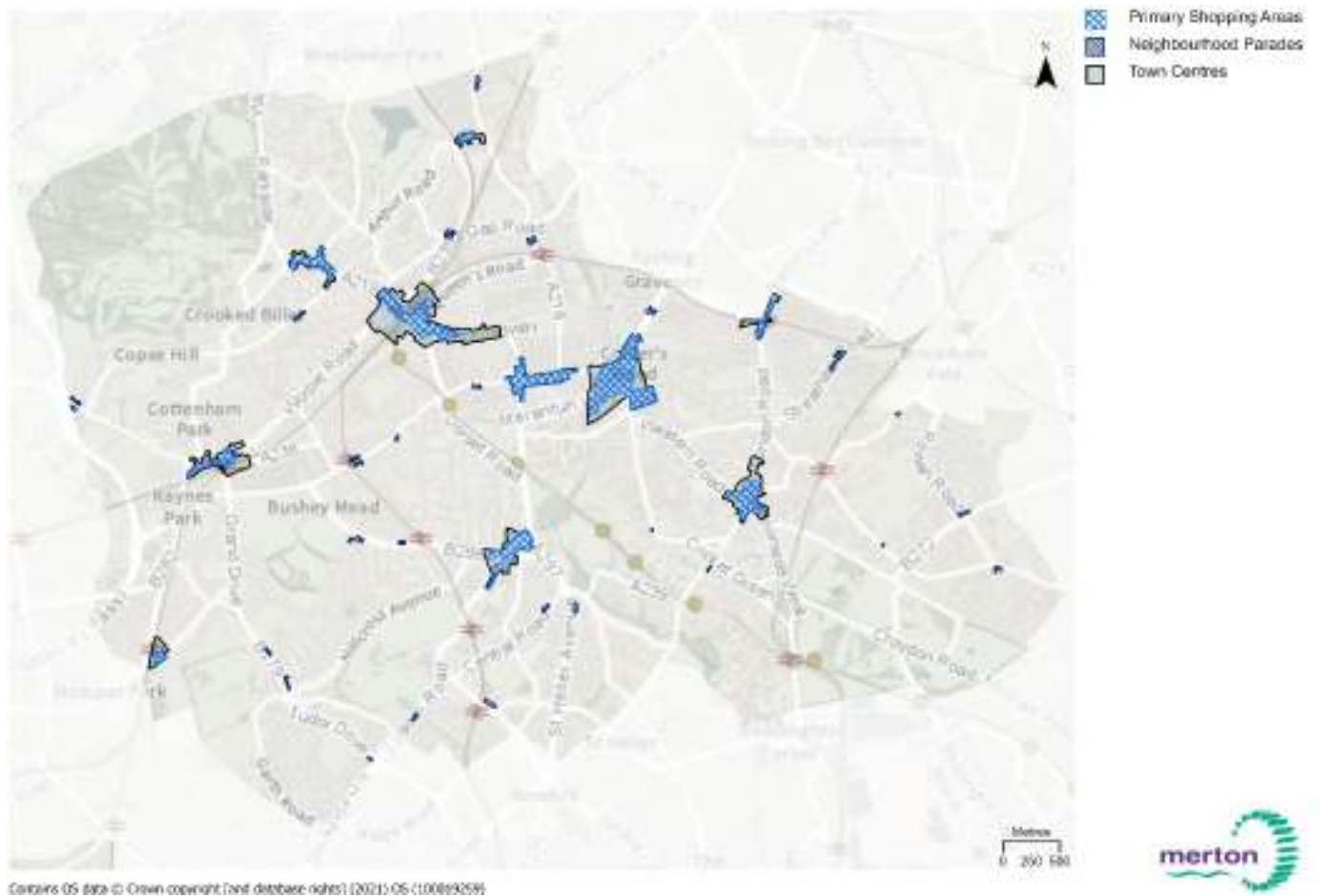
Parade Name	Units
Cannon Hill Lane and Martin Way; 141-145 Cannon Hill Lane and 244- 262 Martin Way (Cannon Hill Ward)	17
Central Road: 44a – 60 Central Road, Morden (St. Helier Ward)	8
Chestnut Grove and South Lodge Avenue; 158-174 Chestnut Grove, Pollards Hill and 10-32 South Lodge Avenue, Pollards Hill (Pollards Hill ward)	14-15
Church Road: 55-59 Church Road, Mitcham (Cricket Green)	3
Coombe Lane, West Wimbledon; 253 – 271 Coombe Lane, Raynes Park and 348-364 Coombe Lane, Raynes Park (Raynes Park and Village wards)	17
Durnsford Road: 373-413 Durnsford Road, SW19, north of Arthur Road town centre (Wimbledon Park ward)	23
Epsom Road: 41b-53 Epsom Road, Morden (St.Helier ward)	12-7
Grand Drive (north): 244A – 264A Grand Drive, Morden (Lower Morden ward)	9
Grand Drive: 300-372 Grand Drive, Lower Morden (Lower Morden ward)	14
Green Lane: 99-137a Green Lane, St. Helier (St. Helier ward)	18
Grove Road: 36-378 Grove Road, Mitcham (Longthornton ward)	7
Haydons Road: 284-298 Haydons Road and 319 – 335 Haydons Road, South Wimbledon (Wimbledon Park ward)	16
High Street: 29 -43 High Street and 46 – 72 High Street, Colliers Wood (Colliers Wood ward)	18
Kingston Road: 92 - 112 Kingston Road (Abbey ward)	14-11
Leopold Road; 1-27 Leopold Road, 2a – 32 Leopold Road <u>and 1a Strathern Road</u> SW19 (Wimbledon Park and Hillside wards)	26-31
London Road, Mitcham 323 – 337 London Road CR4	10
Manor Road and Northborough Road; 211-219 Manor Road and 291a – 307 Northborough Road, Pollards Hill, Mitcham (Longthornton ward)	17-14

Parade Name	Units
Martin Way: 43-55 Martin Way, Morden (Cannon Hill ward)	7
The Rush: 1-12 (cons) Merton Park Parade (The Rush), near Wimbledon Chase (Merton Park ward)	12
Ridgway: 65-89 Ridgway, SW19, Wimbledon (Hillside ward)	11
St. Helier Avenue: 41-67 St.Helier Avenue (Ravensbury ward)	14
Streatham Road; 172b - 196 – 172B Streatham Road and 173 – 221 Streatham Road, Streatham (Graveney ward)	31
Tamworth Lane: 299- 301 Tamworth Lane Mitcham (Longthornton ward)	2
Tudor Drive: 11-27 Tudor Drive, Morden (Lower Morden ward)	7
Wimbledon Chase: 288 – 312 Kingston Road and 1A (Rothsey Avenue) – 353 Kingston Road, Wimbledon Chase (Merton Park ward)	20

Active street frontages

13.5.34. Active street frontages contribute significantly to the vibrancy, sense of place and safety of town centres. Allowing people to access and view inside and outside of the buildings provides natural surveillance, activity and contributes towards the vibrancy of town centres. Shopfronts should provide clear visibility between the inside of the premises and the street. Conditions may be placed on planning applications to ensure that proposals do not result in dead frontages, for instance, restricting internal advertising. Applicants should use [Merton's supplementary planning document on Shop Fronts \(2017\)](#) to enable the high quality design of shopfronts, regardless of the internal use.

Town centres, primary shopping areas and neighbourhood parades in Merton (new map)



Policy TC 13.6

Development of town centre type uses outside town centres

To maintain and enhance the vitality and viability of Merton's town centres, proposals for the development of town centre type uses 'edge-of-centre' and 'out-of-centre' will be permitted only where it can be demonstrated that:

The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment submitted is proportionate to the scale of the development proposed and satisfies the council's requirements.

Local convenience development outside town centres meets all of the following criteria:

- i. The proposal will be a replacement for an existing convenience shop; or,
- ii. The proposal will meet local needs in an area identified as deficient in local convenience shopping (including convenience retail activity in petrol stations); and
- iii. The overall floorspace of the local convenience shop (including petrol stations) would not exceed 280 sqm net retail floorspace.

Vitality and viability of Merton's existing town centres would not be harmed. Planning conditions may be imposed on applications, to ensure that proposals do not have an adverse impact on the vitality and viability of existing town centres. Such conditions may:

- iv. Prevent the amalgamation of small units to create large out-of-centre units;
- v. Limit internal development to specify the maximum amount of floorspace permitted; or,
- vi. Control the type of goods sold or type of activity.

Justification **SUPPORTING TEXT**

- 13.6.1.** This policy will contribute towards delivering the “town centre first” approach set out in the NPPF ~~2021 2019~~ (paras ~~86 0-91 0~~), planning practice guidance and the London Plan by setting how proposals for town centre type uses outside of Merton’s town centres will be considered. In developing this proposal, the 2020 use class order changes have also been considered.
- 13.6.2.** The NPPF ~~2021 2019~~ and the London Plan support the “town centres first” approach: focusing growth of retail and leisure activities, businesses and other town centre type uses within town centres. This helps create an attractive destination, increasing footfall with advantages for both businesses and consumers and also creates a sense of place for Merton’s residents. This also reduces the need for residents, workers and tourists to travel to a variety of different places to access shops, services and activities.
- 13.6.3.** As Merton is one of the smaller boroughs in London, proposals for new town centre type uses located at the edge-of-centre and out-of-centre, will need to demonstrate that the sequential approach has been appropriately applied. In line with national guidance for retail developments, edge-of-centre is defined as being within 300 metres from the Primary Shopping Area.
- 13.6.4.** As set out in the NPPF ~~2019 (and the 2021 draft)~~ the Primary Shopping Area is where the council would expect to see a large concentration of convenience, comparison and service retail shops (E Use Class) to locate. For all other town centre type uses, edge-of-centre is defined as being within 300 metres from the town centre boundary. For office development this includes locations outside the town centre but within 500 metres of a public transport interchange.
- 13.6.5.** Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area exceeds 280sqm. In accordance with the ~~National Planning Policy Framework 2019~~ (NPPF 2021 paragraph 90), impact assessments will be required for leisure and office development above 2,500 sqm located outside town centres and not in accordance with the development plan.
- 13.6.6.** Applicants are encouraged to contact the council at the early stages of the application process to discuss the scope of the sequential test and impact assessment required.

- 13.6.7.** Where planning permission is required, we are continuing with the approach to protect small (c280sqm or smaller) food and convenience shops within 5 minutes' walk (400m) of residential areas to reduce the need to travel and support residents' day-to-day needs, complimenting the offer in town centres.
- 13.6.8.** There is a decline in the number of petrol stations nationally and regionally, due to increasing competition between multiple and more independent retailers. Although the council seeks to encourage more sustainable methods of travelling other than the private car, it is recognised that some residents in Merton rely on private vehicles as their preferred mode of transport. Rather than residents in Merton travelling to neighbouring boroughs to access petrol stations, which is unsustainable overall, the council supports the retail convenience activity allowed in petrol stations to 280 sqm net floorspace. This measure provides landowners with more flexibility and will contribute towards increasing the financial viability of new and existing petrol stations. However, retail floorspace extensions above 280 sqm net will not be supported to ensure that such developments would not have an adverse impact on the retail vitality and viability of Merton's designated town centres.

Merton's primary shopping areas – the extent is shown on the Policies Map

<u>Primary Shopping Area</u>	<u>Designations</u>
<u>Arthur Road</u>	<u>Local town centre</u>
<u>Colliers Wood</u>	<u>District town centre</u>
<u>North Mitcham</u>	<u>Local town centre</u>
<u>Mitcham</u>	<u>District town centre</u>
<u>Morden</u>	<u>District town centre</u>
<u>Motspur Park</u>	<u>Local town centre</u>
<u>Raynes Park</u>	<u>Local town centre</u>
<u>South Wimbledon</u>	<u>Local town centre</u>
<u>Wimbledon</u>	<u>Major town centre</u>
<u>Wimbledon Village</u>	<u>Local town centre</u>

Policy TC13.7

Protecting corner / local shops

In predominantly residential areas, outside town centres and neighbourhood parades, to ensure that there are convenience shopping facilities and other services located within walking distance of all residents in Merton, the council will seek to protect corner/local shops for which there is need, by:

- a.** Permitting the change of use of a corner/local convenience shop to a wider range of uses including other shops, businesses, cafes and restaurants public houses, health and community uses where:
 - i.** There are alternative convenience shops located within 400 metres;
 - ii.** The proposal will have no significant adverse effects on the amenities of nearby residents, road safety, traffic movements or car parking impacts; and
 - iii.** Independent access to upper floors is ensured.
- b.** Only permitting the change of use of a corner/local convenience shops to residential where (a) can be met and where:
 - i.** There are no alternative convenience shops located within 400 metres;
 - ii.** It can be demonstrated by full and proper marketing of the site for convenience use at reasonable prices for at least 12 months (1 years) and to the council's satisfaction that there is no realistic prospect of convenience use in the future; and
 - iii.** An active frontage is provided.

Justification **SUPPORTING TEXT**

- 13.7.1.** This policy helps to set out how proposals for the change of use of town centre type uses outside of Merton's town centres will be considered.
- 13.7.2.** To support sustainable development, small convenience shops are encouraged to locate within 5 minutes walking distance (400 metres radius) of residential areas in Merton, to reduce the need to travel for day-to-day convenience items.
- 13.7.3.** It may not be possible to retain retail use, especially if there is a lack of customer demand and/ or alternative facilities are available nearby.
- 13.7.4.** Government changes to the Use Class Order introduced in 2020 allows any shops with floorspace above 280sqm (i.e. bigger than a Sainsburys Local or Tesco Metro) to change to other business, service and community uses without the need for planning permission. The same national use class order allows small shops to change to other uses (below 280sqm) but only if there is another small shop within 1km.
- 13.7.5.** In Merton, we consider that sustainable development in line with the NPPF paragraph 8 includes supporting resident's access to essential food within 5 minutes' walk of their homes. This is particularly important for residents who, for whatever reason, would struggle with a 2km walk round trip to bring food shopping home.
- 13.7.6.** In circumstances where there are no alternative convenience shops located within 5 minutes walking distance (400 metre radius), proposals for change of use from convenience shops to those detailed in part (a) of will be permitted where it can be demonstrated to the council's satisfaction that as a result of full and proper marketing at reasonable prices for at least 12 months (1 year), that convenience retail uses are not viable. The applicant will be required to provide Marketing and Vacancy evidence in accordance with the criteria set out in the Appendices.

Policy TC13.8

Food and drink / leisure and entertainment

Proposals for restaurants and cafes, public houses, hot food takeaways and leisure and entertainment uses will be supported, provided all of the following criteria have been met:

- a. The proposals would not have an unacceptable impact on local amenity and the general environment, car parking, traffic congestion and road safety. Proposals would need to take into account the:
 - i. Size of unit;
 - ii. Characteristics and type of use proposed;
 - iii. The nature of the area;
 - iv. The likely cumulative effect of food and drink, leisure and entertainment uses in the area, including combined and cumulative effects at different times of the day and night; and
 - v. Whether the location is well served by public transport.
- b. Adequate noise containment measures are included and sound insulation is provided, where appropriate, to safeguard the amenity of adjoining residential and business uses;
- c. They would not have an unacceptable effect on local amenity through noise, disturbance or fumes;
- d. The proposed opening hours would be acceptable; and
- e. Adequate ventilation, waste disposal, litter management and crime prevention arrangements appropriate to the use and location can be provided.

Hot food takeaways

- f. Proposals which result in an over-concentration of hot food takeaways will not be permitted as this would detract from the ability to adopt healthy lifestyles.

- g.** The council will manage and monitor proposals for new hot food takeaways found within 400 metres of the boundaries of a primary or secondary school to promote the availability of healthy foods.
- h.** Where any development proposal involving hot food takeaways are permitted, the Council will require the operator to achieve and operate in compliance with, the Healthier Catering Commitment standard.

Protection of public houses

- i.** Proposals that will result in the loss of a public house will only be permitted where all the following criteria are met:
 - i.** the applicant can demonstrate to the council's satisfaction that the public house is no longer economically viable; and
 - ii.** there are alternative public houses located within the local area.

Protection of leisure and entertainment

- j.** Proposals for the loss of entertainment and leisure facilities will be supported where the applicant can demonstrate to the council's satisfaction that the leisure and entertainment uses are no longer viable.

Justification **SUPPORTING TEXT**

- 13.8.1.** The NPPF ~~2021~~ 2019, the London Plan and Merton's strategic policies encourage a range and mix of town centre type uses to Merton's town centres which contributes to their vitality and viability. This policy will contribute towards delivering this by setting out how proposals for new or the change of use from food and drink/ leisure and entertainment uses will be considered in Merton.
- 13.8.2.** The scale of new food and drink/ leisure and entertainment uses must meet the requirements of Policy TC13.5 *Merton's town centres and neighbourhood parades*.
- 13.8.3.** As detailed in Policy TC13.6 *Development of town centre uses outside town centres*, to strike a balance between Merton's aspirations for economic growth whilst protecting the vitality and viability of Merton's designated town centres, proposals for large food and drink/ leisure and entertainment uses will be required to submit a sequential test and may be required to submit an impact assessment.
- 13.8.4.** Changes to the national Use Class Order in 2020 allow some premises to change uses without the need for planning permission (e.g. restaurants to shops or gyms, all within the Use Class E). However in the 2020 Use Class Order most leisure and entertainment premises will now be classed as "sui generis" (e.g. theatres, pubs and bars, cinemas, live music venues, nightclubs etc) which will require planning permission to open or change to another use.

Food and drink / leisure and entertainment uses

- 13.8.5.** The food and drink sector and leisure and entertainment sector is very dynamic and increasingly diverse. This sector includes cafés, restaurants, pubs, cinemas and bowling alleys. These facilities reflect changing population structures, lifestyles and expectations, and are now a regular part of many people's lives rather than a special event.
- 13.8.6.** Merton's town centres have above average representation of cafes and restaurants in particular hot food takeaways and there are no specific areas of deficiency. Although Merton's residents have relatively good access to a range of commercial leisure and entertainment facilities in neighbouring boroughs and central London, there may be potential for additional health club facilities in line with population growth.

- 13.8.7.** The range of restaurants and the evening economy are poor in some centres, including Mitcham, Morden and Colliers Wood. Therefore the council encourages restaurants, cafes, leisure and entertainment uses in these centres which contributes towards supporting shops and other businesses. By improving existing and encouraging more evening economy uses in these areas will extend the centres' use beyond shop opening hours.
- 13.8.8.** However, such uses can sometimes cause problems to nearby residents and businesses because of noise, fumes, traffic and other disturbances, especially at night. The council will therefore seek to control the size and location of such premises, particularly where there is residential accommodation adjacent, close to, or above premises. In addition, these amenity problems are exaggerated when groups of these facilities are located close together and their cumulative and combined impact becomes significant.
- 13.8.9.** Merton Council's Licensing Policy imposed a cumulative impact area in Wimbledon Village and Wimbledon town centre which restricts the number of licences available for cafes, restaurants, public houses, hot food take- away, leisure and entertainment uses, if licences are required.
- 13.8.10.** Where appropriate, conditions and legal agreements will be applied to ensure these developments meet the council's standards, and to protect residential amenity. Conditions may be applied to control the hours of opening, and type of use. Agreements may also include financial contributions for CCTV and other crime prevention and road safety measures.

Hot food takeaways

- 13.8.11.** As set out in Policy HW2.2 *Developing Healthy Places*, the council will look to create and promote a healthy environment in Merton. As such, when considering new development proposals for fast food takeaways located 400 metres from the exit and entrance of an existing or proposed school the council will have regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of hot food takeaway outlets and healthy eating initiatives taking place at the school. As set out in Policy HW2.2 *Developing healthy places* the council will encourage all new food establishments in Merton to sign up to the Healthy Catering Commitment.
- 13.8.12.** Local research in Merton shows that there is a concern with impacts of the over concentration of hot food takeaways, particularly on Merton High Street, London Road (Mitcham) and Streatham Road. Planning permission will not be permitted for hot food takeaways where there is an ‘over-concentration’. Generally, an ‘over-concentration’ of hot food takeaways would be the development of more than three hot food takeaways in a shopping parade of 10 consecutive shops.
- 13.8.13.** By helping to prevent the over concentration of hot food takeaways in Merton’s high streets, this policy helps ensure that residents have access and choice between a wide range of retail services and facilities including access to healthier food options.
- 13.8.14.** This policy is part of a holistic approach that Merton Council, together with other organisations, is taking to improve opportunities for healthy lifestyles and to tackle obesity issues in the borough. Other projects in Merton include the “healthier catering commitment” to help food outlets offer healthier options. National policy, including the NPPF, the London Plan and Merton’s Policy HW10.1 *health and wellbeing* strongly support this approach
- 13.8.15.** When considering proposals for change of use to hot food takeaways, the first unit in each parade of shops (where possible) should be used as the starting point to ascertain if the proposal meets policy. A ‘unit’ refers to individual shops.

Protection of public houses

- 13.8.16.** In instances where planning permission is required, the council will resist the loss of public houses as they serve a community role (for example, by providing space for clubs, meetings or performances) unless:
- alternative provision is available nearby (within 800 metres); and,

- it can be demonstrated to the council's satisfaction that the public house is no longer economically viable.

13.8.17. To demonstrate a public house is no longer economically viable, the applicants:

- Would need evidence to demonstrate that the public house as a business is no longer economically viable; and
- To demonstrate that full and proper marketing of the site at reasonable prices for a period of 18 months (1 ½ years) confirms the non-viability for these purposes. Applicants will be required to provide marketing evidence in line with the Marketing and Vacancy criteria set out in the Appendices.

Protection of leisure and entertainment facilities

13.8.18. Wimbledon town centre is identified as a 'night time economy cluster of regional/ sub-regional importance' in the London Plan. A cultural quarter has emerged to the east end of The Broadway, with two theatres, leisure, entertainment and community facilities and a selection of restaurants. Combined with the cinemas, wine bars and restaurants these leisure and entertainment facilities makes Wimbledon vibrant and active throughout the day and evening therefore attracting residents, workers and visitors to the benefit of all businesses.

13.8.19. In terms of shopping floorspace, Colliers Wood competes directly with Wimbledon town centre by attracting many high street and multiple retailers. However Colliers Wood does not have the same range and choice of evening activities nor does it have the Wimbledon 'brand' which is internationally recognised. To ensure that Wimbledon remains vibrant despite competition from other town centres, the council will seek to attract and retain leisure and entertainment facilities in Wimbledon town centre.

13.8.20. Currently the choice and quality of the evening economy is poor in Colliers Wood, Mitcham and Morden town centres. Therefore, the council aims to maintain existing leisure and entertainment facilities in these areas, where viable.

13.8.21. In instances where planning permission is required for proposals for change of use from leisure and entertainment uses to alternative town centre type uses in Merton's town centres, the council will require full and proper marketing of the property for its permitted use at reasonable prices for a period of 18 months (1½ years). However, for proposals outside of town centres, where proposals for change of use from leisure and entertainment to alternative uses except employment and community and cultural uses the council would require full and proper marketing of the property for its permitted use at reasonable prices for a period of 18 months (1½ years). Applicants will be required to provide marketing evidence in line with the Marketing and Vacancy criteria set out in the Appendices.

Policy TC13.9

Culture, arts and tourism development

The council will maintain, improve and encourage cultural, arts and tourism in Merton by:

- a.** Supporting:
 - i.** All proposals for cultural and tourism development which are likely to generate a large number of visitors in either Merton's town centres or other areas of the borough which have high levels of accessibility (PTAL level 3 or above) and are within close proximity to additional services for employees and visitors.
 - ii.** Small (generally floorspace below 280 sqm) proposals for culture, arts and tourism development throughout the borough.
- b.** Encouraging improvements or expansion to existing cultural, arts and tourism in Merton, where this complements Merton's strategic objectives for the areas in which they are located.
- c.** Ensuring proposals for culture, arts and tourism developments are well designed, by requiring that:
 - i.** The size and character of the site or building are suitable for the proposed use;
 - ii.** The development will be compatible with the character and appearance of the area;
 - iii.** The amenities of local residents and businesses will not be harmed by way of noise, disturbance, loss of light or privacy;
 - iv.** There will be good access and links to modes of transport other than the private vehicle; and
 - v.** Vehicular access to and from the highway will be safe.
- d.** Balancing the benefits of the submitted proposals opportunity to provide employment and other contributions to the local economy against the above criteria.

- e. Supporting proposals for the change of use from culture, arts and tourist accommodation to alternative uses only if it can be demonstrated to the council's satisfaction that full and proper marketing of the site at reasonable prices for a period of 30 months (2 ½ years) confirms the financial non- viability for these purposes, unless suitable replacement site for the culture and arts use which is of better standard and quality is provided locally; or, ii. Where it can be demonstrated that the existing tourist accommodation is no longer viable and does not provide facilities for the local community.
- f. Subject to the policy protection of scattered employment sites, protecting, maintaining and encouraging the work-space needed to support creative and cultural industries across the borough.

~~Justification~~ SUPPORTING TEXT

- 13.9.1. Culture, arts and tourism development creates economic and social benefits by attracting and entertaining residents, business visitors and tourists. These uses provide employment and complement the shops services, cafes, restaurants, public houses and leisure and entertainment facilities in Merton's town centres, contributing towards their overall vibrancy.
- 13.9.2. Arts and cultural uses include theatres, museums, galleries and concert halls. For this policy, tourist accommodation includes hotels, hostels [sui generis], accommodation such as AirB&B and guesthouses and other tourist accommodation.
- 13.9.3. We welcome new proposals for culture, arts and visitor developments. To strike a balance between Merton's aspirations for economic growth whilst protecting the vitality and viability of Merton's designated town centres, proposals for new large culture, arts and tourist developments located edge-of-centre and out-of-centre, will be required to submit a sequential test.
- 13.9.4. Public Transport Accessibility Levels (PTAL) informs geographical area levels access to public transport. Higher PTAL levels are concentrated around the town centres and transport interchanges of Wimbledon, Morden, Colliers Wood, Mitcham and Raynes Park. Areas to the south east and southwest of the borough have the lowest accessibility levels. As set out in the transport policies in this Local Plan, applicants should use Transport for London's WebCAT free online tool to get the most up to date assessment of public transport accessibility for their site.

Arts and culture

- 13.9.5.** In Merton there are a number of arts and cultural uses that the council wishes to protect and enhance including theatres in Wimbledon town centre and Merton Abbey Mills, handcrafts, creative industries and a theatre cultural activities (Abbeyfest, Cannizaro Festival, Mitcham Carnival), museums, sports arenas (such as the All England Lawn Tennis Club, Tooting and Mitcham Hub, the AFC Wimbledon stadium), Deen City Farm and the Wimbledon School of Art. There are recording and film studios scattered throughout the borough and many businesses in Merton support the cultural, creative, arts and tourism sector (e.g. providing stage lighting, production props etc.) across London and beyond.
- 13.9.6.** In Merton, the creative sector comprises a range of activities including publishing books, newspapers and software, printing, TV, radio and film production, and photography.
- 13.9.7.** Proposals will be supported that build upon the borough's strength in creative and cultural information, particularly proposals that improve Merton's existing offer.

Tourism

- 13.9.8.** There is a need for a variety of tourist accommodation and facilities to cater for leisure tourism and business visitors, to make Merton's tourism and culture sector more viable and sustainable all year round.
- 13.9.9.** Although there is uncertainty around the aftermath of COVID19 and its impact on business and tourism, there remains a need for high quality hotels with conference facilities in Merton, particularly in Wimbledon town centre, to support businesses visitors and to provide space for local functions. Merton is conveniently situated to help provide additional tourist facilities with good public transport links to central London. The borough also has its own tourist attractions, although those outside the Wimbledon area generally have a lower profile and consequently lower visitor interest. Where possible, facilities provided to guests at larger hotels should also be made available to the local community to help improve the quality of life for local businesses and residents.
- 13.9.10.** In determining the location of hotel, hostel, guest house and B&B facilities, good public transport services to central London and to other Merton tourist attractions are an important factor.

13.9.11. Tourist accommodation should generally be situated in areas of good public transport accessibility and adjacent to the secondary road network to minimise traffic congestion for residents. The capacity and proximity of similar existing facilities should also be considered. The council will not support tourist accommodation (such as apart-hotels) where this displaces capacity for residential accommodation (Use Class C3).

Protection of arts, culture and tourism

13.9.12. Existing arts, culture and tourist attractions and accommodation will be protected in order to maintain the benefits of arts, culture and tourism to the local community. This will benefit the community by providing jobs, attracting visitors, contributing to the overall economy and to local educational resources, and providing a variety of facilities for both residents, businesses, students and visitors.

13.9.13. Since May 2013 government has made a variety of changes to the General Permitted Development Order to allow development to take place without the need for planning permission. In instances where planning permission is required, redevelopment or change of use from arts, culture and tourism development will be permitted only if the current use is proved to be unviable or unless it meets the policy exemptions detailed in this policy above.

13.9.14. To demonstrate that full and proper marketing has been undertaken, the council requires the applicant to demonstrate that:

- The site has been marketed for the time period detailed in policy unless otherwise agreed with the council;
- All opportunities to re-let the site has been fully explored (including more flexible use of the space);
- The site has been marketed using new (on the internet) and traditional marketing tools available; and,
- The site has been marketed at a price which is considered reasonable (based on recent and similar deals or transactions).



CHAPTER 14. **INFRASTRUCTURE**

Strategic policy IN 14.1 Infrastructure

We support the provision and improvement of **I**nrastructure across the borough and will work with relevant providers to ensure that the necessary **I**nrastructure is secured to support growth in the borough over the plan period. We will:

- a. Expect new development to identify, plan for and provide any necessary **I**nrastructure and require that, where necessary, **I**nrastructure should be completed prior to occupation.
- b. Work with service providers and partners to enable them to deliver the provision of services and facilities for the projected population growth, especially in areas of significant new homes and areas of deficiency.
- c. Encourage dialogue between service providers and developers. Where appropriate opportunities arise, the co-location of services and joint delivery of **I**nrastructure by service providers will be supported.
- d. Support the delivery of high-quality, high-speed and reliable **D**igital **I**nrastructure to enable the expansion of electronic communications networks, which include full fibre broadband connections and next generation mobile technology. Development proposals will be expected to provide digital connectivity infrastructure in accordance with London Plan Policy S16.
- e. Support the provision of emergency services and facilities as required by emergency service providers.
- f. Work with partners to facilitate the delivery of sport, recreation and play facilities and to encourage the shared use of sites and spaces.
- g. Expect **I**nrastructure provision to be in keeping with the council's net zero carbon targets.
- h. Work in partnership with providers to ensure that water and wastewater infrastructure improvements are delivered and implemented across the borough.**

Justification Supporting Text

- 14.1.1 The infrastructure needs for Merton will be primarily to support the additional housing required over the Local Plan period. We have identified strategic priorities for health provision, education, transport infrastructure, **D**igital **I**nfrastructure, water, wastewater and sewerage provision and supporting future needs of the emergency services. Where there is an **I**nfrastructure capacity problem, we will require developers to fund appropriate improvements and where necessary, ensure improvements are completed prior to occupation.
- 14.1.2 We will continue to encourage service providers and developers to interact with each other - pre, during and post planning application stage. This is to ensure that all necessary infrastructure can be identified and planned for and that where an opportunity arises for services to be co-located and jointly delivered, this can be done with minimal interruption to local residents and businesses.
- 14.1.3 In accordance with national guidance on planning obligations, we will require new development to provide or fund local infrastructure improvements. The Community Infrastructure Levy will be applied as appropriate, alongside other investment, to help deliver infrastructure. Site-specific planning obligations will also be used to secure delivery of infrastructure needs arising from development.
- 14.1.4 In order to support growth in the borough, the council will safeguard and improve essential social, physical and green infrastructure and work in partnership with service providers to ensure the delivery of the additional infrastructure. The **planned potential** and predicted infrastructure requirements for the Local Plan are identified in the Infrastructure Delivery Plan 2021 (IDP).
- 14.1.5 The IDP sets out the infrastructure needs for Merton over the lifetime of the Local Plan, through an analysis of current provision and the consideration of anticipated population and housing growth. The Infrastructure Delivery Schedule provides a list of infrastructure projects that have been identified for delivery within the first five years of the Local Plan, in addition to a number of longer-term projects. The council will continue to work with infrastructure partners, providers, stakeholders and the community to identify and update requirements for the provision of infrastructure and services throughout the borough. The council will also seek to coordinate infrastructure delivery where it is appropriate to do so, while protecting local amenities and environmental quality.
- 14.1.6** In line with the London Plan, the relationship between green and social infrastructure is considered to be important in Merton, particularly given the ambition to create healthier places for all. We are committed to ensuring that there is adequate provision of community, social and open space facilities to improve the quality of life for residents.

Further policies on **S**ocial and **C**ommunity **I**nfrastructure and sports and recreation facilities are provided in Policy IN14.2 and IN14.3 and policies on **O**pen **S**pace and **G**reen **I**nfrastructure are considered in Chapter 15 **G**reen and **B**lue **I**nfrastructure.

14.1.7 Ambitious net-zero carbon targets have been set of 2030 for the council and 2050 for the borough, designed to achieve a step-change in our actions to reduce emissions and adapt to the impacts of climate change. The Merton Climate Strategy and Action Plan recognises that the three major transitions to the economy, to building and energy and to transport all require substantial changes to infrastructure to be in keeping with emerging national and regional policies such as the London Mayor's 1.5 degree Action Plan, the National Government's Clean Growth Strategy and the views of the [National Infrastructure Commission](#).

Digital Infrastructure

14.1.8 Advanced, high-quality, high-speed and reliable communications infrastructure is essential for economic growth and social wellbeing. As such, the council supports the promotion and delivery of full-fibre or equivalent **D**igital **I**nfrastructure. Future digital connections should be provided with a focus on affordability, security and resilience and should provide access to services from a range of providers.

14.1.9 Ofcom currently defines superfast broadband as being a minimum download speed of 30 megabits per second (Mbit/s), which is a measure of data transfer speed. High speed broadband can help businesses, through increased efficiencies, helping to drive jobs and economic growth. It can also help residents to access information, products and services more easily.

14.1.10 Merton has some areas with low or poor digital connectivity. According to Ofcom's Connected Nations Update: Summer 2020, 2% of premises in Merton are unable to receive a minimum download speed of 30Mbit/s. We seek to improve this, and make Merton a digitally inclusive borough, by encouraging the expansion of **D**igital **I**nfrastructure into areas where there are currently gaps in connectivity. This includes industrial areas across Merton, which historically have had poor connectivity. Applicants should work with the council and broadband delivery partners to find appropriate solutions to deliver broadband to new and existing residents and businesses.

14.1.11 We are also supportive of the provision of free publicly owned and available Wi-Fi in public realm areas. Fast and reliable **D**igital **I**nfrastructure should be accessible to all; it helps support the way that people live and work, helps digital and creative industries to thrive and promotes innovation.

- 14.1.12 Operators should demonstrate through the planning process that equipment will operate within the International Commission on Non-Ionizing Radiation Protection guidelines for public exposure.
- 14.1.13 It is important to ensure that the installation of Digital Infrastructure, together with any necessary enabling works, will not result in unacceptable damage to visual amenity or harm to environmentally sensitive features or locations. Specific design requirements for Digital Infrastructure are set out in Chapter 12 – Design Places and spaces in a growing borough.

Water and Wastewater Infrastructure

- 14.1.14 To accommodate the expected population and housing growth across the borough, the council is supportive of improvements and upgrades to water supply and wastewater services, to contribute to security of supply.
- 14.1.15 ~~We~~ The council will work with the water and wastewater companies/providers to seek to ensure that there is adequate water supply, surface water, foul drainage, and wastewater infrastructure and sewerage treatment capacity to serve all new developments. Developers will also need to agree details with water and wastewater companies for adequate water supply, surface water, foul drainage and sewerage treatment capacity.
- 14.1.16 Developers will be required to demonstrate as part of the planning application process that there is adequate capacity both on and off-site to serve the development and that the development would not lead to problems for existing users. In some circumstances this may make it necessary for developers to will necessitate that developers carry out appropriate studies to ascertain the effect proposed development will have on the existing infrastructure. Overloading of the system will not be permitted.
- 14.1.17 Where there is a capacity problem the developer will be required to fund appropriate improvements to be completed prior to completion of the development. An exception to this may be where the water company has improvement works programmed in that align with the completion time of the development. The council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of problem the developer will be required to fund appropriate improvements to be completed prior to completion of the development.
- ~~14.1.16 Thames Water and SES Water will work with developers and the council to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development.~~

~~14.1.17 Developers are encouraged to contact the water and wastewater companies as early as possible to discuss their development proposals and intended delivery programme to assist operators with identifying any potential water and wastewater network reinforcement requirements.~~

~~14.1.18 Where appropriate, planning permission for development which results in the need for off-site infrastructure upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. Where there is a capacity constraint, phasing conditions will be used as appropriate to ensure that any necessary infrastructure upgrades can be delivered ahead of the occupation of the relevant phase of a development.~~

14.1.18 We are supportive of improvements to water supply or wastewater facilities, to ensure adequate long term water supply and wastewater management throughout the borough.

Gas and electricity

14.1.19 We will continue to work with utility suppliers, and expect developers to do the same, to ensure that the safe and secure supply of utilities such as electricity and gas is not compromised, as we transition towards a low carbon energy supply.

14.1.20 It is estimated that gas is currently responsible for around 40% of greenhouse gas emissions in Merton, mostly from heating residential properties. Whilst greenhouse gas emissions from electricity production are predicted to fall substantially, there are limited options to reduce emissions from gas. Until a national strategy to decarbonise the gas grid has been developed, the council will support activities to move away from natural gas and towards electrification and other forms of low carbon heating and cooking. This is likely to result in a reduction in demand of up to 1TWh gas per year by 2050, in accordance with GLA zero carbon pathway modelling.

14.1.21 Demand for electricity is likely to increase over time, mainly due to a transition away from gas heating and cooking towards electric heating, and an increase in uptake of electric vehicles. The additional demand is estimated to be around 50GWh/year by 2050 (GLA zero carbon pathway modelling), but is uncertain and is influenced by the extent to which local renewable energy and energy storage is installed (e.g. solar PV and battery technology), and the roll out of smart technologies which serve to actively manage the peaks in electricity supply.

14.1.22 National Grid Electricity Transmission (NGET) owns and maintains the electricity transmission system in England and UK Power Networks owns the electricity distribution network. National Grid Gas (NGG) owns and operates the high pressure gas

transmission system across the UK, whereby gas leaves the transmission system and enters the distribution networks at high pressure.

- 14.1.23 Southern Gas Networks owns and operates the local gas distribution network in Merton. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply.
- 14.1.24 National Grid's underground electricity transmission cables cross through Colliers Wood and Mitcham. In addition, the National Grid's high voltage overhead electricity transmission lines run through the borough along the River Wandle through [the](#) Colliers Wood, [Wimbledon](#) and Mitcham [neighbourhoods](#). ~~Five Three~~ of the proposed Site Allocations ([CW2](#), CW5, [Wi12](#), Mi1 and Mi16) contain or are within close proximity to the National Grid Infrastructure. Potential developers of sites with overhead lines should be aware that it is National Grid policy to retain existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national [or regional](#) importance. ~~which has been identified as such by central government.~~
- 14.1.25 We are supportive of working with UK Power Networks to explore the extent to which the electricity distribution network requires upgrading; and the approach needed to minimise cost and disruption.
- 14.1.26 Developers must take into account the location and nature of the existing electricity transmission equipment when planning developments. [The following gGuidance should be referenced prior to submitting a planning application: Working near our assets, Linesearch before u dig and Guidelines for development near pylons and high voltage overhead power lines.](#) ~~is outlined in National Grid's "A Sense of Place" guidelines on how to create high quality development near overhead lines.~~

Travel and transport

- 14.1.27 Merton's Climate Strategy and Action Plan recognises that a wholesale change in the way we travel in Merton is required to reduce greenhouse gas emissions from petrol and diesel vehicles, which are estimated to account for 19% of greenhouse gas emissions in the borough. By 2050 virtually no petrol and diesel vehicles will use Merton's roads. To support a major increase in cycling and walking, a reduction in the use of private vehicles and a shift to electric vehicles and an integrated cycling, walking and electric vehicle charging network will take place.
- 14.1.28 Public transport accessibility is not evenly spread across the borough and more deprived areas such as parts of Mitcham and Morden neighbourhoods currently have

lower levels than some of the western areas of the borough. We will continue to work with the relevant public transport partners, including Transport for London and Network Rail to deliver better transport services, as identified in the Infrastructure Delivery Plan and improve accessibility and connectivity. Refer to the Transport policies in Chapter 16 for further details.

Sport, Recreation and Play

14.1.29 The following evidence base documents have been published on [Merton Council's "Local Plan Research" webpage](#) relating to the sporting and recreation infrastructure needs in the borough. These documents support the Local Plan and should be referenced for all relevant planning applications.

- The Merton Green Infrastructure, Biodiversity and Open Space Study 2020.
- The Merton Playing Pitch Strategy 2019.
- The Merton Indoor Sports Facility Study 2020.

Policy IN14.2

Social and Community Infrastructure

Taken as a whole, Social and Community Infrastructure covers a wide variety of uses. These include community and affordable meeting spaces, libraries, places of worship, education, youth services, childcare and early years, health and social care, services for the elderly or disabled, sport, recreation, informal play spaces, emergency services and other criminal justice or community safety facilities. This list is not intended to be exhaustive and other uses can be included as Social and Community Infrastructure.

We place a high priority on the provision and improvement of Social and Community Infrastructure. It is essential to support those currently living, working and visiting Merton and to ensure future changes can be accommodated. These places can be the heart of local communities and they are important to ensure residents have a high quality of life. We will:

- a. Support and encourage the most effective use of Social and Community Infrastructure, to support the changing priorities and needs in the borough.
- b. Require any proposals involving the loss of Social and Community Infrastructure to clearly demonstrate:
 - i. that the loss would not create, or add to, a shortfall in provision for the specific use, through providing a Community Needs Statement; and
 - ii. that there is no viable demand for any other social and community infrastructure use on the site, through providing marketing and vacancy evidence for a period of at least 12 months, unless it forms part of a wider public service transformation plan.
- c. Consider other uses through redevelopment, where the council is satisfied that the evidence in (b) has been provided and the change of use away from the social and community infrastructure use has been justified.
- d. Support and encourage the multi-use of social and community infrastructure.
- e. Support proposals for new, or extensions to existing, social and community infrastructure where:
 - i. it provides for an identified need.
 - ii. it is of a high quality and inclusive design providing access for all.
 - iii. it is provided in multi-use, flexible and adaptable buildings or is co-located with other social infrastructure uses, where practicable.
 - iv. it is accessible by a range of transport modes including walking, cycling and public transport.
 - v. appropriate access, parking and cycling facilities are provided, relative to the location and scale of the development; and
 - vi. the use(s), including hours of operation, would not unacceptably harm the amenities of the surrounding area.

Health

- f. Support the provision of new or improved healthcare facilities in the borough, working in partnership with Merton's Clinical Commissioning Group (CCG) and NHS England to meet the needs of Merton's projected population growth, especially in areas of regeneration or areas of deficiency.
- g. Support the aim of improved access to primary health care facilities, which could extend GP surgery hours and support the re-use of social infrastructure and the re-location of services, wherever possible.
- h. Support the principle of a new Health and Wellbeing Community Hub in Mitcham.

Education

- i. Support proposals for new primary and secondary schools, or for the extension or expansion of existing schools including Special Educational Needs (SEN), where they help to deliver the council's agreed strategy for provision of additional state-funded school places in the borough and where they meet the requirements set out in the London Plan education policy S3B.
- j. Resist proposals involving the loss of a state-funded school either in use, or previously in use, unless the council's agreed strategy for school places has identified the site as surplus and its development for other uses would contribute to improvements in the delivery of school places in the borough.

Justification Supporting Text

14.2.1 Taken as a whole, Ssocial and Ccommunity Infrastructure covers a wide variety of uses. These include community and affordable meeting spaces, libraries, places of worship, education, youth services, childcare and early years, health and social care, services for the elderly or disabled, sport, recreation, informal play spaces, emergency services and other criminal justice or community safety facilities. This list is not intended to be exhaustive and other uses can be included as social and community infrastructure.

14.2.2 These places can be publicly or privately funded or run by charities, free at the point of delivery or paid for. There are a variety of different needs for social and community infrastructure at different stages of people's lives. These types of infrastructure also play an important role in developing strong and inclusive communities by providing opportunities to bring together different groups of people.

14.2.3 Many of these services are also a major source of employment in Merton; civic and government functions such as schools, the NHS, the fire brigade and other local government sectors are large employers in Merton with a range of jobs in terms of salaries and skills.

14.2.4 The coronavirus (COVID-19) pandemic has highlighted just how important social and community infrastructure is to the local community. The impact of the lockdown on mental health could lead to a longer-term erosion of people's physical health and affect people who have previously not experienced poor mental health. While we do not yet know the full impact that covid-19 has had on our local communities, it is essential that all new and existing residents in Merton have access to social and community infrastructure, to ensure a good quality of life. The council will continue to work closely with its partners, such as the NHS, to ensure that the recovery after covid-19 is prioritised for the health and wellbeing of our residents.

14.2.5 Sports and leisure facilities (including Playing Pitches), should be tested against paragraph 97 99 of the NPPF and considered against the requirements of London Plan Policy S5. Further policies on these facilities are provided later in this Chapter in Policy IN14.3.

14.2.6 Where appropriate, the use of S106 or planning conditions will be used to ensure delivery of required infrastructure in the borough.

Use Classes Order

14.2.7 In 2020, Government introduced successive statutory instruments and changes to the Use Classes Order. These changes include the creation of new Use Classes for Class E

(Commercial, Business and Service), Class F.1 (Learning and Non-residential institutions) and Class F.2 (Local community), and changes to the list of Sui Generis uses (uses that cannot be included in a specific class).

14.2.8 The government's Explanatory Memorandum states that these changes were "*primarily aimed at creating vibrant, mixed use town centres by allowing businesses greater freedom to change to a broader range of compatible uses which communities expect to find on modern high streets, as well as more generally in town and city centres.*"

14.2.9 The recent changes to the Use Classes Order allow some premises to change uses without planning permission e.g. nursery or health centre to a shop, café, restaurant. Merton is supportive of the principle of greater flexibility for what business and community spaces can be used for, however we will also seek to minimise any unintended harm that flexible proposals could bring to the local amenity of existing residents and future users.

14.2.10 We will assess planning applications in line with this policy for any proposals that involve changes to, or a loss of **S**social and **C**community **I**nfrastucture. Planning conditions or obligations may be used to ensure no harm to the local amenity of existing residents and future users.

Protect existing uses

14.2.11 We will safeguard existing social and community uses unless there is adequate justification for the loss, or provision for a replacement.

14.2.12 Applications proposing a loss will have to demonstrate that the **S**social and **C**community **I**nfrastucture use is no longer viable on the site. For the purpose of Policy **IN14.2** ~~IN6.2~~ (b) and (c), a social or community infrastructure use refers to clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law courts, and non-residential education and training centres. Applicants will have to provide the following information:

1. A Community Needs Statement

14.2.13 This is required to clearly set out the reasons why the site is unable to support social and community uses and why the existing use is no longer required on site. Where there is a proposal for a replacement, relocation or consolidation of a use, this document will also need to demonstrate that the needs of the current users of the site have been considered and an appropriate facility can be provided elsewhere.

14.2.14 Applicants are encouraged to discuss the scope and content of the Community Needs Statement with the council at an early stage, preferably through the Pre-Application process, to ensure that the information provided is proportionate to the scale and significance of the proposed change or loss.

14.2.15 The following should be covered by a Community Needs Statement:

- The reasons why there is no longer an identified community need for the facility. This may include reasons why a facility no longer meets the needs of its users.
- Details of the current/former service provided on site and if relevant, information on how a better service would be provided elsewhere. This may include information on physical constraints such as access or user requirements.
- Evidence showing that consultation with current/former users of the use on the site has taken place, including feedback on the proposed changes.
- Details on all engagement with the relevant stakeholders that are involved in providing services on site, or that rely on the provision of services on site. For example, the Merton CCG and NHS; and
- Details of any alternative locations that have been identified and assessed as being suitable for co-location.

14.2.16 Additional information may be requested by the council, where required.

2. Marketing and Vacancy Evidence

14.2.17 This is required to provide an assessment of the continued demand for the existing use and all other suitable social and community uses that could be accommodated on the site. The marketing and vacancy evidence will need to be provided for a minimum period of 12 months and should be carried out in accordance with the criteria set out in the Appendices.

Support co-location

14.2.18 In line with the London Plan, the council supports proposals that make the best use of land, including the co-location of uses such as schools, colleges, sports and community providers for the wider community. This is particularly relevant where these are located in areas that are highly accessible.

14.2.19 We strongly encourage the shared use and co-location of sites, which allows for land to be used more efficiently, assists service providers to work collaboratively and provides for the sharing of maintenance and management costs. Shared facilities that adopt principles from the Healthy Streets Approach and are easily accessible by public transport, cycling and walking will enable greater community inclusion and participation.

- 14.2.20 We will also support the shared use of community sites by different service providers across the public, private and voluntary sector, for example as is being planned at the Mitcham Health and Wellbeing Community Hub.

The provision of new social and community uses

- 14.2.21 We will support the development of new social and community infrastructure uses where there are identified gaps in provision.
- 14.2.22 The location and layout of social and community infrastructure is often determined by the type and use of the site, for example the area reached by a local fire station can be far wider than the area needs of a primary school. We will require new development proposals to ensure that these places are easily accessible and well connected; they should be easily reached on foot, bicycle or by public transport and fully accessible to all parts of the community, including people with a disability and older people.
- 14.2.23 Social and community infrastructure provides opportunities to develop strong and inclusive communities, contributing to social integration and the desirability of a place. New social and community infrastructure provided as part of major developments should be made available to all residents, irrespective of tenure. Proposals should also include a plan for the management and maintenance of new developments, which may be formalised through the use of planning conditions or obligations. We will also support new proposals which promote and incorporate a circular economy.

Health

- 14.2.24 A key aim for the council is to encourage healthier communities by improving health outcomes and reducing health inequalities. Appropriate infrastructure needs to be in place to support health and wellbeing, encourage the provision of sport and leisure facilities and support the health and housing services for our community, particularly the vulnerable members of the community.
- 14.2.25 An ageing and changing population and an increase in long term and complex health conditions places additional demands on health and social care and has implications for the accessibility of services and importance of preventing social isolation. We will continue to work closely with partners including the Merton CCG and NHS England to ensure that primary healthcare will be provided to meet the needs of the changing population.
- 14.2.26 The Merton Borough Health and Care Estates Strategy 2021 sets out the vision and priorities for healthcare in Merton, to align with the new Local Plan. The Strategy looks to support independence, good health, wellbeing and accessible person-centred

care, through a partnership approach across the borough. Although Merton does not have an Acute or Mental Health hospital within its boundaries, the strategic priorities of key partners have been included in the Strategy because they impact on Merton residents who attend those services.

14.2.27 The Strategy includes an up-to-date assessment of the following sites in the borough and sets out the future health priorities based on the projected population and housing growth and it has informed the Merton Infrastructure Delivery Plan 2021:

- GP surgeries.
- Primary Care Networks.
- Properties owned by NHS Property Services, Community Health Partnerships, Private landlords and other providers.

Vacant and underutilised health spaces.

14.2.28 One of the key priority areas identified in the strategy is a new Mitcham Health and Wellbeing Community Hub, which is supported by the council. The Merton Borough Estates Group has been working to bring forward plans for a new health and wellbeing space in Mitcham, as part of the priority to bring vacant and underutilised sites back into use.

Education

14.2.29 The council will continue to support new and improved childcare and education facilities in response to population changes and borough migration patterns and will work closely with partners and neighbouring boroughs where necessary to ensure that all children in Merton have access to good quality education.

14.2.30 The need for school places in Merton for children aged 0-19 years and for Special Educational Needs (SEN) is set out in the council's annual assessment of needs for state funded school places. These needs have been set out in the Infrastructure Delivery Plan and are updated every year to maintain accuracy.

14.2.31 State-funded schools include local authority-maintained schools (community, foundation and voluntary aided and controlled schools), Academies and free schools.

14.2.32 The shared use of education facilities is strongly encouraged, to ensure the effective use of a variety of community, social, educational and leisure facilities. The

sharing of facilities can help to minimise travel distances for users and can provide greater overall social benefits to the local community.

- 14.2.33 Proposals for new or improved education facilities will be expected to be designed to incorporate elements that can be shared or accessed by the wider community, outside of main school operating hours, or demonstrate why this has not been possible. Such uses can include sports and community halls, training and meeting facilities, play spaces, nurseries, children's centres, cultural or youth facilities and sports pitches and multi-use games areas.
- 14.2.34 Community use agreements may be necessary to ensure community access is properly managed and maintained. Shared access must be safe and adaptable.
- 14.2.35 Proposals for nurseries and childcare facilities should include access to an outdoor play area, of sufficient size and quality to meet the needs of the facility. This should be located away from, or be screened from, roads and other areas with poor air quality.

Policy IN14.3

Sport and Recreation

We are committed to helping our residents lead healthy and active lifestyles and improve mental well-being, through sport and recreation. We will:

- a. Encourage opportunities for sport, recreation and play.
- b. Safeguard existing sport and recreation facilities, based on assessments of need and capacity.
- c. Support proposals for new, and refurbishment and replacement of existing, sport and recreation facilities on sites that are designated as Open Space in the Policies Map, where the proposal meets Policies ~~O8.2, O8.3 and O8.4~~ O15.2, O15.3 and O15.4.
- d. Require all major residential development likely to be used by children and young people to provide on-site good quality, free-to-use, safe and accessible play spaces for all ages. The amount of play space provided is to be proportionate to the anticipated increase in child population as a result of the proposed development.
- e. Recognise the All England Lawn Tennis Club as being an internationally significant sporting venue.
- f. Ensure that all development proposals that include indoor and outdoor sports and recreation facilities maximise the multiple use of these facilities and encourage the co-location of services for the local community. This should be formalised through Community Use Agreements.

Justification Supporting Text

- 14.3.1 This policy should be considered alongside London Plan Policy S4 Play and informal recreation and S5 Sports and recreation facilities, in addition to the Green Infrastructure policies in Chapter 15 of this Local Plan.
- 14.3.2 The provision of parks, play areas, leisure, recreation and cultural facilities helps to encourage healthier, more active lifestyles and improve mental well-being and social interaction. The council is supportive of both formal and informal facilities, to encourage physical activity and deliver a range of social, health and wellbeing benefits to the local community.
- 14.3.3 We will continue to encourage regular participation in sport and recreation activities, including active travel through well designed public spaces which enable greater pedestrian and cycling movements.
- 14.3.4 The [Merton Playing Pitch Strategy \(PPS\)](#) published in 2019 provides a strategic assessment of the future demand for playing pitches and sets out the future requirements for sporting needs in the borough. The PPS was carried out in line with national guidance and in collaboration with Sport England and the National Governing Bodies of Sport (NGBs).
- 14.3.5 The PPS sets out a number of overall recommendations, including a number of sport-specific recommendations for football, rugby, cricket, hockey, tennis, bowls, athletics and water sports, which were agreed in collaboration with Sport England and the NGBs. It also includes an action plan, which is intended to guide the delivery of sports provision over the next 10 years, setting out priority projects, key actions, timescales for delivery and indicative costs by site.
- 14.3.6 The [Merton Indoor Sports Facility Study](#) (ISFS) published in 2020 provides a strategic assessment of indoor sports facilities in Merton, setting out the supply, quality and location of current facilities and considering the future needs.
- 14.3.7 Both the PPS and the ISFS should be referenced for any proposed development that includes indoor or outdoor sports facilities.
- 14.3.8 While sport and recreation facilities are generally considered to be appropriate uses on designated open spaces, these can sometimes result in conflict between users of these spaces and there are a number of considerations that need to be assessed. Proposed development will need to be well designed. Applicants must demonstrate that the location of a proposed facility has been fully considered from the beginning of the design

process, makes the best use of the land and does not adversely harm any areas of nature conservation or biodiversity.

14.3.9 Sport and recreation facilities must adopt inclusive and accessible design standards to ensure that everyone has the opportunity to take part in sporting activity, in line with relevant best practice and guidance issued by Sport England and other relevant bodies/organisations. The council is supportive of facilities that are inclusive and use accessible design, for example those that enable participation by Deaf and Disabled people.

14.3.10 In line with the Transport policies in this plan, proposed development should incorporate Healthy Streets principles through encouraging walking and cycling, to help achieve active lifestyles and improving mental well-being.

Play Space

14.3.11 Safe and stimulating play is essential for children and young people's mental and physical health. In order to facilitate greater physical activity, it is important that children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision.

14.3.12 Major residential development will be required to provide an appropriate amount of play space on site. In determining the amount of play space required, consideration will be given to the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development. The London Plan child yield calculator is to be used to determine the amount of play space required. The council also supports the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation (2008)', which emphasises the importance of providing spaces for children's play.

14.3.13 The Merton Green Infrastructure Study 2020 includes an assessment of publicly accessible play spaces in the borough, providing maps which illustrate areas of deficiency in access to children's play spaces, broken down for ages 0-4, 5-11 and 12 and over. Applicants are advised to refer to these maps in the early stages of the design process to determine whether a site is considered to be deficient in access to play space.

14.3.14 There are a variety of different types of play spaces that can be provided through new development. Communal gardens and other outdoor spaces suitable for play, including communal amenity space, may be considered to contribute towards play space provision where they have distinct playable elements. However, publicly accessible play space will be preferred where possible, rather than provision being entirely from private space.

- 14.3.15 Where formal play space is provided it must be free, accessible, and integrated into any wider networks of open space. Where possible, minor developments are also required to provide informal play space.
- 14.3.16 In line with London Plan policy S4, the council will not support play spaces that are segregated by tenure, as play areas should be accessible to all children.
- 14.3.17 New play spaces should provide an appropriate range of facilities for different age groups, including young children, older children and teenagers. Other elements such as benches and seating areas should also be provided, to enable adult supervision where necessary. Play and informal recreation areas should incorporate trees and greenery wherever possible, to create a welcoming and enjoyable environment for all.
- 14.3.18 Formal and informal play spaces are encouraged in all developments.

All England Lawn Tennis Club

- 14.3.19 The All England Lawn Tennis Club (AELTC) is the home of the Wimbledon Championships, which is a world class sporting venue of national and international significance. The council is supportive of the role that The Championships plays as a tourist, leisure, entertainment and sporting destination in the borough and will continue to support this role and the continued provision of tennis facilities in Merton.
- 14.3.20 Policy S5 of the London Plan recognises that specialist sporting venues and stadiums, such as the AELTC venue, have a vital role to play in enabling wider access to sport, as well as having an important cultural value.
- 14.3.21 Further details on the AELTC sites can be found in the Wimbledon neighbourhood policy.

Community Use Agreements

- 14.3.22 We work with many partners in the delivery of shared services across the borough, including schools, colleges, sports providers and other social and community facilities. The council is supportive of maximising the multiple use of facilities to ensure that residents in all areas of Merton can access good quality sports and recreation facilities.
- 14.3.23 The Merton PPS 2019 identifies that Community Use Agreements are an important tool in helping to secure tenure for sporting clubs and associations, which can often be problematic without formal agreements in place. The PPS recommends that

educational establishments with playing pitches should be encouraged to secure formal community use of pitches and ancillary facilities through Community Use Agreements.

- 14.3.24 The Merton ISFS 2020 identifies that residents in all areas of Merton should have pay and play access to good quality, local, accessible and affordable provision, whether it is a formal sports hall, a community hall or other informal provision. The ISFS recommends that partnership working be used to facilitate increased access to indoor sports facilities across the borough. All new sports facilities on education sites should provide a balance of pay and play and club opportunities that are available for community access. These should be formalised through Community Use Agreements.
- 14.3.25 Development proposals that include indoor and outdoor sport and recreation facilities will be expected to provide details showing how the facility will be made available to the wider community. This will be formalised through Community Use Agreements, using conditions or planning obligations, where necessary.
- 14.3.26 This is particularly relevant for schools and other social and community facilities but can also apply to commercial schemes. This is to allow and promote access to affordable sports and recreation facilities for all members of the wider local community.

Strategic Policy W14.4

Waste Management

- a. We support the objectives of sustainable waste management set out by the government in the National Planning Policy for Waste and the Mayor's London Plan.
- b. We will continue to work in collaboration with the neighbouring south London boroughs of Croydon, Kingston-upon-Thames and Sutton to maximise self-sufficiency and meet the apportionment tonnages required by the London Plan for south London. The South London Waste Plan sets out the long-term vision, spatial strategy, policies and sites for the sustainable management of waste, and a monitoring framework to assess the success of the policies.
- c. We will increase recycling rates and address waste as a resource, looking to disposal as the last option, in line with the waste hierarchy. To support recycling, the council will require integrated, well-designed waste storage facilities that will include recycling facilities for all new developments where appropriate.

Justification Supporting Text

- 14.3.28 In March 2012, the London boroughs of Croydon, Kingston, Merton and Sutton adopted the South London Waste Plan as part of each borough's Local Plans.
- 14.3.29 The South London Waste Plan provides the essential infrastructure to support housing growth in south London by safeguarding existing waste treatment sites, identifying sites and areas suitable for new waste facilities and includes planning policies that both ensure that waste arising in the boroughs are managed within the South London Waste Plan area and that new or redeveloped waste treatment facilities have the least impact on nearby uses and the environment.
- 14.3.30 In 2018, the London boroughs of Croydon, Kingston, Merton and Sutton started working on the next version of the South London Waste Plan, making the most of their strong track record and commitment to joint working and helping to deliver the new London Plan's policies and de-risk the delivery of essential infrastructure for south London. The new South London Waste Plan will address waste management needs during the 15-year period from 2024² till 2036⁷.
- 14.3.31 Waste treatment is a strategic planning issue across London and a challenge for all successful urban areas. There is a significant need for new homes in south London which generates the requirement for essential waste treatment infrastructure to support this growth. More than a million people already live in south London and there is a significant challenge in providing such essential infrastructure within a heavily urbanised area.
- 14.3.32 South London is seeking to meet this challenge by delivering its share of the London Plan's waste policies while meeting the ambitious targets for new homes in the same geographic area. The London Plan sets the target of managing 100% of London's waste within Greater London by 2026 and having zero biodegradable or recyclable waste going to landfill by 2026. It also sets targets for municipal waste, commercial and industrial waste, construction and demolition waste and excavation waste (London Plan Policy SI8).
- 14.3.33 With significant need for new homes and consequent commercial activity planned across London, the need to provide essential infrastructure such as waste facilities to meet this growth is therefore a regional strategic priority.
- 14.3.34 Details regarding the provision of suitable waste storage facilities are set out in policy D12.3 'Ensuring high quality design for all developments'.



CHAPTER 15
**GREEN AND BLUE
INFRASTRUCTURE**

Strategic Policy O15.1

Open Space, Green Infrastructure and Nature Conservation

Access to open spaces and green infrastructure plays an important role in the physical and mental health and wellbeing of all people. We aim to ensure Merton remains an attractive and green borough, through the protection and enhancement of open spaces, green infrastructure and the natural environment. We will do this by:

- a. Protecting and enhancing open spaces in the borough including Metropolitan Open Land, Open Space parks, other open spaces and Sites of Recognised Nature Conservation Interest areas of nature conservation to provide high quality environments for all residents;
- b. Protecting and seeking improvements to walking and cycling routes to and through Open Spaces green spaces;
- c. Enhancing existing Oopen S-spaces, Ggreen Ccorridors and the natural environment, providing habitats for biodiversity to flourish and expand;
- d. Protecting and enhancing the borough's Bbiodiversity, particularly on Ssites-of-Rrecognised Nnature Cconservatio Iinterest, and supporting the objectives of the Mayor's Environment Strategy;
- e. Increasing Ggreen-Iinfrastructure across the borough through Uurban Ggreening;
- f. Enhancing accessibility to our waterways, including the River Wandle and its banks, for leisure and recreational use, while protecting its Bbiodiversity value;
- g. Improving opportunities for our residents and visitors to experience nature;
- h. Promoting healthy lifestyles to encourage physical education and well-being through the use of our leisure centres, schools, open spaces, playing pitches and recreational spaces; and

Justification Supporting Text

- 15.1.1. The policies in this chapter should be read alongside ~~the London Plan policies on Chapter 8~~ Green infrastructure and natural environment (~~Chapter 8~~) and ~~Policy S5~~ Sports and recreation facilities (~~Policy S5~~) ~~of the London Plan~~ and the Infrastructure policies in Chapter 5 of this Local Plan. These policies are intended to work together to ensure that Merton's green and open spaces remain a valued asset of the borough and are protected and enhanced.
- 15.1.2. Merton is lucky to be one of the greenest boroughs in London, with over 1,300 hectares of open space, which makes up 35% of the borough. To ensure there continues to be good quality green spaces for everyone to enjoy, it will be important to protect and enhance the existing open spaces and green infrastructure in Merton. Emphasis will be placed on the protection and long-term management of open green-spaces and areas of nature conservation, and encouraging improved accessibility to these spaces. Pedestrian and cycle routes across open green-spaces often form a strategically important part of the borough's cycling and walking networks and many are designated as public rights of way. These routes enable active travel choices by connecting key destinations in the borough via convenient shortcuts and quiet routes away from busy roads. Pedestrian and cycle routes through open green-spaces should be protected and wherever possible provided to a high standard in accordance with best practice guidance.
- 15.1.3. The following evidence base documents have been published, which support the Local Plan and should be referenced for all relevant planning applications:
- The Merton Green Infrastructure, Biodiversity and Open Space Study (2020);
 - The Merton Playing Pitch Strategy (2019); and
 - The Merton Indoor Sports Facility Study (2020).

Policy O15.2

Open Space and Green Infrastructure

We place a high value on green infrastructure and open spaces, as they make a significant contribution to the health (including mental health) and wellbeing of Merton residents, contribute to social cohesion and mitigate some of the impacts of climate change. We aim to protect and enhance our open spaces and to improve accessibility to open space. We will:

- a. Protect and enhance the borough's public and private open space network including protecting Metropolitan Open Land (MOL) and designated **O**pen **S**paces from inappropriate development in accordance with the London Plan and government guidance.
- b. Ensure that in accordance with the NPPF, existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
 - i. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - ii. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - iii. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- c. Ensure that development proposals within designated **O**pen **S**paces (which have met the conditions set in part b) above, meet all the following criteria:
 - i. the proposals are of a high quality design and do not harm the character, appearance or function of the open space and;
 - ii. the proposals retain and/or improve public access between existing public areas and open spaces through the creation of new and more direct footpath and cycle path links; and,
 - iii. the character and function of leisure walks are preserved or enhanced.
- d. Require the creation of new publicly accessible open space as part of major development proposals in locations that are deficient in access to public **O**pen **S**pace and support the creation of new publicly accessible open space in all developments, where suitable and viable.
- e. Expect development to incorporate and maintain appropriate elements of **G**reen **I**nfrastructure which makes a positive contribution to the wider network of **O**pen **S**paces.
- f. Safeguard existing allotments, and encourage and support opportunities for community run and managed food growing spaces in new developments.
- g. Expect all development to make provision for the long term management and maintenance of open space and green infrastructure on site.

Justification Supporting Text

- 15.2.1. Open Sspace can be multi-functional; people use green and open spaces for many purposes including exercise, play, food growing, socialising and leisure. Visual accessibility is equally as important as physical access. The protection and enhancement of open spaces enables the provision of areas for active and passive leisure activities, has a positive impact on health and wellbeing, provides opportunities for social cohesion between members of Merton's diverse communities, provides safe pedestrian and cycle routes, provides areas for nature within urban areas and can provide areas for flood mitigation measures. Open Sspaces and Green Infrastructure can also play a role in enhancing and conserving the historic environment.
- 15.2.2. The 2020 Merton Green Infrastructure, Biodiversity and Open Space Study (referred to as the Green Infrastructure Study) provides an assessment of open space quality, quantity and accessibility throughout Merton, including an audit of existing open spaces to determine the likely demand and need for facilities over the lifetime of the Local Plan.
- 15.2.3. The Green Infrastructure Study identifies that Merton is one of the greenest boroughs in London, with over 1,300 hectares of open spaces, accounting for 35% of the borough. 21% of this is public open space, slightly more than the 18% in London.
- 15.2.4. The coronavirus (COVID-19) pandemic has highlighted the importance of having access to green spaces within walking distance of homes. During the pandemic, visits to parks and other green spaces increased across London. It is important to protect and enhance the existing areas of open space in Merton, to ensure that as the population grows, there are good quality green spaces for everyone to enjoy.

Metropolitan Open Land

- 15.2.5. Metropolitan Open Land (MOL) is strategic open land that contributes to the structure of London. It is afforded the same status and protection as Green Belt land. As shown on the Policies Map, there are 9 designated areas of MOL in Merton, covering over 950 hectares, or 26% of the borough. MOL will continue to be protected from inappropriate development, in accordance with ~~the~~ London Plan Policy G3 and NPPF paragraph 147 government guidance.

Designated Open Spaces

- 15.2.6. The Open Sspaces relevant to this policy are designated on the Policies Map. These typically consist of parks, commons, playing fields, play areas, cemeteries and churchyards, woodlands and allotments. We are committed to ensuring the protection and enhancement of designated Open Sspace.

- 15.2.7. Many designated **Open Spaces** have existing buildings within them, particularly when associated with leisure and sports facilities. Proposals for new or improvements to existing buildings on **Open Space** that meet the criteria in the policy should be of high quality design, and of a scale, height and massing that is appropriate to their setting. Proposals should show how uses are required and linked to the function of the open space and all proposed uses should complement and enhance the function of the open space (e.g. pavilions and changing rooms that are required for playing pitches).
- 15.2.8. For clarity, the assessment that is referred to in part (b)(i) of this policy is a strategic borough-wide assessment such as the Merton Green Infrastructure Study 2020, the Merton Playing Pitch Strategy 2019, or the Merton Indoor Sports Facility Study 2020, not assessments that are done on a site by site basis.

Improving accessibility to public **Open Space**

- 15.2.9. The Green Infrastructure Study includes an accessibility assessment to analyse areas in the borough that are deficient in access to public open space, play areas and nature conservation, and maps are provided for each. The areas of deficiency in access to public open space are calculated by Greenspace Information for Greater London (GiGL) using their Areas of Deficiency (AoD) data model. Public open space categories are set out in the London Plan [table 8.1](#) and provide a benchmark for the provision of publicly accessible open space, categorising spaces according to their size, facilities and local importance.
- 15.2.10. Residents in Merton experience high accessibility to Regional Parks (98%) and Metropolitan Parks (99%). There is also a good level of accessibility to District Parks (77%) and Local Parks (72%). There is a notable gap in access to District Parks indicated by a continuous band of deficiency from west to north east through Raynes Park, Wimbledon, Colliers Wood and Mitcham.
- 15.2.11. The best reflection of deficiency in access to open space is to the Local Parks, Small Open Spaces and Pocket Parks. In these areas of deficiency the lack of open spaces is more evident, although there is some evidence of existing open space which is not publicly accessible. There are some areas (particularly noticeable around Raynes Park) where there are gaps in access to both District and Local Parks. Major developments proposed in these areas will be required to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site. New public access routes should be designed to be accessible by all people. Where necessary, planning obligations may be sought to secure access improvements. Applicants are advised to consult the areas of deficiency maps provided in the Green Infrastructure Study for consideration as part of the design process.

- 15.2.12. Where necessary, to fund any costs to the council associated with onsite provision of new open space proposed as part of major developments, commuted sums may be negotiated on a case by case basis and the level of funding sought will be commensurate to the financial burden to the council that would arise due to the open space provision.
- 15.2.13. A large number of open space in Merton are linked by rivers, brooks and smaller open spaces, or are separated from one another by short sections of built development. This can limit the accessibility to and between open spaces. New development in these areas should explore opportunities to enhance the accessibility between these spaces, in line with the principles set out in the All London Green Grid guidance and London Plan Policy SI16(F). Improvements in accessibility should be delivered in tandem with the Transport policies.
- 15.2.14. It is important to protect and improve the existing links between and across open spaces. These links provide important informal recreational opportunities for walking and cycling, create a safe and pleasant environment, and allow appreciation of attractive landscapes and features of historical significance.

Green **I**nfrastructure

- 15.2.15. Green **I**nfrastructure refers to the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems.
- 15.2.16. All development will be expected to incorporate elements of **G**reen **I**nfrastructure on site, to enhance biodiversity, contribute to the health and wellbeing of all residents and help mitigate the impacts of climate change. Examples include pollinator-friendly landscaping, tree-planting, green walls, green and blue roofs and rain gardens all of which can have multiple benefits. Reference should also be made to the Local Plan Policies on Biodiversity and Nature Conservation (O15.3), Protection of Trees (O15.4) and Urban Greening (O15.5).

Allotments and Food Growing

- 15.2.17. Local food growing can help to create healthier food environments, improve food security, promote healthy and active lifestyles and help to improve social and community cohesion. Allotments **and orchards** are areas set aside for food growing and are recognised for their contribution to enabling healthy and sustainable lifestyles. These green spaces not only offer biodiversity and conservation value but also bring recreational, health and social benefits, by allowing residents to grow fresh produce.

- 15.2.18. The Green Infrastructure Study identifies there are 21 allotments in Merton; 19 of which are Council owned and the other 2 privately owned. It is important that allotments continue to be protected, while new spaces for growing food are also encouraged.
- 15.2.19. New proposed developments may provide ideal opportunities to incorporate spaces for residents to grow food. This does not have to be in formal allotment areas, but could extend to roofs, walls and balconies or by introducing trees and shrubs that produce food as part of the landscaping. It may be appropriate for areas to be used temporarily for food growing, provided it does not conflict with other policy objectives or land use priorities and does not have an unacceptable impact on the amenity of adjoining areas.
- 15.2.20. Food growing in schools can also help children's learning and skills, in addition to wider health and wellbeing outcomes.

Policy O15.3

Biodiversity and Access to Nature

We are committed to protecting and enhancing the natural environment. We aim to protect and enhance **B**iodiversity, particularly on **S**ites-of-**R**ecognised **N**ature **C**onservation **I**nterest, and to improve accessibility to nature throughout the borough. We will:

- a. Protect all **S**ites-of-**R**ecognised **N**ature **C**onservation **I**nterest against inappropriate development that will adversely affect the nature conservation value of the site, and secure measures that enhance their nature conservation value;
- b. Protect and avoid damage to **S**ites-of-**R**ecognised **N**ature **C**onservation **I**nterest, populations of protected species, priority habitats and priority species;
- c. Protect Green Corridors from development which may destroy or impair the integrity of the Green Corridor.
- d. Require development to contribute to net gains in **B**iodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links. Where development is adjacent to or includes a river, natural banks must be restored with a 10m buffer included.
- e. Require the following mitigation hierarchy to be followed, for development where significant harm to **B**iodiversity is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on **B**iodiversity:
 - i. Avoid damaging the significant ecological features of the site
 - ii. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - iii. Deliver off-site compensation of better **B**iodiversity value.
- f. Expect all development on sites found in an area of deficiency in access to nature to incorporate appropriate **B**iodiversity elements and habitat features to improve nature conservation, and to improve accessibility to SINC's through site design.

Justification Supporting Text

- 15.3.1. Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on public authorities to have regard to the purpose of conserving biodiversity, through policy and decision making.
- 15.3.2. We are committed to protecting and enhancing biodiversity, particularly on Sites of Recognised Nature Conservation Interest. The protection and enhancement of biodiversity in urban areas such as Merton is important, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature. Protecting biodiversity and the wider natural environment can have a variety of significant positive impacts including strengthening wildlife movement and connections, improving health and mental wellbeing of residents, contributing to climate change adaptation and improving quality of life.
- 15.3.3. For clarity, reference in this policy to Sites of Recognised Nature Conservation Interest include all sites that are designated on the Merton Policies Map as:
- Sites of Special Scientific Interest (SSSI);
 - Metropolitan, Borough or Local Sites of Importance to Nature Conservation (SINC);
 - Local Nature Reserves (LNR); and
 - Green Corridors.
- 15.3.4. Development proposals which are likely to affect sites that have been designated on the Policies Map as SSSI, SINC, LNR or Green Corridor will be required to demonstrate that such development will not adversely affect the nature conservation values of the site. Any proposals on adjoining sites will also need to ensure and demonstrate that the proposed development will not harm the nature conservation value of the designated site.
- 15.3.5. In line with the NPPF and London Plan Policy G6, significant harm to biodiversity on a site through proposed development should be avoided. In circumstances where harm is unavoidable, the mitigation hierarchy will be applied. It will be expected that where any mitigation or compensation is required, this will be provided at the equivalent, or better, biodiversity and habitat area and value.
- 15.3.6. The preservation of existing biodiversity, including wildlife habitats, is strongly preferred over re-provision as any redevelopment of an existing space will necessitate its total loss and replacement with a space that has to be established with plants and wildlife over time; this carries the risk that the replacement space will be less successful than that which it replaces.

Sites of Special Scientific Interest / Special Areas of Conservation – Wimbledon Common

- 15.3.7. Wimbledon Common is the only SSSI in the borough and this area is also protected by European legislation as a Special Area of Conservation (SAC). The Habitats Regulations require an 'Appropriate Assessment' to be carried out if a plan or project is likely to have a significant effect on Wimbledon Common (either alone or in combination with other plans or projects). This may apply to development projects and this is not the same as an Environmental Impact Assessment. The Natural England website has more information to help decide whether or not a development project requires an 'Appropriate Assessment'.

SINCs

- 15.3.8. There are 56 SINCs in Merton, covering an area of 833 hectares (22% of the borough). Proposals on, or in close proximity to SINCs should have a positive impact on biodiversity and will be assessed in accordance with London Plan Policy G6.

Local Nature Reserves

- 15.3.9. There are 15 LNRs in Merton; areas that have been statutorily designated under Section 21 of the National Parks and Access to the Countryside Act 1949. These are places that are considered to be important for wildlife, geology, education and enjoyment by local people. Public access to LNRs is important, provided that people visiting the site will not damage or disturb the wildlife.

Protected **S**pecies, **P**riority **H**abitats and **P**riority **S**pecies.

- 15.3.10. Although Merton is a built-up area in London, it is still home to many protected species and habitats that are valuable to biodiversity. While trees and green spaces provide habitats for many species, buildings can also provide roosting sites for bats and nesting opportunities for birds. Biodiversity should be considered at the early stages of the design process, as the benefits of creating spaces for wildlife also have significant positive impacts for the health and wellbeing of local residents.
- 15.3.11. Wildlife in the UK is protected under the Wildlife and Countryside Act 1981 (as amended). Applicants should check that wildlife and protected species will not be affected by a proposed planning application. The Natural England standing advice on protected species should be referred to for any development proposal on a site that may impact on a protected species, priority habitat or priority species. Any development that is located within or in close proximity to a SINC or is likely to have an impact on protected species, habitats or priority species, will be required to submit an ecological survey and appraisal. This is to ensure that we can make an informed decision to protect and enhance biodiversity.

- 15.3.12. Ecological surveys submitted with planning applications should be in line with the Natural England standing advice on protected species and:
- be carried out by an appropriately qualified ecologist
 - be carried out at an appropriate time of year and no later than 6 months prior to the submission of the planning application;
 - use appropriate methods for the species and the area;
 - be carried out early in the design process of a proposal;
 - identify any potential impacts a proposed development is likely to have on the ecology of a site; and
 - recommend suitable mitigation and enhancement measures for the proposed development.
- 15.3.13. Development proposals must consider the potential impact that lighting, noise or shading may have on biodiversity on and around the site. New proposed lighting should minimise impacts to biodiversity, protected species and priority habitats.
- 15.3.14. Any works that would affect breeding birds and their nests, such as works of demolition, vegetation removal or site clearance, will need to be done outside the nesting season from 1st of March to 31st July inclusive (in accordance with the Natural England standing advice on wild birds).

Green Corridors

- 15.3.15. Green Corridors are continuous areas of open space, which link other open spaces to each other, allowing animals and plants to move in and around built-up areas. There are 18 Green Corridors designated on the Policies Map, covering an area of 1,023 hectares (27% of the borough).
- 15.3.16. We recognise the importance of maintaining and enhancing the network of Green Corridors. These areas effectively create corridors that enable the movement of plant and animals. They allow some animals to undertake movements between different habitats that they require for survival, maintain the presence of some animals and plants in places where they would not otherwise be found, and help to ensure the maintenance of the current range and diversity of flora and fauna, and the survival of important species.
- 15.3.17. Proposed development on sites in and in adjacent to Green Corridors will need to consider biodiversity, wildlife and **Green Infrastructure** elements early on in the design process. This includes considering and mitigating against any potential impacts on biodiversity from elements such as lighting, noise or shading. Lighting can have negative impacts on birds, roosting bats and bats that are feeding or commuting to feeding areas.

Net Gain

- 15.3.18. Biodiversity net gain is an approach which aims to leave the natural environment in a better state than it previously was. Development proposals should maximise biodiversity benefits and ecological connectivity through ensuring that biodiversity is a key consideration early in the design process.
- 15.3.19. Development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the NPPG 2019 (para 023) these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications and should follow best practice guidance, including that prepared by the [Chartered Institute of Ecology and Environmental Management](#).
- 15.3.20. Development proposals should prioritise the inclusion of Bbiodiversity on-site, selecting species for planting that complements that surrounding habitats, maximises benefits to biodiversity and is beneficial to wildlife.
- 15.3.21. Improvements to biodiversity should not be restricted to conventional habitats but should extend to the increased use of green roofs and green walls. The use of sustainable drainage measures can also have significant biodiversity benefits – refer to Policy F15.8 and the [Merton SUDs SPD](#) for further guidance.
- 15.3.22. In view of the [Environment Bill 2020](#), applicants are expected to prepare planning applications using the latest [good practice guidance for biodiversity net gain](#).

Areas of Deficiency in Access to Nature

- 15.3.23. There is generally good access to green spaces and nature conservation areas in Merton, however some parts of the borough are considered to be deficient in access. For clarity, areas of deficiency in access to nature are areas where people have to walk more than 1km to reach a publicly accessible metropolitan or borough SINC. These areas have been identified and mapped in the Merton Green Infrastructure Study 2020. These maps are regularly updated by GiGL and should be referred to when preparing planning applications.
- 15.3.24. Major development proposals on sites that are located in these areas of deficiency will be expected to alleviate these deficiencies. We will support improvements in accessibility to

SINCs in areas of deficiency through all developments, where this is possible and practical.

Geodiversity

- 15.3.25. There are no regional or locally important geological sites in Merton. However, there is a site on Putney Heath, approximately 160 metres from the borough boundary in Wandsworth, which is a site of local importance. Development proposals that could have an impact on the geological features of this site should have regard to London Plan Policy G9.

Policy O15.4

Protection of Trees

We are committed to protecting trees and enhancing other features of the natural environment. We will:

- a. Encourage and support the protection of street trees, and secure replacements utilising current technological advancements for the successful growth and establishment of trees;
- b. Ensure that development proposals protect and retain trees, hedges and other landscape features of amenity value, on site and on adjoining land, wherever possible, and secure suitable replacements in instances where their loss is justified;
- c. Expect development proposals, where appropriate, to plant additional trees on site in a coordinated way to maximise the green infrastructure network and to increase the borough's tree canopy;
- d. Use Tree Preservation Orders to safeguard significant trees of amenity value;
- e. Only permit development if it will not damage or destroy any tree which:
 - i. is protected by a Tree Preservation Order;
 - ii. is within a conservation area; or,
 - iii. has significant amenity value.

However, development may be permitted when:

- iv. The removal of the tree is necessary in the interest of good arboricultural practice; or
- v. The benefits of the development outweigh the tree's amenity value.

In circumstances where e) iv. or v. applies, suitable high-quality re-provision of equal value must be provided on site. Where on site provision is demonstrably not possible, as agreed with the council, a financial contribution of the full cost of appropriate re-provision will be required.

- f. Expect proposals for new and replacement trees, hedges and landscape features to consist of appropriate native species to the UK.
- g. Require developers to ensure that bio-security measures are adhered to for trees, shrubs and herbaceous plants to prevent accidental release of pests and diseases.

Justification Supporting Text

- 15.4.1. Trees, hedges, shrubs and other significant vegetation make an important contribution to the borough's townscape and the quality of life for residents. These elements provide visual and amenity enhancements to the built environment, while also providing much needed habitats for **B**biodiversity. Trees, and in particular mature trees, can help to reduce impacts on air quality and contribute to climate change by capturing and storing carbon dioxide. Trees will continue to play a significant role in adapting to climate change by having a positive impact on reducing flood risk and helping to reduce the urban heat island effect.
- 15.4.2. The Green Infrastructure Study 2020 identifies that although Merton has an overall tree canopy cover that is greater than the London average, a sustained expansion of tree and woodland planting is important. This is needed to address ongoing biodiversity declines, increase resilience to pests and diseases, increase shade and tackle climate change. The Study identifies the total tree canopy, including in private gardens, covers an area of 1,040 hectares, approximately 28% of the borough. There are different techniques for estimating tree and woodland coverage, but of the total tree canopy: 266.1 hectares (26%) consists of woodlands contained within parks and public open spaces; 15.2 hectares (1.5%) consists of individual woodlands; 116.7 hectares (11.2%) consists of street tree (canopy); and the remainder (61.3%) is found in private gardens, cemeteries and institutional grounds. London's tree coverage is estimated to be 20% and the London Environment Strategy has set a target to increase this by 10% by 2050.
- 15.4.3. We are supportive of the protection and retention of trees on development sites, as this will help to provide a platform to expand the borough's tree canopy. When considering the amenity value of a tree, we will look at Category A, B and lesser category trees where they are considered to be of importance to amenity and biodiversity, as defined by BS 5837:2012 (in accordance with the London Plan G7C).
- 15.4.4. There will be an expectation for proposals to also provide new trees on site, to help add to the borough's tree canopy. While it is recognised that individual site constraints may mean this is not possible on every site, applicants will be expected to demonstrate they have considered the provision of new trees as part of their design concepts.
- 15.4.5. We will use the existing planning mechanisms including Tree Preservation Orders and Conservation Area designations to protect existing trees on private land.
- 15.4.6. In line with the NPPF and London Plan Policy G7, ancient woodland areas and veteran trees should be protected from development. These are irreplaceable habitats and form a key component of green infrastructure, helping to create resilient and sustainable places to live. Any proposed development in the vicinity of these protected areas should seek guidance prior to submitting a planning application. Further guidance on the protection of

ancient woodland and veteran trees can be accessed via the Forestry Commission or The Woodland Trust.

- 15.4.7. We consider it important that development proposals are accompanied by appropriate reports and surveys to deal with the impact of the proposals on the existing vegetation. We assess trees within the scope of BS 5837:2012. When applicable, developers will need to demonstrate that they have paid regard to current British Standards such as, BS 5837:2012 'Trees in relation to design, demolition and construction - Recommendations', BS 3998:2010 'Tree Work – Recommendations' and other relevant documentation such as the Arboricultural Advisory and Information Service's 'Arboricultural Practice Note 12'.
- 15.4.8. New development should be designed positively to integrate existing trees. For trees that are located on a proposed development site, the appropriate arboricultural information should be provided to demonstrate that layouts have been informed by the use of such survey and tree constraints mapping information. If a tree is proposed to be removed, applicants will be expected to show that they have considered alternative design layouts and provide reasons why these layouts were not brought forward.
- 15.4.9. Tree planting should be considered from the design stage of a proposal. The location of new trees should be planned to complement proposed features, have an appropriately sized tree pit, be bio-secure and be appropriate for the intended use, of the development. We may request details relating to the planned maintenance for new trees and landscaping on development sites, to ensure planting becomes established, particularly within the first five years. Planning conditions will also be used, as appropriate.
- 15.4.10. All developments are required to minimise impacts on existing trees, hedges, shrubs and other significant vegetation, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development.
- 15.4.11. In those exceptional circumstances where the loss of or damage to trees of value is unavoidable, mitigation through adequate planting will be secured. As set out in London Plan G7C, recognised valuation systems should be used to inform suitable replacement planting based on the existing value of the benefits of the trees removed. Examples of such valuation systems include i-tree and CAVAT. We will require applicants to provide this information as part of the arboricultural report submitted with the planning application.
- 15.4.12. Planning conditions will be used for any development proposals where a replacement tree is required. Section 106 planning agreements may also be used, in circumstances where a payment in lieu is required.
- 15.4.13. Where there are constraints to planting and re-planting cannot occur on-site, or only partial canopy cover can be re-provided, the development will be required to provide

evidence to justify why it is not feasible. Once this is established to our satisfaction, it may then be accepted that off-site compensation is appropriate, or that a financial contribution of the full cost of appropriate re-provision is required. The preference will be to prioritise planting over a financial contribution, unless there are exceptional circumstances in relation to compliance with other policy requirements.

- 15.4.14. Underground servicing often affects existing trees and/or can limit where new trees are located. Proposals involving existing and/or proposed underground servicing must ensure that the requirements for protecting existing trees and proposing new trees are fully considered.
- 15.4.15. Although exotic species can have interesting aesthetic qualities, they can also have a damaging impact on biodiversity and the local ecology. We have a strong preference for native species to be planted but, where appropriate, will consider suitable exotic species. Species selection should also be appropriate for the site location and local conditions, taking into account a changing climate. Fruit trees will be supported, as these can provide a variety of benefits.
- 15.4.16. We will take appropriate measures to prevent or reduce the risk of transmission of emerging pests, diseases and invasive species that are detrimental to the health of trees. With the advent of introduced pests, such as the Oak Processionary Moth (*Thaumetopoea processionea*) and diseases such as Ash Dieback (*Chalara fraxinea*), trees, shrubs and herbaceous plants should follow BS8545: Trees: From Nursery to independence in the Landscape. This includes that trees should not be imported directly from European suppliers and planted straight into the landscape setting but spend a full growing season in a British nursery to ensure plant health and non-infection by foreign pests and diseases before being introduced into a development. Landscape conditions will be used to ensure that good practice is exercised as detailed by LTOA and the Forestry Commission.

Policy O15.5

Urban Greening

We are committed to ensuring that new development incorporates green infrastructure, to help create healthier places, enhance biodiversity and address the urban heat island effect. We will:

- a. Require major developments to incorporate Uurban Greening through site and building design, by:
 - i. Conducting an Urban Greening Factor (UGF) assessment in accordance with the methodology set out in the London Plan;
 - ii. Achieving an UGF of 0.4 for developments that are predominantly residential;
 - iii. Achieving an UGF of 0.3 for developments that are predominantly commercial.
- b. Require all developments to consider Green Infrastructure at an early stage of the design process and incorporate this as part of an integrated design approach.
- c. Strongly encourage the inclusion of Uurban Greening for all other development in Merton.

Justification Supporting Text

- 15.5.1. Urban **Greening** describes the incorporation of **Green Infrastructure** elements into a development, such as vegetation, trees, green roofs, green walls, hedgerows and water features. There can be multiple benefits to including these features in new development including improved physical and mental wellbeing, biodiversity and habitat enhancements, improved air quality, water attenuation, carbon storage, improved visual amenity and helping to address the urban heat island effect.
- 15.5.2. London Plan Policy G5 includes a London wide UGF model to assist boroughs and developers in determining the appropriate provision of **Urban Greening** for new developments. We will use the London wide model in the determination of planning applications but may in time develop a local model through further GLA and local supplementary guidance.
- 15.5.3. The Merton Green Infrastructure Study 2020 includes a technical report which assesses the quantity and quality of green and blue infrastructure throughout Merton. The report identifies that there are only a small number of green roofs in Merton representing less than 0.1% of all green and blue infrastructure. This policy will help to ensure that higher levels of **Green Infrastructure** are provided on development sites through the use of urban greening features such as green roofs and walls, helping to enhance biodiversity and create healthier places.
- 15.5.4. Merton Council declared a Climate Emergency in July 2019 and is working towards the implementation of a Climate Action Plan that will set out the strategic approach to reducing carbon emissions in the borough. One of the key action areas identified to help the borough become carbon neutral is enabling green space across Merton to capture carbon from the atmosphere. By ensuring that new developments incorporate **Urban Greening**, **Green Infrastructure** will improve across the borough and help to mitigate the impacts of climate change such as overheating, flooding and loss of biodiversity.
- 15.5.5. As set out in the Climate Change policies, development proposals will be required to demonstrate they are well designed, fully adaptable and resilient to the impacts of a changing climate. **Urban Greening** should be incorporated into the design of new development to assist in mitigating the risk of overheating and adverse impacts on the urban heat island effect.
- 15.5.6. All applicants will be expected to consider **Green Infrastructure** at the earliest possible stage of the design process and take every opportunity to incorporate urban greening elements into their development. This should be clearly shown through the Pre-Application process.
- 15.5.7. Applicants will be required to provide the following information:

- Appropriate information which provides sufficient detail on the type(s) of **Green Infrastructure** proposed;
- Justification indicating why the type(s) of **Green Infrastructure** have been proposed for the development;
- The UGF calculation and score; and
- Appropriate information on how the urban greening elements will be maintained and managed over the lifetime of the development.

15.5.8. Urban **Greening** is not only relevant for major development sites. Given that a large proportion of development that will come forward over the Local Plan period will be on small sites, it will be important that these sites also contribute to the provision of additional **Green Infrastructure** in the borough. Planning applications submitted for small sites will be strongly encouraged to incorporate **Urban Greening** on site as part of a development. While there are many ways this can be done, three examples include creating greener front gardens, using capillary matting instead of hard standing for car parking areas and increasing the overall amount of vegetation on site. Further information is provided in Merton Council's Small Sites Toolkit.

Policy O15.6

Wandle Valley Regional Park

We are committed to protecting the Wandle Valley Regional Park and maintaining it as a strategic, biodiverse and accessible corridor through the borough. We will:

- a. Support the Wandle Valley Regional Park as one of London's major green networks, protecting biodiversity and supporting opportunities for formal and informal recreation through enhanced accessibility.
- b. Protect and enhance the River Wandle, including its green and blue infrastructure, biodiversity and wildlife corridors.
- c. Support opportunities for green infrastructure improvements to the Wandle Valley Regional Park and along the River Wandle.
- d. Support the protection and completion of the Wandle Trail.
- e. Require development within 400m of the Wandle Valley Regional Park boundary to consider its relationship to the park in terms of visual, physical and landscape links, and ensure that new development positively enhances accessibility to the park through improvements to walking and cycling.
- f. Expect all new development within 400m of the Wandle Valley Regional Park to provide green infrastructure elements on site through Urban Greening.
- g. Work with the Environment Agency, Thames Water, the Greater London Authority, landowners and developers to implement flood risk reduction measures which include Green Infrastucture, that manage river and surface water flooding while delivering wider benefits for water and air quality, people and wildlife.
- h. Encourage the celebration of the Wandle Valley Regional Park through community celebrations, arts, cultural events and sporting activities that will support and promote tourism and recreation in Merton.
- i. Work with neighbouring boroughs and relevant bodies to support and encourage increased accessibility through the Wandle Valley Regional Park.

Justification Supporting Text

- 15.6.1. The Wandle Valley Regional Park is made up of a number of sites that run along or nearby to the River Wandle. These spaces, particularly the Wandle Trail, are especially important for the quality of life of residents in Merton, positively contributing to their health and wellbeing.
- 15.6.2. For the purposes of this document, the Wandle Valley Regional Park is taken to mean the areas of land in the borough which correspond to the area defined in the All London Green Grid Wandle Area Framework, as shown on the Policies Map.
- 15.6.3. The Wandle Valley Regional Park Trust was established in 2012 to provide leadership and coordination of a sub-regional partnership to improve the effectiveness, coherence, resilience and quality of the Wandle Valley Regional Park. The 2016-2021 Strategy identifies the Wandle Valley Regional Park as a strategically important asset for London. The Trust supports the promotion of the park not just as a collection of green spaces, but as an interconnected system that can benefit communities living and working in the wider Wandle Valley area.

Green infrastructure and biodiversity functions

- 15.6.4. The Wandle Valley Regional Park is one of the largest strategic green links in south west London. Rather than a single area of open land, the park is made up of a green grid of connected spaces with visual or physical links to the current or historic route of the River Wandle.
- 15.6.5. The Wandle Valley Regional Park enables improved access to a linked network of open spaces, including parkland, wildlife areas, riverside walks and facilities for children and young people, which increases the quality of the environment and contribute to the identity of the valley as a place to live, work and visit.
- 15.6.6. The River Wandle forms part of London's network of waterways, also known as the Blue Ribbon Network in the London Plan. It is an important green corridor for species movement throughout south west London with a number of protected species found along its length. Biodiversity and wildlife should be protected and enhanced along the waterways. In line with the other green infrastructure policies, applicants will be expected to demonstrate that proposed development will not have a significant adverse effect on Protected Species or Priority Species and Priority Habitats.
- 15.6.7. For development within 400m of the Wandle Valley Regional Park, an increase in green cover through the provision of elements such as high-quality landscaping, trees, green roofs, green walls and nature based sustainable drainage will help to strengthen the

Wandle Valley Regional Park as a network of green and open spaces, while also enhancing biodiversity.

Accessibility

- 15.6.8. The Wandle Valley Regional Park is a place for healthy living, enhancing physical and mental health by improving access to good quality public realm and green spaces.
- 15.6.9. The [Wandle Trail](#) is an established footpath and cycle way, providing a 12 mile (20 km) strategic green route that offers the enjoyment of a variety of chalk stream heritage, flora and fauna. Predominantly following the River Wandle, the trail runs between East Croydon station to the Thames Path in Wandsworth, crossing through Merton with a section of the trail in the north of the borough forming part of the national cycle network route 20. The Wandle Trail links key destinations in the borough and beyond, via convenient shortcuts and quiet routes away from busy roads. It forms a strategically important part of the borough's cycling and walking network that plays a vital role in enabling active travel choices.
- 15.6.10. While most sections are in a good condition, there are some missing links and areas that will require future investment and improvement to enable a continuous trail that is fully accessible to all users, at all times of the year. We support the [protection and](#) completion of the Wandle Trail, including the identified improvements in access required in the north east of the borough, near Earlsfield. This will complete a missing link, and provide a safer, quieter and more pleasant alternative route for cyclists and pedestrians to the busy Durnsford Road bridge. Any improvements here would need to be agreed with the neighbouring borough of Wandsworth. Investment in the Wandle Trail should respect the character of the river's environs and be designed for pedestrian and cycle access.
- ~~15.6.11. The Wandle Trail is an established footpath and cycle way, providing a 12 mile (20 km) strategic green route that offers the enjoyment of a variety of chalk stream heritage, flora and fauna. Predominantly following the River Wandle, the trail runs between East Croydon station to the Thames Path in Wandsworth, crossing through Merton.~~
- ~~15.6.12. While most sections are in a good condition, there are some missing links and areas that will require future investment to enable a continuous trail. We support the completion of the Wandle Trail, including the identified improvements in access required in the north east of the borough, near Earlsfield. Any improvements here would need to be agreed with the neighbouring borough of Wandsworth. Investment in the Wandle Trail should respect the character of the river's environs and be designed for pedestrian and cycle access.~~
- 15.6.13. Improvements to wayfinding and signage along the Wandle Trail and throughout the Wandle Valley Regional Park are welcomed, as these will help to increase accessibility

and encourage more residents and tourists to visit. Access points and trails should be inclusive and provide access for all.

- 15.6.14. Proposed development along the Wandle Trail and within the Wandle Valley Regional Park should seek to enhance accessibility for pedestrians and cyclists through providing safe, welcoming and inclusive environments that will encourage active transport.
- 15.6.15. There are also future opportunities for the Wandle Valley Regional Park to incorporate a large area of open space stretching from Mitcham Common and Three Kings Piece to Beddington, in the neighbouring borough of Sutton. We will continue to work with the relevant bodies to support the expansion of this green space and enable access to and from the borough.

Development within 400m of the Wandle Valley Regional Park

- 15.6.16. The Wandle Valley Regional Park is a significant blue and green corridor that offers a range of visual, physical and health benefits to residents and visitors.
- 15.6.17. All applications for development within 400m of the Wandle Valley Regional Park, as identified on the Policies Map, will be required to show how the visual, physical and landscape links to the park have been considered for the design of the development. This should include details in the Design and Access Statement showing how the relationship between the proposed development and the Wandle Valley Regional Park has been considered in the design of the built form and access to the site. This is to ensure access to the Wandle Valley Regional Park is protected and enhanced, promoting sustainable travel options and healthier lifestyles.
- 15.6.18. Our aspiration is for new development to complement the existing **Green Corridors**. As outlined in our transport policies, development proposals should enhance or enable new walking and cycling connections and networks to the Wandle Valley Regional Park, including the Wandle Trail. Physical barriers such as railings and built form that disrupts continuity and access into and around the park should be removed through the design of new development.
- 15.6.19. Proposals that restrict or block off existing access to the Wandle Valley Regional Park will not be supported unless it can be demonstrated that alternative and better quality access will be provided.

Recreation and cultural functions

- 15.6.20. The areas that make up the Wandle Valley Regional Park are key cultural and recreational attractions for the borough, as well as being vital green and blue assets delivering a wide range of benefits. The vibrant mix of leisure and recreation

opportunities, such as Morden Hall Park, Deen City Farm and Watermeads Nature Reserve attracts both local residents and visitors. These attractions are significant for the borough as they help to promote tourism and celebrate the cultural features of the area.

15.6.21. Tourism and recreation activities throughout the Wandle Valley Regional Park are encouraged, particularly where activities can promote active and healthy lifestyles.

15.6.22. Proposals should make use of, and improve access to, existing cycling and pedestrian routes in the Wandle Valley Regional Park and encourage sustainable commuting patterns for tourism and recreation activities.

Other

15.6.23. There are a number of overhead network power cables within the area surrounding the Wandle Valley Regional Park which include 20 pylons on the Beddington to Wimbledon overhead. We will support the relocation of existing power lines, pylons and other visually intrusive servicing as part of planning agreements in relation to new developments where it is technically, practically, environmentally and economically viable. This will be dependent on agreements being made between landowners and the relevant infrastructure providers.

Strategic Policy F15.7

Flood Risk Management and Sustainable Drainage

As a Lead Local Flood Authority, we will work in partnership with the Environment Agency, water companies, developers, neighbouring boroughs and local communities to manage and reduce flood risk from all sources. We will:

- a. Steer development towards areas at lowest risk of flooding from all sources through the application of the sequential test as set out in the NPPF and supporting national Planning Practice Guidance. Assess the cumulative impact of development and land use change and make strategic planning decisions using the most up-to-date flood risk data and information from Merton Council, the Environment Agency, other Risk Management Authorities (RMAs) and the National Flood and Coastal Erosion Risk Management Strategy for England (2020).
- b. Implement the recommendations and objectives of Merton's flood risk management plans, such as the [Strategic Flood Risk Assessment \(SFRA\)](#), Local Flood Risk Management Strategy and other RMAs, flood risk management plans.
- c. Require all developments to incorporate flood resilience measures and be adaptable to the future impacts of climate change.
- d. Ensure all major development includes water efficiency measures such as rainwater harvesting or grey water recycling to minimise water consumption, and SUDS (Sustainable Drainage Systems) to deliver multi-functional benefits such as managing surface water runoff, improving biodiversity, providing amenity and water quality benefits.
- e. Deliver wastewater infrastructure improvements across the borough in partnership with water companies to help develop and implement their Drainage and Wastewater Management Plans (DWMPs).
- f. Reduce the risk of flooding (from all sources) in an integrated way through coordination with the following local plan policies; –Open Space and Green Infrastructure; Urban Greening; Managing Local Flooding; Sustainable Drainage Systems; Placemaking and Design.

Justification ~~Supporting~~ Text

- 15.7.1. Management of flood risk within Merton will be undertaken in line with the NPPF, Flood and Water Management Act 2010, Flood Risk Regulations 2009 and the European Water Framework Directive 2000 transposed into law through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003.
- 15.7.2. Merton Council has statutory duties and responsibilities, set out under the Flood and Water Management Act 2010. As Lead Local Flood Authority, Merton Council is responsible for managing local flood risk, including flooding from surface run-off, ordinary watercourses and groundwater. The Environment Agency is responsible for main rivers (including the River Wandle, The River Graveney and the Beverley and Pyl Brooks in Merton). Thames Water are responsible for wastewater sewerage, including flooding arising from public sewers. Sutton and East Surrey Water and Thames Water are responsible for clean water supply in the borough. The sources and mechanisms of flooding are often interlinked, and Merton Council will continue to work in partnership with all RMAs and local interested groups, such as the South East Rivers Trust and neighbourhood groups to manage the risk of flooding.
- 15.7.3. Merton Council has updated the Strategic Flood Risk Assessment (SFRA) in partnership with LB Wandsworth and the Environment Agency. The SFRA takes consideration of the updated national climate change allowances. The Level 1 SFRA provides an overview of flood risk issues in Merton from all sources. The Level 2 SFRA assesses the risk to specific site allocations where development is, proposed in areas at risk from flooding. The Level 2 SFRA provides sufficient information to allow the application of part b) of the NPPF Exception Test.
- 15.7.4. Information and guidance on how to carry out a Sequential Test and Exception Test and what must be, addressed within a development's Flood Risk Assessment can be, found in [Merton's online SFRA GIS map](#). Further guidance can also be, found in the Environment Agency's current advice on Flood Risk Assessment, NPPF and the National Planning Practice Guidance, all of which are available online. Pre-application discussions with the Environment Agency and/or Merton Council are strongly recommended to confirm both the requirements for flood risk management, any mitigation which may be required and to ensure sustainable drainage is incorporated appropriately and accordance with Policy F13.10 Sustainable Drainage Systems.
- 15.7.5. Merton's Local Flood Risk Management Strategy identifies Merton's objectives and measures for how we will manage local flood risk, (defined as flooding from surface water, groundwater and ordinary watercourses) and it includes specific requirements ~~with regards to~~ about management of flood risk to and from development. Developers should

ensure that development proposals meet the objectives and requirements identified in the Local Flood Risk Management Strategy.

- 15.7.6. Flood events are, expected to become more frequent and more significant in the future, as the U.K.'s climate changes and this requirement will go some way to adapting to this change. The installation of sustainable drainage measures, such as green roofs, raingardens and swales can deliver multi-functional benefits: increasing biodiversity and urban cooling; enhance open space in built-up areas and improvements to water quality. [Merton's SUDS SPD](#) provides further guidance on designing and implementing SUDS in development and addresses how Merton, as the LLFA, will review and evaluate third party drainage proposals on developments.
- 15.7.7. SUDS will be, implemented in all developments. The requirement to utilise SUDS including those in low-risk areas, is because surface water from one area of a catchment may contribute towards enhanced flood risk in another area of that catchment.

Policy F15.8

Managing Local Flooding

- a. Developments must incorporate the latest climate change allowances as part of the Flood Risk Assessment (FRA) and/or Surface Water Drainage Strategy.
- b. Where development is proposed in the Environment Agency’s Groundwater Source Protection Zones 1 or 2 measures must be taken to ensure the protection of groundwater supplies.
- c. Developments must demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development. Where there is limited or no capacity identified through known flood incidents or predicted flood risk, on-site improvements must be programmed/planned.
- d. We will expect to see a sequential approach applied to the site layout, locating the most vulnerable elements of a proposed development within areas at lowest risk of flooding. All buildings should be set back from the top of the banks by at least 8m for main rivers and 5m for ordinary watercourses. This is to allow for future improvements and maintenance of land drainage and flood defences, improve the ecological functioning of river corridors and enhance local amenity.
- e. In Flood Zones 2 and 3 or on sites shown to be at high risk of surface water flooding and for all proposals for sites of:
 - 10 dwellings or more or,
 - 1000sqm of non-residential development or more or
 - on any other proposal where safe access/egress cannot be achieved,
 In accordance with the SFRA, a Flood Emergency Plan must be, submitted.
- f. Permit appropriate development in Flood Zones 1, 2, 3a and 3b subject to meeting the criteria in the following table:

Flood zones: Land uses and developments restrictions	Sequential Test	Exception Test	FRA and Drainage Strategy
<p>Flood Zone 3b: Functional floodplain</p> <p>The functional floodplain will be protected by not permitting any form of development on undeveloped sites unless it is:</p> <ul style="list-style-type: none"> • Water Compatible development. • Essential utility infrastructure 	<p>Required for essential infrastructure.</p>	<p>Required for essential infrastructure.</p>	<p>An FRA is, needed for all developments.</p> <p>A Drainage Strategy is, needed for all new dwellings and major developments.</p>

Flood zones: Land uses and developments restrictions	Sequential Test	Exception Test	FRA and Drainage Strategy
<p>In these cases, essential infrastructure that has passed the Exception Test and water compatible uses should be, designed and constructed to remain operational and safe for users in times of flood; result in no net loss of floodplain storage; not impede water flows and not increase flood risk elsewhere.</p> <p>Redevelopment of existing developed sites will only, be supported if there is no intensification of the land use, no increase in building footprint, number of units or bedrooms and a net flood risk reduction is proposed.</p> <p>Restoration of the functional floodplain will be, supported.</p> <p>Proposals for the change of use or conversion to a use with a higher vulnerability classification will not be, allowed.</p>			
<p>Flood Zone 3a: High Risk</p> <p>Essential Infrastructure and More Vulnerable development may be, permitted where the Exception Test is satisfied.</p> <p>Water Compatible and Less Vulnerable land uses are, permitted.</p> <p>Highly Vulnerable developments will not be, allowed.</p> <p>Self-contained residential basements and bedrooms at basement level will not be, allowed.</p>	<p>Required for all developments unless exceptions outlined in the justification applies.</p>	<p>Required for Essential Infrastructure and More Vulnerable development.</p>	<p>A Drainage Strategy is, needed for all new dwellings and major developments.</p> <p>An FRA is required for all development proposals.</p>
<p>Flood Zone 2: No land use restrictions</p> <p>Self-contained residential units at basement level and bedrooms at basement level will not be, allowed by the Council without right mitigation measures in line with Environment Agency Guidance and Merton Local Plan policy.</p>	<p>Required for all developments unless exceptions outlined in the justification applies.</p>	<p>Required for Highly Vulnerable development.</p>	<p>A Drainage Strategy is, needed for all new dwellings and major developments.</p> <p>An FRA is, needed for all development proposals.</p>

Flood zones: Land uses and developments restrictions	Sequential Test	Exception Test	FRA and Drainage Strategy
<p>Flood Zone 1 No land use restrictions.</p>	N/A	N/A	<p>A Drainage Strategy is, needed for all new dwellings and major developments.</p> <p>In line with Merton’s Strategic Flood Risk Assessment (SFRA) and the Planning Practice Guidance, an FRA is needed for development sites which are:</p> <ul style="list-style-type: none"> • more than 1 hectare (ha) • less than 1 ha, including a change of use in development type to a more vulnerable class (for example from commercial to residential), where it could be affected by sources of flooding other than rivers (for example surface water, groundwater and sewer flooding) as identified in the Merton Council SFRA • in an area which has critical drainage problems

Where a Flood Risk Assessment (FRA) is required, it must:

- i. Conform with, national policy and guidance, as well as the BSI (British Standards Institution) Code of Practice on Assessing and managing flood risk in development (BS 8533:2017).

Merton Council and/or Environment Agency may need addition research or information depending on the type of development and location to be included in the FRA.

- ii. Be submitted with the planning application.
- iii. Provide evidence of the application of the Sequential Test and where required, the Exception Test.
- iv. Take account of the advice and recommendations within the Merton’s Strategic Flood Risk Assessment, Local Flood Risk Management Strategy and Surface Water Management Plan.

Planning conditions or planning obligations may be, used where appropriate to secure flood risk mitigation and sustainable drainage measure to mitigate flooding from different flood sources within development proposals.

Basements and subterranean developments

Basements within flood-affected areas of the borough represent a particularly high risk to life, as they may be subject to very rapid inundation. Applicants will have to demonstrate that their proposal meets the following requirements:

Flood Zone	Details
Flood Zone 3b Functional Floodplain	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will not be, allowed.
Flood Zone 3	<p>New basements:</p> <ul style="list-style-type: none"> • Less Vulnerable / Water Compatible uses are, permitted. • More Vulnerable uses will only be, considered if; an FRA shows that the risk to life can be managed. Bedrooms at basement levels will not, be allowed. • Highly Vulnerable uses, such as self-contained basements/bedrooms use will not be, allowed. <p>Existing basements:</p> <ul style="list-style-type: none"> • No basement extensions, conversions, or additions for Highly Vulnerable uses. • More Vulnerable uses: - will only be, considered if an FRA demonstrates that the risk to life can be managed.
Flood Zone 2	<p>New Basements: if the Exception Test (where applicable) is passed, basements may be allowed for residential use where they are not self-contained or used for bedrooms.</p> <p>Existing Basements: basement extensions, conversions or additions may be, allowed for existing developments where they are not self-contained or used for bedrooms.</p> <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher</p>

Flood Zone	Details
	floor and flood resistant and resilient design techniques must be, adopted.
Flood Zone 1	No restrictions on new basements or extensions to existing basements, providing they are, accompanied with the necessary assessments.

Justification Supporting Text

- 15.8.1. The protection of people, properties, and infrastructure from the risk of flooding from all sources is of immense importance. The flood risk and sustainable drainage systems policies, is supported by Merton's Strategic Flood Risk Assessment (SFRA). Local Flood Risk Management Strategy (LFRMS) and Surface Water Management Plan (SWMP).
- 15.8.2. Merton is, affected by several sources of flood risk, primarily surface water flooding which has been the cause of recent flood events in the borough in the summer storms of 2017, 2016 and most significantly in 2007. The borough is also, affected by flooding from rivers, ordinary watercourses, sewers, reservoirs and groundwater flooding. The Level 1 SFRA gives an overview of flooding from all sources across the borough.
- 15.8.3. The Environment Agency's Risk of Flooding from Surface Water mapping, alongside Merton's SFRA, LFRMS and SWMP and historical flooding records of the borough, show that several areas including Colliers Wood, West Barnes and Raynes Park and Summerstown are, affected by multiple flood risk sources.
- 15.8.4. We hold practical information on our website where users can: find out if they are at risk of flooding, get help during a flood, report flooding, and find out more about how we are managing local flood risk.
- 15.8.5. To create job opportunities, deliver homes and essential infrastructure, meet the demands of predicted population growth, enable future economic growth and secure improvements in areas such as Colliers Wood and ~~other sites within~~ the Wandle Valley. It will be necessary to develop on sites within areas at medium to high risk of flooding, subject to meeting the requirements of the Sequential and Exception Tests as set out in the NPPF.

Flood Risk Assessments (FRAs)

- 15.8.6. Flood Risk Assessments (FRAs) will be, needed in line with national policy and guidance, as well as the BSI (British Standards Institution) Code of Practice on Assessing and managing flood risk in development (BS 8533:2017). This code provides detailed information on, the requirements for, assessing and managing flood risk in development and how to produce site-specific FRAs.
- 15.8.7. Developers should agree the scope of the FRA in consultation with the council in their role and the LPA and LLFA from the earliest stages of project planning and design to ensure that appropriate flood risk management measures are included as part of the design and layout. Developers should refer to the EA's guidelines on 'Flood Risk Assessment for Planning Applications' or the EA's 'Standing Advice on Flood Risk Assessment' in cases where an FRA is not needed, including for householder applications and minor non-residential extensions. We will consult the EA on all proposals

accompanied by an FRA or for any proposal within 20m of a main river or culverting operation.

- 15.8.8. FRAs should assess the risk of flooding in the future ~~as a result~~ because of the impact of climate change on river flows and rainfall patterns, taking account of the latest climate change allowances. This will help minimise vulnerability and provide resilience to flooding in the future. FRAs should set out the proposed measures to; manage flood risk over the lifetime of the development. ~~I~~ncluding measures to steer development away from areas considered to be at high risk of flooding from all sources, applying appropriate site and building design (Policy 12.1), incorporating Sustainable Drainage Systems (Policy F15.9), maintaining and enhancing the borough's green and blue infrastructure (Policy O15.2) and contributing to urban greening (Policy O15.6).
- 15.8.9. FRAs must address the management of surface run-off, the extent of impermeable surfaces resulting from the development, and the potential for increased flood risk both on-site and elsewhere within the catchment.
- 15.8.10. In addition to fluvial flooding, properties and infrastructure within the Merton are also at high risk of flooding from other, more localised sources, such as surface / groundwater / sewer flooding due to surcharging of sewers and drains or due to the failure of infrastructure. Flooding can also occur away from the fluvial floodplain because of development where on-site/off-site infrastructure is not in place ahead of development. Therefore, an FRA is, also needed for smaller development proposals in Flood Zone 1, where there is evidence of a risk from other sources of flooding identified in the SFRA.

Sequential Test and Exception Test

- 15.8.11. Future development in Flood Zones 3a and 2, will only be considered if the 'Sequential Test' has been applied following national policy and guidance. However, there will be some exceptions to this. The Sequential Test will not be needed if, it is not a major development and at least one of the following applies:
- It is a ~~Local Plan proposal-sites allocation~~ that has, already been sequentially tested, unless the use of the site ~~being~~ proposed is not per the allocations in the Local Plan.
 - It is within a main centre boundary as identified within this Local Plan (Wimbledon and Morden town centres).
 - Redevelopment of an existing single residential property.
 - Conversions and change of use.
- 15.8.12. The Sequential Test will be needed in all other cases.

- 15.8.13. If, following the application of the sequential test, it is not possible, consistent with wider sustainability objectives (environmental, social and economic) for development to be in a flood zone with a lower probability of flooding, the exception test may have to be, applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

Water infrastructure

- ~~15.8.14. We will look to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will need to show that there is adequate capacity both on and off-site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out studies to learn the effect proposed development will have on the existing infrastructure. Overloading of the system will not be allowed.~~
- ~~15.8.15. Where there is a capacity problem the developer will need to fund improvements to be completed prior to completion of the development. An exception to this is where the water company has improvement works programmed in that fits with the completion time of the development.~~

Basement and subterranean Supplementary Planning Document (SPD)

- 15.8.16. Basement and subterranean applications must ensure they are safe from flooding and do not increase risk to and from the site. We will only allow basements and other underground/subterranean development where:
- It it can be proven it will not cause harm to the built and natural environment and local amenity including the local water environment, ground conditions and biodiversity.
 - The basement itself will be, protected from flooding.
 - Positively pumped devices are, installed to protect basements from the risk of sewer flooding. Applicants are required to show the location of the pump device on the planning application drawings.
- 15.8.17. Basement developments require the submission of more information in the form of a Basement Impact Assessment (BIA), Construction Method Statement (CMS) and Site-Specific Ground Investigation to provide us with a basis for deciding planning applications. [Merton's Basement and Subterranean Development SPD](#) provides guidance and sets out what needs to be, demonstrated as part of an assessment.

Policy F15.9

Sustainable Drainage Systems (SUDS)

All major development must include water efficiency measures, to minimise water consumption such as rainwater harvesting or grey water recycling, as well as Sustainable Drainage Systems (SUDS) to reduce surface water runoff to greenfield rates, and provide biodiversity, urban greening, amenity and water quality benefits.

Details should be supplied which address the maintenance requirements of the drainage systems for the lifetime of the development which they serve.

We will require all developments to reduce the risk of flooding by:

- a. Seeking mitigating measures against the impact of flooding from all sources and ensure all new development including all basement and subterranean development implement appropriate SUDS and show sustainable approaches to the management of surface water in line with the Non-Statutory Technical Standards for SUDS.
- b. Ensuring developers prove the maintenance and long-term management of SUDS through a SUDS Management Plan submitted as part of the planning process.
- c. Requiring developers to incorporate soft landscaping, appropriate planting (including trees) and permeable surfaces into all new developments including non-residential developments, in line with Policy O15.7 *Urban Greening*.
- d. Requiring the retention of soft landscaping and permeable surfaces in existing gardens. For example, all new driveways or parking areas associated with development should be made of permeable materials in line with permitted development rights.
- e. Ensuring any development or re-development that effects a heritage asset or its setting (including conservation areas) must consider Sustainable Drainage Systems (SUDS) and demonstrate within a Heritage Statement the approach taken to ensure that there is no adverse impact on the character and appearance of the asset and that there is no long-term deterioration to the building's fabric.
- f. Reducing surface water discharge to greenfield runoff rates.
- g. Using conditions or planning obligations to secure flood risk mitigation and sustainable drainage measures.

Justification Supporting Text

Surface water and sewer flooding

- 15.9.1. The borough is very susceptible to surface water flooding. Surface water flooding happens when the ground and rivers cannot absorb heavy rainfall and when manufactured drainage systems have insufficient capacity to deal with the volume of rainfall. Typically, this type of flooding is localised and happens very quickly, making it exceedingly difficult to predict and give warnings. With climate change predicting more frequent short-duration, high intensity rainfall and more frequent periods of long-duration rainfall, coupled with an ageing Victorian sewer system and increasing pressure from growing populations, surface water flooding is likely to be an increasing problem.
- 15.9.2. Thames Water has modelled the impact of London's projected population growth and climate change on its drains and sewers to understand their ability to cope with these future challenges. The modelling shows that for a relatively common rainfall event in 2050 (one that would be expected on average once every other year), some areas of London, would not have sufficient drainage or sewerage capacity to manage the expected flows, leading to an increasing risk of surface water and sewer flooding.
- 15.9.3. We will seek to direct development away from areas at the highest risk of flooding, or, where development is required in areas at risk of flooding, we will ensure it is safe for the lifetime of development, without increasing flood risk elsewhere. Development proposals should ensure that they have taken full account of flood risk and sought to utilise sustainable drainage measures.
- 15.9.4. To reduce the risk of surface water and sewer flooding, all development proposals in the borough that could lead to changes to, and have impacts on, surface water run-off must follow the London Plan drainage hierarchy:
- Store rainwater for later use
 - Use infiltration techniques, such as porous surfaces in non-clay areas.
 - Attenuate rainwater in ponds or open water features for gradual release to a watercourse
 - Attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse discharge rainwater direct to a watercourse.
 - Discharge rainwater to a surface water drain
 - Discharge rainwater to a combined sewer

- 15.9.5. As well as managing flood risk consideration should be, made for how rainwater-harvesting systems can be, used to minimise the use of mains water, as promoted by Policy CC2.6 Sustainable Design Standards. [This policy provides details on the Council's water efficiency standards.](#)

Sustainable Drainage System (SUDS)

- 15.9.6. SUDS is a drainage and landscaping scheme which utilises a 'management train' of various drainage techniques used in series to mimic as closely as possible the natural site's processes, thereby mitigating and managing the impact of a development on flood risk, water quality and biodiversity and amenity value.
- 15.9.7. It is important to ensure that new development sites found within the Strategic Flood Risk Assessment identified area of 'increased risk of surface water ponding' implement surface water attenuation. It is imperative that this policy is, read in conjunction with other Local Plan flood management policies and [Merton's Sustainable Drainage and Design and Evaluation Supplementary Planning Document \(SPD\)](#) (known as the SUDS SPD).
- 15.9.8. Merton's SUDS SPD supplies further guidance and support to the Local Plan policies relating to flood risk (from all sources) and SUDS. The SPD sets out our expectations on designing, maintaining and managing SUDS and is a material consideration as part of planning decisions.

Green roofs and walls

- 15.9.9. The design and operational needs of a green roof or wall should not place undue stress on water supply and other natural resources. Extensive green roofs, which are suitable for flat and pitched roofs and for retrofitting, with minimal maintenance and no requirement for irrigation once established, are particularly encouraged. All green and brown roof systems should use a high percentage of recycled products.
- 15.9.10. The provision of green roofs does not negate the need to make adequate open space provision on the ground. Any proposals for accessible green roofs need to be, designed for security and safety and not adversely affect neighbouring properties.
- 15.9.11. The use of green roofs and green walls in smaller developments, renovations, conversions, extensions and retrofitting is encouraged and supported, where opportunities arise. Conditions will be, used where proper to secure the proper installation, maintenance and responsibility for green roofs and walls.

Policy P15.10 Improving Air Quality and Minimising Pollution

- a. Merton Council will ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, water pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.
- b. Several policies in the local plan contribute to reducing and/or mitigating the impacts of air pollution such as transport, green infrastructure, design and climate change policies. Developers must have regard to ~~follow~~ any guidance provided by Merton Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts.

Air Quality

- c. Major developments in Merton, development briefs for large-scale development subject to an Environmental Impact Assessment (EIA) should achieve Air Quality Positive Approach status.
- d. All developments must be at least Air Quality Neutral and resist development proposals, which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Merton's Local Air Quality Management Plan.
- e. Development proposals in Air Quality Focus Areas (AQFAs) or development proposal that are likely to be, used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to, minimise exposure following London Plan policy SI 1: *Improving air quality*.
- f. Residential development proposals and change of use to residential at street level will need to submit an Air Quality Impact Assessment in areas of poor air quality.
- g. Development proposals must consider the impact of introducing new developments in areas already subject to poor air quality, the following will be needed:
 - i. An Air Quality Impact Assessment, including where necessary, modelled data.
 - ii. Mitigation measures to reduce the development's impact upon air quality including the type of equipment installed, thermal insulation and ducting abatement technology.

- iii. Measures installed in the new development to protect the occupiers of new developments from existing sources of pollution.
 - iv. Strict mitigation for developments to be used by sensitive receptors such as schools, hospitals, care homes, areas of deprivation and in areas of existing poor air quality; this, also applies to proposals close to developments used by sensitive receptors.
 - v. The use of green infrastructure, including trees and hedgerows to reduce the exposure to air pollution to absorb dust and other pollutants.
- h. Development proposals will be, expected to demonstrate how they will minimise air pollution associated with the transport requirements including delivery, servicing and construction vehicles.
- i. All decentralised energy schemes to demonstrate that they can be, used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be, prioritised over other air quality neutral technologies.
- j. We will seek financial contributions using Planning Obligations towards air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality.

Noise and vibration

- k. Development proposals will be expected to:
- i. Provide a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels.
 - ii. Provide mitigation measures where noise needs to be controlled and managed
 - iii. Agree to time limits and restrictions for activities where noise cannot be, sufficiently mitigated.
 - iv. Use good acoustic design within their development.
 - v. That where applicable suitable mitigation measures will be sought by planning obligation or condition.
 - vi. Minimise noise from servicing and deliveries.
 - vii. Protect the relative tranquillity in and around open spaces.
- ~~l. New noise generating developments should be appropriately located to minimise their impacts on noise sensitive land uses and noise sensitive developments should be located away from noise priority locations and noise generating land uses.~~
- m. New development, which would have a significant effect on existing or future occupiers or the local amenity due to noise or vibration, will not be allowed unless the potential noise problems can be overcome by suitable mitigation measures.

- n. Where a noise-sensitive development is seeking planning permission to locate in an already noisy area (e.g. a town centre or near a busy road), the new noise-sensitive development will be responsible for mitigating impacts from existing noise-generating activities in line with the Agent of Change principle set in the National Planning Policy Framework and the London Plan [policy D13](#).
- o. We will support good acoustic design and use of innovative technologies to minimise noise levels.
- p. Where necessary, applicants will be, expected, to carry out noise assessments and provide details of the noise levels on the site. Where noise mitigation measures will be required to enable development to take place, an outline application will not normally be acceptable.

Light pollution

- q. The potential adverse impacts from lighting arrangements will be, controlled by requiring all developments that include proposals for external lighting including illuminated signs and advertisements, security and floodlights and other illuminations to submit details in line with the recommendation of the Institute of Lighting Professionals. Lighting details must show that it:
 - i. [Is](#) appropriate for the intended use,
 - ii. [P](#)rovides the minimum amount of light necessary to achieve its purpose and designed to minimise the detrimental impact of glare and light spill on the local amenity, nature, biodiversity and highways,
 - iii. [Is](#) energy efficient and
 - iv. [P](#)rovides adequate protection from glare and light spill, particularly to nearby sensitive receptors such as residential properties and [Sites of Recognised Nature Conservation Interest Areas](#), including the River Wandle.
- r. Development proposals for leisure, sport and/or play facilities must [have regard to follow](#) Sport England's Artificial Lighting Guidance and London Plan policy S5 Sports and recreation facilities.

Odours and fume control

- s. Merton Council will ensure that any potential impacts relating to odour and fumes from commercial activities are mitigated by requiring the following:
 - i. An impact assessment where necessary.
 - ii. The type and nature of filtration to be used
 - iii. The height and position of any chimney or outlet
 - iv. Promotion and use of new abatement technologies

Land contamination

- t. Where development is, proposed on or near a site known to be, or there is good reason to believe may be, contaminated, or where a sensitive use is proposed, the applicant must carry out a site assessment and submit a report of the findings to establish the nature and extent of the contamination. Development will not be permitted unless practicable and effective measures are ~~to be~~ taken to treat, contain or control any contamination.
- u. Developments must incorporate proper remediation measures for development on or near a site, which is potentially contaminated.
- v. Development will not be allowed unless practical and effective measures are taken to treat, contain or control any contamination so as not to:
 - i. Expose the occupiers of the development and neighbouring land uses including, in the case of housing, the users of open spaces and gardens to unacceptable risk.
 - ii. Threaten the structural integrity of the building being built, the site or to be, built on or adjoining the site.
 - iii. Lead to the contamination of any watercourse, water body or aquifer.
 - iv. Cause the contamination of adjoining land or allow such contamination to continue.
- w. We will not approve any application that the Health and Safety Executive (HSE) has recommended that permission should not be, granted.

Managing pollution from construction and demolition

- x. Merton Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments.
- y. To deliver this we require the submission of Construction Management Statements (CMS) for the following types of developments:
 - i. All major developments.
 - ii. Any basement and subterranean developments.
 - iii. Developments of sites in confined locations or near sensitive receptors; or
 - iv. If substantial demolition/excavation works are proposed.
- z. Where applicable and considered necessary, we may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS.
- aa. For major development, applicants should show how they have considered Merton's Air Quality Action Plan, Merton's ~~emerging~~ Air Quality Supplementary Planning Document, ~~Merton's emerging~~ Non-Road Mobile Machinery (NRMM) Practical Guide, Dust Controls and Logistics Planning from the earliest stage in the design and construction method of their development.

- bb. Construction and demolition sites must ensure silt does not enter the local drainage systems or watercourses and is carefully controlled and managed on site to prevent pollution and environmental damage.
- i. Its essential construction and demolition sites ~~have regard to follow~~ the [Right Waste Right Place guidance](#) and [Waste Management Duty of care of practice](#) to ensure construction and demolition waste is, managed correctly to prevent pollution and miss description of waste.
 - ii. Pollution incidents should be reported to [Environment Agency 24-hour incident hotline](#)
 - iii. Vacant development sites should introduce increased security measures such as high security fencing/ concrete bollards and 24-hour security to prevent trespassing and illegal waste operators moving into vacant development sites to deposit large amount of fly tipping and then abandon sites. Justification
- cc. The design and layout of new development must endeavour to minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Any noise and polluting activities or feature such a plant equipment should be located away from sensitive areas, where possible to ensure that there are no detrimental impacts on living conditions, health and wellbeing or local amenity.
- dd. Where there are, already significant adverse effects on the environment or amenity due to pollution, sensitive uses should be steered away from such areas. However, given the limited availability of land for development in the borough, this will not always be possible. Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.
- ee. Operations that are likely to give rise to noise, dust, vibration, odour or other pollutants are also, controlled by the licensing regulations implemented by Merton's Environmental Health Team, Pollution Teams and the Environment Agency. We advise that applicants to discuss proposals with potential adverse impacts on air, land, light pollution, noise and water at the initial stages of the planning application process with Merton's Environmental Health Team.

Justification Supporting Text

Air quality

- 15.10.1. NPPF Paragraph ~~184~~ 186 states that Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement Air Quality Impact Assessments (AQA). All local plan policies ~~in this local plan policies~~ will play a role in reducing and mitigate against the exposure to poor air quality that causes harm to health, including other green infrastructure and health and wellbeing polices. ~~Supported by~~ Merton's Air Quality Action Plan, Climate Change Strategy and action plan, Merton's Health and wellbeing strategy and Merton's Air Quality Supplementary Planning Document (SPD) ~~these documents,~~ support the local plan and outline steps we are taking to improve air quality in the borough.
- 15.10.2. Air pollution not only is only detrimental to health and wellbeing but also has impacts on the environment and economy. The World Health Organization (WHO) identifies air pollution as the greatest environmental risk to human health, with 90% of the world's urban population living in cities exceeding its air quality guidelines. In the UK (United Kingdom) each year, it contributes up to 37,000 deaths and costs city-regions over £20bn. In the UK 5.4 million people are living with asthma, around 1 million have 'difficult' asthma which includes an estimated 200,000 adults and children in the UK with 'severe' asthma, a condition that needs specialist assessment and bespoke support and treatments according to the Asthma UK. There is emerging evidence, which shows that air pollution increases the number and severity of COVID-19 cases.
- 15.10.3. The Environment Bill delivers key aspects of our Clean Air Strategy with the aim of maximising health benefits for all and sits alongside wider government action on air quality. The Environment Bill will deliver cleaner air for all by requiring the government to set targets on air quality, including for fine particulate matter, the most damaging pollutant to human health.
- 15.10.4. Councils and other relevant public bodies will be required to work together more closely to tackle local air quality issues, and it will be easier for local authorities to enforce restrictions on smoke emissions from domestic burning, which pollutes our towns and cities. In addition, the Bill gives the government the power to make vehicle manufacturers recall vehicles if they do not comply with relevant environmental standards, ensuring illegally polluting vehicles are, taken off the road quickly.
- 15.10.5. The Bill introduces a legally binding duty on the government to bring forward at least two air quality targets by October 2022. The first is to reduce the annual average level of fine

particulate matter (PM2.5) in ambient air. This will deliver substantial public health benefits.

- 15.10.6. The second air quality target must be a long-term target (set a minimum of 15 years in the future), which will encourage long-term investment and provide certainty for businesses and other stakeholders. The environmental targets policy paper published in August 2020 outlined the proposal to break new ground and focus this target on reducing population exposure to PM2.5.
- 15.10.7. The principle of, a population exposure reduction target is to prioritise action that is most beneficial for public health and drive continuous improvement. This target will drive improvement across all areas of the country; even in areas that already meet the new minimum standard for PM2.5. This approach recognises there is no safe level or standard of PM2.5.
- 15.10.8. A new concentration target for PM2.5 will act as a minimum standard across the country, and a population exposure reduction target (PERT) will prioritise action to secure the biggest public health benefits drive continuous improvement across the whole country, not just in pollution hotspots.
- 15.10.9. The local plan can influence air quality in several ways, for example through what development is proposed and where, and the provision made for sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible. The ~~whole~~ borough has been declared an Air Quality Management Area (AQMA) for last two decades.
- 15.10.10. We seek to tackle poor air quality in an integrated way, the Local Plan together with a wider range of measures set out in Merton's Air Quality Action Plan, which supports the Government's Clean Air Strategy (2019), the Mayor of London Environment Strategy (2018) and other legislation.

Air Quality Assessments (AQA)

- 15.10.11. We require that air quality issues ~~to be~~ **are** considered early in the planning process and to be assessed in detail if necessary (i.e. for developments that may increase local emissions significantly) is the best way of establishing a design led approach to mitigating those emissions and reducing exposure. Further assessments should be carried out as the design evolves to ensure that impacts from emissions are prevented or minimised as far as possible, and to fully quantify the expected effect of any proposed mitigation measures, including the cumulative effect where other nearby developments are also underway or likely to come forward.

- 15.10.12. Air Quality Assessments should include 'air quality neutral' assessments carried out with reference to the GLA's emission benchmarks for buildings, transport and combustion-based energy plant. Developments that do not exceed these benchmarks will be 'air quality neutral'.
- 15.10.13. New developments are, expected to contribute towards improving local air quality, particularly where they include potentially major new sources of emissions or could significantly increase traffic-generated emissions. Some developments such as schools, nurseries, hospitals and care homes for the elderly and housing, may be, particularly affected by the potential impacts of poor air quality on the occupants of the development. Therefore, development that may result in an adverse impact on air quality including during construction, may require an Air Quality Impact Assessment in order to consider any pollution impact linked to development proposals.
- 15.10.14. Necessary mitigation measures will be, secured through negotiation on a scheme or using planning obligations or conditions where appropriate. Further guidance and more information on our air quality aims and priorities can be, found in Merton's Air Quality Action Plan (AQAP) and [Merton's Air Quality Supplementary Planning Document SPD 2021](#).

Air Quality Neutral and Positive

- 15.10.15. We have adopted the London Plan's approach to Air Quality Positive and Neutral development. Large master planning and large-scale developments have the potential to include methods to improve local air quality. All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been, exploited, financial contributions to offset the impact of the development on air quality may be, considered as a final intervention.
- 15.10.16. The aim of an AQA is to identify any significant impact on local air quality and/or amenity due to dust and/or odour and/ or whether new development will introduce new exposure in an area of poor air quality. The contents of the AQA will depend on the nature of the proposed development.
- 15.10.17. Consideration must be given to the impact of improvements on air quality elsewhere. For instance, traffic reductions could improve local air quality but push traffic-related air quality impacts to other areas. Early engagement with us is encouraged to assess how the development could avoid these unintended consequences. The [supporting emerging Air Quality Supplementary Planning Document \(SPD\)](#) provides further details [on for](#) AQA

and what; we expect to be, proved within an AQA. The assessment should provide decision makers with sufficient information to understand the scale and geographic scope of any detrimental, or benefit impacts on air quality and enable them to exercise their professional judgement in deciding whether the impacts are acceptable, in line with best practice.

Air quality and green infrastructure

- 15.10.18. Overall, vegetation and trees are, regarded as beneficial for air quality, but they are not a solution to the air quality problems at a city scale, reducing vehicle journeys and adopting behavioural changes is key to improve our air quality.
- 15.10.19. The value of green infrastructure for urban air quality lies in its ability, not to remove pollution, but rather to control the distribution by strategically enhancing (or reducing) its dispersion close to its source for example at the roadside. It acts as a barrier that reduces the public exposure to, what is, emitted, and thereby further improve public health outcomes. However, we still need to create environments that incentivise behaviour changes in the way we travel and encourages walking, cycling and other sustainable modes. The design quality of our streets is crucial in producing attractive environments at a human scale, with reduced air and noise pollution and opportunities to connect with nature.

Air quality and combined Heat and Power (CHP)

- 15.10.20. Some carbon reduction measures for energy generation and spatial heating can adversely impact, local air quality if not properly mitigated. The use of individual Combined Cooling, Heating and Power (CCHP), Combined Heat and Power (CHP) and Biomass to produce heat and power can deliver significant reductions of CO₂. However, the use of these technologies could also lead to increases in NO₂ and particle emissions. Therefore, their air quality impacts need to be, assessed as part of an Air Quality Assessment. CHP or other combustion-based technologies that cannot demonstrate that they will have acceptable impacts will not, be accepted and instead the use of other sustainable energy generation air quality neutral technologies should be used which reduce both CO₂ and NO₂ emissions.

Air quality, pollutants and transport

- 15.10.21. We will ensure that new development in Merton is adequately managed and integrated with the transport network, including public transport, pedestrian and cycle networks, to enable it to accommodate growth in a sustainable manner, so that it does not contribute further to air quality deterioration, increased noise and congestion. As set out in the Transport Policies, Transport Assessments/Statements will be required for development proposals [to properly identify transport impacts and the mitigation measures to address](#)

~~them. so that transport impacts of development proposals can be properly identified and addressed~~

- 15.10.22. Freight, servicing and delivery vehicles, particularly heavy goods vehicles are a significant source of noise and air pollution, particularly around commercial and industrial locations. Delivery and servicing trips have been increasing in London, ~~and have which has been~~ accelerated recent rapid market evolution in home delivery for a range of services as a result, of the pandemic. However, low carbon alternatives such as electric vans and cargo bike deliveries have also started to appear. Where a development is likely to generate a significant amount of movement by goods or delivery vehicles, we will require the development of a Delivery and Servicing Plan in accordance with [TfL's latest guidance](#). A Delivery and Service Plan provides a strategy to improve the safety, efficiency and sustainability of delivery and servicing vehicles through a range of interventions including consolidation, low carbon delivery modes and the retiming of movements to avoid peak hours.

Noise and vibration

- 15.10.23. Noise and vibration pollution affect both health and behaviour. Characteristics that cause or increase noise pollution such as poorly located emission sources, street canyons and noise sources should also be, designed out wherever possible. The main source of ambient noise in Merton is road traffic. However, other activities such as construction, busy high or night-time activities may also impact on noise levels. Therefore, it is important that new development assists in reducing potential exposure. Development proposals need to consider acoustic design at an early stage of the planning process to ensure occupiers of new and noise sensitive buildings are, protected.
- 15.10.24. For a long time, the responsibility for managing and mitigating the impact of noise on neighbouring residents and businesses has been placed on the business or activity making the noise, regardless of how long the noise-generating business or activity has been operating in the area. In many cases, this has led to newly arrived residents complaining about noise from existing businesses, sometimes forcing the businesses to close.
- 15.10.25. The Agent of Change principle, set out in the London Plan ~~(2020)~~ and the National Planning Policy Framework, places the responsibility for mitigating the impact of noise firmly on the new development. This means that where new developments are, proposed close to existing noise-generating uses, applicants will need to design them in a more sensitive way to protect the new occupiers, such as new residents, businesses, schools and religious institutions, from noise impacts. This could include paying for soundproofing for the existing noise generating uses, such as an existing music venue.

- 15.10.26. The Agent of Change principle works both ways. If, a new noise-generating use is, proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on, the new use to ensure its building or activity is, designed to protect existing users or residents from noise impacts.
- 15.10.27. Noise generating cultural venues such as theatres, concert halls, pubs and live music venues should be, protected. This requires a sensitive approach to managing change in the surrounding area. Adjacent development and land uses should be brought forward and designed in ways, which ensure established cultural venues still, are viable, contribute to the local economy and can continue in their present form without the prospect of licensing restrictions or the threat of closure due to noise complaints from neighbours.
- 15.10.28. Housing and other noise sensitive development proposed near to an existing noise generating use should include necessary acoustic design measures. This will ensure new development has effective sound insulation to mitigate and minimise potential noise impact or neighbour amenity issues. Mitigation measures should be, explored at an early stage in the design process, with necessary and right provisions secured through planning obligations.
- 15.10.29. Noise from construction during building of developments will be, managed through use of planning conditions.

Light pollution

- 15.10.30. The links of light pollution on human health and wellbeing has, been documented for several decades. Recently the effects of light pollution on plants and animals are becoming, more known. Light pollution can alter and interferes with the timing of necessary biological activities of wildlife. We will support well-designed artificial lighting that maximises the positive aspects and minimises its impact on local amenity and wildlife.
- 15.10.31. We will expect new buildings to be, designed to minimise light pollution from internal and external lighting. We will use the relevant professional standards as a guide to assessing light impacts such as the Institute of Lighting Professionals.
- 15.10.32. Lighting can be important for the accessibility of outdoor sports facilities and can help to improve their use. In new developments to help provide a healthy and safe environment, it can also be, used to enhance the appearance of some buildings. The form of lighting required will depend on the facility and its use, but efforts should be, made to minimise the impact on the surrounding areas, and not to cause a demonstrable harm to the local community, biodiversity or local wildlife. Excessive lighting can have a negative impact on residents' quality of life, adversely affect wildlife, contribute to 'sky glow' and energy

waste. Requiring the submission of details of external lighting in line with the recommendations of the Institute of Lighting Professionals for approval will allow external lighting and its impacts to be controlled and minimised.

Odours and Fume Control

- 15.10.33. Some commercial activities can have an impact upon the local environment. These impacts can include such things as odours, fumes, dust and steam. It is important that activities that create odour do not affect the surrounding amenity or the adjoining highway. Where appropriate, we will require odour assessments to make sure potential impacts are appropriately mitigated. Permitted development rights mean that some developments can accommodate a wide range of uses without the need for planning permission to change between them. Proposals for such uses, such as hot food premises, will require mitigation measures to be incorporated to prevent unacceptable odour issues arising in the future.
- 15.10.34. As part of the development process, we require that steps be taken to ensure that any impact is considered carefully, and that mitigation is in place to manage these types of emissions. Applicants will need to apply the ~~Department for Environment, Food and Rural Affairs' (DEFRA) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems.~~ [Control of Odour and Noise from Commercial Kitchen Exhaust Systems \(prepared by NETCEN for the Department for Environment, Food and Rural Affairs\).](#)

Land Contamination

- 15.10.35. Industrial activity, waste disposal, accidental spillages and transportation can cause contamination of land. Often this contamination is associated with industrial processes or activities, which are now not active, such as former printworks and other activities that were part of the Wandle Valley's industrial heritage. According with the requirements of the Environmental Protection Act 1990, we maintain a register of contaminated land sites in the borough. We will require developers to undertake a site investigation of any contamination of sites. The investigation must prove the nature and extent of the contamination prior to determining the application.
- 15.10.36. Where development is proposed on a site, that is, known or is believed to be contaminated; the need to carry out remediation or monitoring and to ensure adequate disposal of contaminated soil will be secured by planning conditions. We will, consult and seek advice from Environment Agency when considering applications on contaminated land.

- 15.10.37. The redevelopment of previously developed land (or 'brownfield') sites for beneficial uses, many of which **are may be**, potentially affected by contamination provides an opportunity to deal with the potential risks posed by contamination to human health and the natural environment.
- 15.10.38. Contamination sensitive development would typically include developments that potentially put people in direct contact with contamination, such as a new home, parks and open space or school uses.
- 15.10.39. Hazardous Gas Installations also affects parts of Merton. We will consult the Health and Safety Executive (HSE) on planning applications using methodology and software known as PADHI, which is available online. The HSE provides advice on safety grounds as to whether planning permission should to be, granted. Information on whether a site is, affected by this requirement is available from the council.

Construction and demolition

- 15.10.40. There is a need to ensure that occupiers are, protected from environmental disturbances during the construction and demolition phase of major developments, and during excavating and construction of subterranean developments such as basements.
- 15.10.41. We expect applicants and contractors to mitigate the construction impact, to implement good site management and communication, and proactively engage with the local community and affected residents. Innovative methods of construction to reduce nuisance and emissions from construction should be, implemented where possible.
- 15.10.42. We requires the submission of Construction Management Statements (CMS) for the types of developments as set out in the policy. In addition, [Merton's Basement and Subterranean SPD 2017](#), sets out guidance to ensure that problems relating to excavation and constructions of basements, such as highway/parking impacts, noise, dust, vibration and disturbance to neighbours are, avoided.
- 15.10.43. To manage the environmental impacts and ensure that the Construction Management Statements are, adhered to, we will seek a charge to the applicant/developer to cover the cost of monitoring the CMS. Where an applicant/developer uses the Merton Council Building Control, a discount may be, applied to this charge.
- 15.10.44. We may also require a management plan that sets out how developers monitor dust, noise and vibration, and where necessary take the action if issues arise. It will also be necessary to control the hours of operation for noisy site works and the processes, that **would** need to be, followed to work outside these hours when and if required.

- 15.10.45. In line with the transport policies, we may also require a Construction Logistics Plan (CLP) in areas that are subject to high traffic congestion to ensure that vehicles entering the site do not adversely impacts, on local traffic.
- 15.10.46. As part of our commitment to better air quality, we will also ask, through planning conditions, that the current regulations relating to Non-Road Mobile Machinery (NRMM) ~~be, imposed where necessary.~~ is applied.



16. SUSTAINABLE TRAVEL

Strategic Policy T16.1 Sustainable Travel

Merton Council aims to deliver an efficient, safe and sustainable transport system that will;

- Improve road safety outcomes in line with The Mayor's Vision Zero target.
- Reduce traffic congestion and parking dominance on Merton's streets.
- Address public health concerns associated with sedentary lifestyles through more active travel choices.
- Minimise the vehicular emissions that contribute towards climate change and local air pollution.

To do this we will:

- a. Plan spatial development in accordance with the transport principles for good growth and the "20 minute neighbourhood" approach, to create complete, compact and connected communities that facilitate walking, cycling and the use of public transport and reduce the need to travel by car.
- b. Apply the Healthy Streets Approach to create accessible streets and public areas where it is safe and convenient to socialise, walk, cycle and use public transport.
- c. Encourage and enable people to choose active travel modes, by implementing a comprehensive network of safe and convenient cycle and walking routes and providing supporting measures such as secure cycle parking, cycle training and route finding.
- d. Work with TfL (Transport for London) and Transport Operators to promote and seek improvements to public transport infrastructure and services.
- e. Seek to manage vehicle use and parking to improve road safety outcomes and, reduce traffic dominance and minimise impact on the transport network.
- f. Reduce vehicular emissions through supporting a switch to car clubs and electric vehicles and encouraging efficient, low-emission freight and delivery trips.

Justification Supporting Text

Transport challenges

- 16.1.1 The transport network plays a vital role in connecting communities and enabling people to access homes, jobs, education, services and leisure activities. However, accommodating these travel needs creates a number of challenges for the transport network. Traffic volumes in Merton have continued to increase over the last decade and this contributes towards road congestion and results in many of the borough's street environments being dominated by parked cars. Major roads that carry heavy and fast flows of traffic create a noisy and unpleasant environment. They can also act as barriers that physically separate communities and can be intimidating and potentially dangerous for pedestrians and cyclists. Transport is also a major producer of the vehicular emissions that contribute towards climate change and local air pollution.
- 16.1.2 ~~As set out in t~~The Mayor's Transport Strategy and the Government's Decarbonising Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce set out the overarching policy framework and strategic approach to transport which focuses on reducing dependency on cars in favour of active, efficient and sustainable modes of travel. The Mayor has set a target for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041. The specific target for resident's daily trips in Merton is 73% by 2041, but only 61% of these trips are currently made by sustainable modes, so to achieve this ambitious target we will need to work with TfL and other partners to facilitate a significant shift in travel choices and behaviour. The most effective way to achieve this will be through the implementation of a comprehensive package of transport measures that offer improved sustainable travel options alongside measures to better manage car use, parking and deliveries, including through a transition to low emissions vehicles.
- 16.1.3 The transport policies set out in this chapter have cross cutting objectives with other policies in Merton's local plan, in particular those on health and wellbeing, air quality and climate change. Enabling residents to make more active travel choices as part of their daily lives will play an important role in improving health and wellbeing. A shift to sustainable travel modes and lower emissions vehicles will also be vital enable Merton to decarbonise it's activities by 2050 and to reduce air pollution to within legal limits.

Transport and growth

- 16.1.4 Merton is due to grow significantly over the plan period and integrating land use change with transport will be essential to unlock the potential for growth in a sustainable way that does not have a detrimental impact on the transport network. The London Plan sets out that to enable sustainable growth requires an ambitious aim to reduce dependency on cars in favour of increased walking, cycling and public transport use. The Mayor's transport principles for good growth are:
- Good access to public transport.
 - High density,
 - Mixed-use developments.
 - People choose to walk and cycle.
 - Car-free and car- lite places.
 - Inclusive and accessible design.
 - Carbon-free travel and efficient freight.
- 16.1.5 Effective spatial planning can reduce the need to travel, particularly by car, by creating complete, compact and well-connected neighbourhoods where people can meet their everyday needs within a short walk or cycle. This approach is often referred to as the "20-minute neighbourhood" and represents a 10 minute walk each way, which research shows is the distance most people are willing to walk to access daily services (a 10-minute walk equates to a distance of approximately 800m).
- 16.1.6 The period when new development first becomes operational presents the ideal opportunity to influence travel patterns towards sustainable choices before residents, employees or other visitors have developed established long term travel behaviours. It is therefore essential that development is located and designed to make active and sustainable travel modes a convenient and attractive choice and to reduce reliance on car journeys from the outset.

16.1.7 Focusing and intensifying significant new development around stations and town centres with a good range of transport options, can both reduce the need to travel by providing access to key local services and enable longer distance travel by public transport. Many parts of Merton benefit from good access to public transport, with the borough served by 10 mainline rail stations, London Underground services, London Trams and a network of 28 bus routes. To ensure future development is sustainable whilst maximising opportunities for growth, development opportunities will be intensified around locations with the good public transport accessibility, particularly the opportunity areas of Wimbledon, Colliers Wood and Morden.

Changing travel patterns

16.1.8 Fundamental changes to the way we shop, socialise and work driven by technological change also have an associated impact on travel behaviour including through increased remote working patterns and more home deliveries. These existing trends have been accelerated by the Covid-19 crisis which resulted in some dramatic shifts in travel behaviours during lockdown periods, including a decrease in car and public transport journeys and an increase in local cycling and walking trips. Evidence indicates that the decrease in car journeys during initial lockdown period coincided with a significant drop in local air pollution which provides a demonstration of the positive improvements that can be achieved by a shift in travel behaviour. Emerging evidence indicates that some of the positive changes to travel behaviour such as increased cycling levels, have been retained. However, there are also indications that traffic volumes have grown again to above pre-pandemic levels, which has the potential to further **towards** exacerbate the transport challenges of local road congestion and air pollution.

16.1.9 Any long-term transition to more remote working patterns could have **a** significant positive impact on travel patterns by supporting local services, reducing commuting distances and encouraging more locally based active travel journeys. However, the shift to online shopping, whilst reducing individual shopping journeys, has resulted in a growth of delivery vehicle trips on the network, which will need to be managed more effectively in future to ensure safety and sustainability.

Policy T16.2 Prioritising active travel choices

To encourage and enable active travel choices we will require development proposals to:

- a. Design the layout of development sites in accordance with the [Healthy Streets Approach](#) and prioritise safe and convenient access routes for pedestrians, cyclists and those with disabilities.
- b. Ensure sites connect to and integrate well with the surrounding cycle, pedestrian and public transport networks and make suitable contributions towards improving routes where required.
- c. Protect and enhance any existing publicly accessible cycle and pedestrian routes that cross development sites and maximise opportunities to improve public accessibility by providing new connections through sites.
- d. Provide secure, covered and well-designed cycle parking facilities that meet or exceed London Plan standards (higher level minimum requirements) in accordance with London Plan minimum standards (higher level) and comply with London Cycle Design Standards. Facilities should include provision for charging of electric cycles and a minimum of 5% of cycle spaces should accommodate users of non-standard cycles.
- e. Provide suitable showers, lockers and changing facilities within developments that will provide employment.
- f. Make provision for or a contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes where required.

Justification Supporting Text

Active travel and health outcomes

- 16.2.1 Active travel means making journeys in physically active ways, most commonly by walking or cycling but can also include other modes of travel, such as skateboards and push-scooters. Active travel trips also often form part of a longer public transport journey in order to reach a station or onward destination.
- 16.2.2 Walking and cycling are environmentally friendly, cheap and reliable forms of transport that provide a realistic alternative to the car for many short trips. Active travel choices are one of the easiest ways to integrate regular exercise into a daily routine. Most of the main causes of early death in London are linked to inactivity, including heart disease and cancer (Mayor's Transport Strategy). According to the British Medical Association 30 minutes of moderate exercise four to five days a week can halve the risk of a heart attack. If every Londoner walked or cycled for 20 minutes each day this would save the NHS £1.7 billion in treatment costs over 25 years.
- 16.2.3 The Mayor's Transport Strategy sets a target for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041. However, only around a third of Merton residents do 20 minutes of active travel a day and worryingly, there has been a slight decline over the last five years. The Government's decarbonising transport strategy sets out the aim that half of all journeys in towns and cities will be cycled or walked by 2030. Approximately 30% of Merton residents' daily trips are already conducted by walking but less than 2% by bicycle. TfL research indicates that a significant number of existing short car journeys in Merton could potentially be made by walking or cycling. Merton is a relatively small borough with a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling. There is significant opportunity for more cycle and walking journeys, particularly for shorter trips.

Cycle and pedestrian networks

- 16.2.4 Merton has and will continue to develop cycle and pedestrian routes and facilities as set out in detail in our transport strategy. Existing pedestrian facilities including footpaths, lighting and crossings are generally provided to a high standard and well maintained. The existing cycle network has some sections of marked and fully segregated and off-carriageway cycle lanes routes as well as routes on quieter roads and through low traffic neighbourhoods. There are cross boundary provides links to neighbouring boroughs, including the cycleways and into Central London via the Cycleway from Colliers Wood and from Raynes Park to New Malden. There are pleasant, traffic free walking and cycling routes through the Borough's parks and open

spaces that enable active travel choices by connecting key destinations via convenient shortcuts. In particular the Wandle Trail provides a major active travel route across the borough that connects neighbourhoods including Morden and Colliers Wood.

- 16.2.5 It is, however, recognised that cycle and pedestrian provision in Merton is not of adequate standard in all areas and that significant barriers still exist to cycle and pedestrian journeys, particularly through the severance created by busy roads. We will work with Transport for London, developers and other partners to make further improvements over the plan period with the aim of providing comprehensive cycling and walking networks that enable active travel choices to be made. In order to contribute to the aim set out in the Government's decarbonising transport strategy, to deliver a world class cycling and walking network in England by 2040, Merton will produce cycling and walking strategies by 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period.

NEW PARAGRAPH The Indicative Cycle Network Policy Map includes, but does not differentiate between, a mix of existing routes of varying quality and potential routes that could form part of a future comprehensive cycle network to be delivered by the end of the plan period. The network map includes existing cycle route facilities of an adequate standard (latest existing cycle facilities can be viewed on [Merton's website](#)) and some routes on quieter roads where minimal further intervention would be required. However, some existing routes will require further improvement to achieve the standards set out in the latest best practice guidance. The map includes routes which lack existing cycle provision but that have been identified in TfL's strategic cycling analysis as a priority for cycling interventions or form other key cycling desire lines. However, these are often on busy and constrained corridors and significant further feasibility work and investment will be required to deliver schemes on these routes. In particular, some of the town centres including Wimbledon and Morden are dominated by heavily trafficked gyratory road systems, which create a barrier to cycling and walking, and will require significant improvements to the road layouts and public realm to accommodate cycle routes. The proposed cycle network also includes existing pedestrian links where cycling is currently prohibited but where the route could potentially be enhanced to safely accommodate cyclists.

- 16.2.6 Developments should consider how proposals could contribute towards cycle routes on the indicative cycle network map and should also refer to Merton's and TfL's latest transport strategies and seek to consult with them at an early stage to discuss any requirements in relation to the cycle or pedestrian networks. Development proposals ~~should~~ must maximise opportunities to integrate with and improve cycling and walking networks through financial contributions and/ or providing new routes across development sites and must fully protect and upgrade any existing routes in

accordance with best practice design standards. Proposals for gated developments that prevent public access through development sites by cyclists and pedestrians, will be resisted. Development layouts ~~should~~ must be designed to give priority to pedestrian and cycle movements and should facilitate access to public transport networks. New and improved P pedestrian and cycle-routes should must be provided to a high standard in accordance with the latest best practice guidance (DfT [Cycle infrastructure design LTN 1/20](#) and [TfL Streets Toolkit, including Streetscape Guidance and London Cycling Design Standards](#)).

The Healthy Streets Approach

- 16.2.7 We have adopted TfL's healthy streets approach, which puts people's health at the centre of how streets and public spaces are designed, managed and used. Developments will be expected to demonstrate how their proposals will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. New streets ~~should~~ must respect and link to the local neighbourhood they serve ~~and~~, provide good connections to community facilities and shops, ~~and~~ promote improved travel choice by creating an attractive, permeable, well designed and balanced environment.
- 16.2.8 Most public transport journeys start or finish on foot or by cycle, and half of all walking in London is done to or from public transport stations or stops. The Healthy Streets Approach will deliver integrated improvements to the public transport network and streets to provide an attractive whole journey experience that will facilitate mode shift away from the car.
- 16.2.9 Low traffic neighbourhoods are local streets where through traffic is restricted to reduce car dominance and create safe and pleasant street environments that enable cycling and walking. Merton already has in place successful and long-standing low traffic neighbourhoods and streets in several areas of the borough particularly around Colliers Wood and South Wimbledon. As part of the Healthy Streets Approach, new development ~~will be expected to~~ should adopt the principles of low traffic neighbourhoods and filtered permeability into the site layouts and ~~to~~ integrate with and contribute towards any new or existing schemes on the surrounding street network.

Cycle parking

- 16.2.10 To enable more people to take up or continue to cycle it is important that a sufficient quantity of high-quality cycle parking is provided within new developments in accordance with the higher-level requirements set out in the London Plan. Cycle parking must be easy to access in a convenient location within a development, at ground level wherever possible. The facilities must be secure, covered and be suitable

for people of all ages and abilities, including those who might experience difficulties in lifting a bike or need a specialist cycle. [Further guidance and requirements in relation to the design of cycle parking facilities is provided in Chapter 8 of the London Cycling Design Standards.](#) Development proposals ~~should~~ **must** provide full layout drawings prior to the determination of application, demonstrating that it is possible and easy to manoeuvre bicycles both to and within the proposed cycle parking facilities. In places of employment, supporting facilities ~~should~~ **must** be provided including changing rooms, maintenance facilities, lockers and shower facilities (at least one per ten long-stay spaces).

- 16.2.11 Given the contribution of cycling to sustainable travel, we will generally be supportive bicycle storage units or boxes in front gardens provided they do not impact on residential amenity and are designed in sensitive materials as set out in the Design Policies.
- 16.2.12 Mobility hire services are becoming more mainstream and include dockless electric-bikes and electric-scooters. These innovative services have the potential to provide a cost-effective, sustainable and convenient way of getting around as an alternative to car and public transport use. We support these services where they are appropriately licenced and accredited through nationally recognised organisations, ensure safety for users and other road users and do not undermine take up of active travel. To accommodate these services, we will seek to provide designated dockless parking locations and may require appropriate developments to provide suitable space for this purpose, particularly in town centres where trip generation is likely to be high and alternative available highways space is limited.

Policy T16.3 Managing the transport impacts of development

To manage and mitigate any impacts on the transport network in an efficient, safe and sustainable way, development proposals will be required to:

- a. Submit a transport statement or assessment ~~in accordance with latest TfL guidance~~, which demonstrates that the scale and type of development is appropriate to the transport accessibility of the site and that proposals will not have a detrimental impact on the transport network. Mitigation measures to address adverse transport impacts, including through highways improvements and/ or financial contributions may be required to make the proposals acceptable.
- b. Demonstrate that proposals will not result in any detrimental impact on road safety in accordance with The Mayor's Vision Zero target for road safety.
- c. ~~Demonstrate how trips generated by the development will be managed to maximise sustainable travel patterns and reduce reliance on vehicle trips. Developments that are expected to generate a significant number of trips will be required to~~ develop a Travel Plan. ~~where appropriate and in accordance with TfL's latest guidance, which sets out a strategy for managing trips to the development to maximise sustainable travel patterns.~~
- d. Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
- e. Demonstrate ~~in accordance with TfL's latest Construction Logistics Plan guidance~~, how any impacts on the transport network during the construction phase of the development will be managed and mitigated, with priority given to maintaining safe and inclusive access for pedestrians, cyclists and public transport users. Developments that will have an impact on the transport network during construction will be required to develop a Construction Logistics Plan.
- f. Demonstrate that the proposals and site layout make adequate provision for emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups.
- g. Demonstrate that the development will adequately facilitate efficient, safe and low-emission delivery and servicing trips and develop a Delivery and Servicing Plan where a significant number of delivery trips are expected to be generated.

Justification-Supporting Text

Assessing transport impacts

- 16.3.1 It is important that development proposals fully and carefully assess the projected impacts on the capacity of the transport network at the local, network-wide and strategic level and in relation to all modes of transport. Development proposals will therefore be required to submit either a transport statement where transport impacts are limited or a full transport assessment where the development would be expected to have a significant or strategic transport impact. The transport assessment or statement should be developed in accordance with the latest transport assessment guidance provided by TfL.
- 16.3.2 The transport statement or assessment should demonstrate that the scale and type of development is appropriate to the transport accessibility of the site location. Specifically, significant, high-density development should be located in town centres and other locations that offer sustainable travel choices and reduce the need to travel by car. Any essential development that would be expected to result in large numbers of freight, servicing or delivery movements particularly by heavy goods vehicles, should be located appropriately on the strategic road network and should incorporate measures to support a transition to low carbon vehicle fleets.
- 16.3.3 The Transport Assessment must identify if the transport impacts of a new development are likely to be 'severe' which may lead to the permission being refused unless adequate mitigating measures can be provided to address any adverse transport impacts. Mitigation measures may include financial contributions towards or direct provision of walking and cycling facilities, public transport services and highways improvements. Designs and layouts for new streets or highways improvement schemes should be designed in accordance with the latest best practice guidance.
- 16.3.4 The Transport Statement or Assessment should set out how the development supports the Healthy Streets Approach and The Mayor's Vision Zero target for road safety. Vision Zero sets out a strategy to reduce danger on the streets, so that by 2041 all deaths and serious injuries will be eliminated from London's transport network. The Vision Zero action plan sets out a strategy for making safety improvements to street design, road speeds, vehicles and road user behaviour.
- 16.3.5 Developments that will be expected to generate a significant amount number of journeys to the site by employees, visitors or residents should also submit a travel plan in accordance with TfL's advice and guidance on Travel Plans .latest guidance. A travel plan is a strategy for managing travel to a site through the introduction of a package of measures that support sustainable travel choices.

Construction Logistics

- 16.3.6 The construction phase of developments can present significant logistic and environmental challenges particularly for large, complex and constrained sites or sites that are located in town centres, residential areas or near schools. Construction is likely to generate a significant volume of trips often by heavy goods vehicles that are widely acknowledged to be involved in a disproportionate number of collisions involving cyclists. Development proposals should therefore seek engagement at an early stage of the planning process and set out proposals to ensure that the construction phase it is adequately managed and that risks to the operation and safety of the transport network are mitigated. Proposals should also demonstrate that the transport impacts of the construction phase have been mitigated to maximise sustainability and reduce local air pollution, including through the use of rail or river (via The Thames) freight for significant developments where feasible. Developments that are expected to have a transport impact during construction, will be required to develop a Construction Logistics Plan which reflects the scale, complexity and location of the development and is in accordance with [TfL's Construction Logistics Plan Guidance](#).
- 16.3.7 Developments will be required to obtain the necessary approvals and licences before commencing works on or near publicly maintainable land. It is advised that a minimum of 60 days is given for submission and approvals for all permissions and licences to be assessed and issued. Please contact Merton's Highway Department Network.Co-ordination@merton.gov.uk. To ensure road safety and minimise disruption to road users we may seek a financial contribution via s106 to monitor operations where they are complex.

Deliveries and servicing

- 16.3.8 Freight, servicing and delivery vehicles, particularly heavy goods vehicles are a significant source of noise and air pollution, particularly around commercial and industrial locations. Delivery and servicing trips have been increasing in London due to the rapid market evolution in home delivery for a range of services, which has been accelerated as a result of the Covid-19 pandemic. However, low carbon alternatives such as electric vans and cargo bike deliveries have also started to become more widespread.
- 16.3.9 Where a development is likely to generate a significant amount of movement by goods or delivery vehicles, we will require the development of a Delivery and Servicing Plan in accordance with TfL's latest guidance. A Delivery and Service Plan provides a

strategy to improve the safety, efficiency and sustainability of delivery and servicing vehicles through a range of interventions including consolidation, low carbon delivery modes and the retiming of movements to avoid peak hours. Development involving delivery focused services should provide adequate onsite electric charging infrastructure and parking to support low carbon fleets including e-cargo bikes.

- 16.3.10 Delivery and servicing demands can place additional pressure both on the kerbside and within the site boundary which can impact on road safety, parking and vehicular, cycle and pedestrian access. It is essential that servicing requirements are fully and safely accommodated within site wherever possible and these should be incorporated within the overall design at feasibility stage as it is difficult to modify a site layout post design. In exceptional circumstances, where the developer has justified why it is not feasible to provide some or all of the servicing requirements on site or where potential overspill can reasonably be anticipated, we may seek to introduce parking and loading controls to manage kerb space and will seek an appropriate financial contribution to facilitate this.
- 16.3.11 To help alleviate servicing concerns in relation to refuse, developers are required to provide refuse storage and collection solutions, which are safe, attractive and well-designed. Refuse facilities should be convenient, allow bins to be manoeuvred easily and include sufficient capacity to accommodate increased recycling requirements. For sites with restricted space and access, development proposals should demonstrate that bins will not obstruct adjacent footways or the highway, including by making provision for bins to be relocated to a convenient, suitably sized hardstanding on collection days. We will support underground waste collection systems for major redevelopment schemes provided there is no impact on road safety and where proposed systems are accepted by the council's appointed waste contractor.
- 16.3.12 Coach, shuttle bus and on demand bus services can provide a convenient means to convey people to large sporting/leisure events and major transport terminals so can significantly reduce car journeys and congestion by combining single journeys or drop offs. Development likely to attract coach or shuttle bus trips will be expected to provide appropriate, managed picking up and setting down facilities. Where this not achievable within the site then alternative approaches need to be explored within the Transport Assessment.
- 16.3.13 Taxis, Dial-a-Ride and community transport services can also form an important part of a sustainable transport mix that provides access to occasional vehicle use. Where appropriate to the use, developments should accommodate these modes on site and provide appropriate EV charging facilities.

Policy T16.4 Parking and Low Emissions Vehicles

Development proposals should manage car use and parking to ensure safety, reduce reliance on car use and support a transition to lower emissions vehicles.

- a. Developments should provide the minimum level of car parking necessary taking into consideration the site accessibility by public transport (PTAL), in accordance with London Plan parking standards. Developments in areas with good transport accessibility, including town centres, will be expected to be car free.
- b. All new development in Controlled Parking Zones, including conversions to multiple dwellings will be permit free, with occupants being ineligible to apply for on-street parking permits.
- c. Financial contributions will be sought for new or enhanced parking controls where they are considered necessary to promote road safety and protect existing residential or business amenity.
- d. Disabled persons' parking should be provided in accordance with London Plan standards and should ~~have regard to meet~~ design guidelines, be accommodated within the development site where possible and be provided with electric vehicle charge points.
- e. Development that provides on-site car parking should provide adequate suitable infrastructure for the charging of electric vehicles, ~~in accordance with~~ which meets or exceeds London Plan standards ~~as a minimum.~~
- f. Residential developments that provide parking will be expected to support car club use as an alternative to car ownership, by funding a free trial use package for new residents and by allocating on-site parking space to car club vehicles where appropriate.
- g. Development that provides on-site car parking provision should develop a Parking Design and Management Plan. ~~which demonstrate how it will be designed and sustainably managed in accordance with TfL's latest Parking Design and Management Plan guidance.~~

Justification-Supporting Text

Car parking standards

- 16.4.1 Vehicles take up a lot of street space and high levels of car ownership and use have resulted in many of the borough's roads becoming congested and dominated by parked cars. Reducing levels of car ownership can free up space on both development sites and on the highway for other more efficient and sustainable uses. We will therefore support and apply the approach set out in the London Plan of restricting car parking provision to restrain car use and will apply the London Plan maximum car parking standards for all use classes.
- 16.4.2 We will expect and support car free development for all development proposals in locations that will be well connected by public transport. In accordance with London Plan standards, all developments with a PTAL rating of 5- 6 must be car free. Car free development may also be considered or required in other locations on a case-by-case basis where it can be adequately demonstrated that sufficient sustainable travel choices will be available including where funded improvements to public transport are put in place to raise the Public Transport Accessibility Level (PTAL). ~~with developments elsewhere~~ Developments in less accessible locations with a low PTAL rating should be designed to provide the minimum necessary amount of parking in accordance with London Plan standards ('car-lite').
- 16.4.3 Parking requirements for developments in areas of poor public transport outside of CPZs (Controlled Parking Zones) should more sympathetically balance the need to restrain generation of car trips with the impact of overspill parking on neighbouring areas. Development which is likely to increase on-street parking demand in the surrounding area will be expected to undertake parking surveys to assess potential impacts. Where required a financial contribution may be sought to introduce or enhance local parking control measures around the development site.

Permit free development

- 16.4.4 To mitigate highway impacts we will ensure that all new development in CPZs is permit free, with future occupants being ineligible to apply for on-street parking permits, to be secured through legal agreement. The accumulation of residential conversions to multiple residential properties can place increased pressure on CPZs, so any new dwellings created through conversions, will also be expected to be permit free.
- 16.4.5 The conversion of front gardens to parking could be viewed as supporting increased car use in contradiction to car free development. However, new off-street parking for

existing dwellings may relieve existing on street parking pressures, release kerb space for other sustainable transport uses and better enable residents to charge an EV (Electric Vehicle), so support a transition to low-emissions vehicles. We will therefore not object to proposals for the creation of new driveways provided ~~proposals they~~ do not compromise highway safety and do not contribute to flood risk by ensuring surfacing materials are permeable (see [Merton's guidance on vehicle crossovers](#) and the flood risk policies in this Local Plan and [Merton's Sustainable Drainage SPD](#) for further policy direction and guidance on managing water runoff and flood risk).

Parking for people with disabilities

- 16.4.6 It is recognised that some people with disabilities will rely on car travel more than others, whether as a passenger or a driver, so disabled persons' parking should be provided for new developments. The amount of disabled persons parking provision should be provided as set out within the London Plan standards and should be included within maximum parking provision not in addition to it.
- 16.4.7 It is essential that disabled parking facilities are fully accommodated on site wherever possible and should be incorporated within the overall design at feasibility stage. The layout of the disabled parking provision should be designed in accordance with recognised design standards to be conveniently located and provide adequate access space. In very exceptional circumstances, where the developer has justified why it is not feasible to provide some or all the disabled parking for the development on site, consideration may be given to accommodating disabled parking on the public highway, subject to an appropriate financial contribution to facilitate this.

Parking management

- 16.4.8 As people take decisions about whether to own a car and what type of car to purchase, having a comprehensive and coherent parking management approach and pricing structure in place is essential. Where public or communal car parking facilities are provided a Parking Design and Management Plan should be submitted ~~in~~ accordance with TfL guidance and will be secured through planning condition or appropriate legal agreements.
- 16.4.9 Car parking layouts and spaces should be well-designed in accordance with the latest best practice guidance to provide adequate space and ensure highway safety. Proposals for the management of parking provision should align with Merton's strategic approach for managing parking including through ~~emissions-based~~ appropriate parking charges. Specifically, residential parking spaces should not be bought outright but leased on a regular basis (maximum annually). Employee and shopper parking should be charged appropriately. Parking charges should ideally be

varied to reflect vehicle emissions with low emissions vehicles such as EVs being charged a lower rate.

Car Clubs

- 16.4.10 Car clubs provide an alternative to individual ownership by allowing members to use a car on a pay as you go basis for occasional trips without having the cost or hassle of owning the vehicle. Survey data (CoMo UK 2019) indicates that car club members reduce their private car use and increase their use of sustainable modes. 41% of car club members said they would have bought a new car had they not joined a car club.
- 16.4.11 To reduce levels of car ownership in new development from the outset, we will require residential developments to implement measures to support car club use, including car club membership packages. For large developments we may seek on-site dedicated car club bays, particularly in areas of lower public transport accessibility and where there is a lack of existing car club provision in the vicinity. Car club spaces should be included within the maximum parking provision as set out in the London Plan and not in addition to it. Car club bays should be convenient, accessible by different operating models/operators and be made publicly available at all times ~~for use by neighbouring residents 24/7~~. Car Club operators should be part of a nationally recognised Accredited Scheme. [CoMoUK](#) provide further guidance on car club requirements for new development.

Electric Vehicles

- 16.4.12 Transport is a major producer of the vehicular emissions that contribute towards climate change and cars produce up 19% of Merton's carbon dioxide emissions as a result of the 600 million kilometres driven each year. Transport emissions also account for approximately 60% of the emissions of Nitrogen Dioxide that contribute to local air pollution. Air pollution concentrations in Merton continue to breach the legally binding air quality limits and are particularly high in proximity to busy traffic routes including in the town centres of Morden, Mitcham, Wimbledon and Raynes Park. Air pollutants are recognised as a major contributor to poor health which particularly affects the most vulnerable in society including children, older people, and anyone with long-term health conditions. 6.5% of mortality in Merton is attributable to the harm caused by poor air quality, equivalent to around 75 deaths every year.
- 16.4.13 To address these issues, we will prioritise a reduction in car ownership and use as a holistic solution that also tackles other transport challenges of congestion and road safety. However, it is recognised that there will continue to be some need and demand for car journeys particularly in areas with lower public transport accessibility. We will

therefore support a transition to lower emission vehicles specifically to support a reduction local air pollutants, noise and greenhouse gas emissions.

- 16.4.14 The Government has published a decarbonising transport strategy which includes proposals to increase the uptake of electric vehicles (EVs) and end the sale of new petrol and diesel cars by 2030. ~~are progressing a strategy to significantly increase the uptake of electric vehicles (EVs) over the coming decades and confirmed in November 2020 that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned.~~ The International Council on Clean Transport (ICCT) estimates that the total number of EVs in London will increase by a factor of 30 by 2035 and has assessed that the demand for EV charge points in Merton will increase rapidly during this time. Demand will be met through a mix of charging solutions to serve different needs of users including fast and rapid chargers and lamp column socket slow chargers in residential areas.
- 16.4.15 New development that provides parking provision must provide electric vehicle charging infrastructure appropriate to the scale and type of development which, in accordance with the London Plan, will include active provision for at least 20% of spaces and passive provision for all car parking spaces to enable future installation to meet increased demand for EV charging. Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it. For developments that comprise of a mix of dedicated private parking spaces and communal parking, the London Plan requirement for 20% active EV provision should be fully applied to any communal parking facilities. Developers should also refer to Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles (publishing.service.gov.uk) that may also be applicable to the development. For public car parking facilities, such as at retail facilities, EV infrastructure should include conveniently located fast or rapid charging facilities that enable the public to ~~pay to~~ charge their vehicle on a “pay as you go” basis. Arrangements for the management and operation of EV charging points within communal or public parking facilities should be set out within a Parking Design and Management plan.

Policy T16.5 Supporting transport infrastructure

To protect existing transport infrastructure and to ensure that new infrastructure is provided to support growth and a low carbon future:

- a. Existing land and buildings used for all transport network functions, including public transport services, will be protected from development, unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary.
- b. Land identified for new transport facilities and other related infrastructure will be safeguarded and secured through planning obligation.
- c. Redevelopment of existing public transport sites must demonstrate how services and access for all users will be protected and improved through the provision of new or upgraded facilities and adequately maintained during the construction phase of development.
- d. Development proposals should support capacity, connectivity and other improvements to the bus network and ensure that buses can operate efficiently to, from and within developments, and provide supporting infrastructure as required.
- e. Development proposals for infrastructure required to decarbonise transport operations will be supported.

Justification-Supporting Text

Public transport network

- 16.5.1 Public transport can help to reduce dependency on cars by providing efficient and affordable option for journeys that are either impractical or too long to walk or cycle. Parts of Merton benefit from a good public transport provision principally around the town centres but there are other parts of the borough where accessibility levels remain poor and which are more reliant on local bus services. (see PTAL map).
- 16.5.2 Approximately 30% of Merton residents daily trips are made by public transport (TfL data, based on average daily trips for the period 2017/18 - 2019/20). This comprises approximately 9% of trips made by rail, 9% by underground and 12.5% by bus and tram.
- 16.5.3 For an outer London borough south of the river, Merton's public transport network is relatively good, comprising of Northern and District Line Underground services, mainline rail and tram services. However, crowding is a real problem in the peaks on most routes which can make journey experiences uncomfortable and unpleasant. There are also barriers to accessing public transport for disabled people and those travelling with young children.
- 16.5.4 The Mayors Transport Strategy sets out that significant investment will be needed in the public transport network to improve the customer experience and support anticipated growth without increasing crowding. This policy protects and safeguards existing and potential routes and sites which are required to improve the public transport network and provide the necessary future capacity.

Crossrail 2

- 16.5.5 The South West Main Line into Waterloo that runs through the borough serving Motspur Park, Raynes Park and Wimbledon Stations, is the UK's busiest main line railway which results in severe crowding at peak times. The Mayor's Transport Strategy sets out that proposals for a major new line, Crossrail 2 will be essential to alleviate existing overcrowding and deliver additional capacity from central London to south London and beyond. The Mayor's Transport Strategy states that Crossrail 2 is an infrastructure scheme of national importance which will connect existing national rail lines in Surrey with tunnels from Wimbledon, so will have a significant impact on the borough. The route ~~will~~would increase London's overall rail capacity by 10 per cent and will also reduce demand on the busiest section of the Northern line Morden branch by around 20 per cent.

- 16.5.6 The impact of the Covid 19 pandemic on travel patterns has resulted in uncertainties around the future and financing of the scheme, although TfL still expect that the scheme will be required in the long term. An agreement between the Government and TfL in late 2020 has put the scheme development in good order ~~and prioritised safeguarding to protect the latest proposed route from future development~~ until such time as the scheme can be further progressed. The delivery of Crossrail2 will take place outside this Local Plan period.
- 16.5.7 Some land within the borough has been identified and safeguarded in the [Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015](#). However, none of the ~~sections of~~ route needed to deliver Crossrail 2, south of Wimbledon Town Centre and the onward connection onto the South West Main Line, are formally safeguarded and some of the site allocations within Raynes Park potentially conflict with sites needed to deliver the route.
- 16.5.8 TfL and Merton Council will support the Secretary of State to refresh the safeguarding directions. We will continue to promote discussion with between TfL and developers potentially affected by the proposals at an early stage, including important sites beyond the current safeguarded limits that may be critical for the delivery of this strategic project.

Underground and Suburban Rail Services

- 16.5.9 The Mayor's Transport Strategy proposes upgrades to the Underground network which will enable faster and more frequent services, as well as improved accessibility and a more pleasant travelling environment. Proposals for improvements to the suburban rail network will include an increase in frequency on the "Wimbledon Loop" from 2 to 4 trains per hour, which will significantly improve the existing capacity and the level of service in parts of the borough with stations on this route.
- 16.5.10 There are also planned upgrades to stations to improve safety, convenience and attractiveness. Proposals to provide step free access at stations will improve accessibility to better enable disabled and older people and parents with young children to travel spontaneously and independently. Improvements to the public transport network will also be integrated with schemes to improve the connecting streets and public realm for cyclists and pedestrians, to provide an attractive whole journey experience that will facilitate mode shift away from the car. Where there are development proposals on sites that include or connect to a station, we will seek to secure improvements to accessibility and facilities.

London Trams and Sutton Link

- 16.5.11 Merton is served by London Trams that provides a major orbital link between Wimbledon and Croydon Town Centre via Mitcham. However, the service suffers from over-crowding at peak times and a significant capacity increase is needed to accommodate the anticipated growth in homes and jobs in south London, without reliance on the car. The Mayor's Transport Strategy sets out proposals to upgrade the tram system to improve its reliability and to increase its peak frequency and capacity through longer trams, an expanded tram fleet and new tracking including twin tracking between Morden Road and Phipps Bridge tram stops.
- 16.5.12 A proposed new tram service the "Sutton Link" would create a new, direct and quick route between Sutton and Merton that would offer interchange with the existing tram service. Following public consultation in 2019, TfL's preferred option would serve Colliers Wood via St Helier Avenue, Morden Road and Church Road. Work on the Sutton Link project was paused in July 2020 as it had not proved possible to identify the funding needed to deliver the scheme. If circumstances change and new funding opportunities emerge then the case for taking the scheme forward will be reviewed.
- 16.5.13 Other potential tram proposals include an extension to South Wimbledon and a new tram stop to serve Willow Lane Industrial Estate.

Bus services

- 16.5.14 Merton is already served by an extensive network of 28 bus services. However, as set out in the Mayor's Transport Strategy, significant enhancements to bus services will be required to make the bus an attractive alternative option to replace car journeys, particularly in parts of outer London less well served by public transport. The bus network is more flexible than fixed route public transport so can be more responsive to changes in demand as a result of new development by changing or adding services. Demand responsive bus services are being developed to fill accessibility gaps where conventional bus service would not necessarily be viable. Development proposals should consider whether new or improved bus services and facilities are required to better serve existing and potential demand.
- 16.5.15 The Mayor's Transport Strategy sets out an aim for the TfL bus fleet to emit zero exhaust emissions by 2037 at the latest. To accommodate this, existing depot facilities, bus interchanges and stops will progressively need to be adapted to provide the associated electric charging and communication infrastructure.

Cycle and Pedestrian Networks

~~16.5.16 The Policies Map shows Merton's indicative cycle route network to be developed during the plan period. The network will include a mix of types of infrastructure that could include fully segregated or off-carriageway cycle lanes and facilities, routes on quiet residential roads and traffic-free routes. Some sections already have high-quality cycle facilities in place and routes on the quieter roads will require minimal intervention. However, some routes will require significant development or further improvement to achieve the standard required. In particular, some of the town centres including Wimbledon and Morden are dominated by heavily trafficked road systems, which create a barrier to cycling and walking, and will require significant improvements to the road layouts and public realm. Where the proposed cycle network includes pedestrian links where cycling is currently prohibited and cyclists are required to dismount, we will assess whether the route can be enhanced to safely accommodate cyclists including consideration of a "share with care" approach where separate facilities are not feasible. We will conduct further work to produce cycling and walking strategies by 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period and will be published on Merton Council's website. Developers should consult the council at an early stage to discuss any requirements in relation to the cycle or pedestrian network.~~

Proposed transport schemes

16.5.17 The table below sets out the key transport schemes identified in the Mayor's Transport Strategy and London Plan Policy T3 that are relevant to Merton and ~~are required to~~ will deliver an enhanced or expanded travel network ~~and~~ to accommodate growth sustainably. Additionally, a number of locally important proposals are shown. This list is not detailed or exhaustive, so developers should consult TfL's and Merton Council's latest Transport Strategies for up to date details of transport schemes proposed in Merton. Where a scheme could potentially be affected by a proposal, applicants should consult with the council and other relevant authorities, including TfL at an early stage to understand the latest status of the scheme and identify impacts and whether any suitable mitigation is possible. Development proposals should identify new sites or routes that are or will be required for local public transport and active travel connections where appropriate and set them out in a transport assessment or transport statement.

Table 16.1: Indicative list of transport schemes

Proposal Number, Scheme and Location	Proposal Description, Status, Timescale and Funding
<p>TN 1 Crossrail 2</p>	<p>Strategic infrastructure proposal for new underground rail line running across London between Wimbledon and New Southgate/Tottenham Hale with potential ground level links to the wider rail network.</p> <p><u>This scheme is currently unfunded and will not be completed in the lifetime of this Local Plan. Existing safeguarding of the scheme is retained - for the current status and safeguarding of land see https://crossrail2.co.uk</u></p>
<p>TN 2 Rail Service Improvements</p>	<p>Enhanced suburban rail services, particularly to improve the frequency on trains on the Wimbledon loop from 2 tph to 4 tph in each direction throughout the day.</p> <p><u>A study has been conducted by Network Rail (not yet formally published) that includes a proposal to increase the frequency of trains on the Wimbledon loop as a primary recommendation. Although no decision has been made or funding allocated at this stage, this could potentially be implemented by the late 2020s/early 2030s subject to post-COVID recovery and service specification.</u></p>
<p>TN3 Underground upgrades</p>	<p>Upgrades to Underground Services to improve capacity and quality of service.</p> <p><u>A proposed upgrade to the District Line that will increase frequencies to up to 16 trains per hour on the Wimbledon Branch is expected to be delivered by 2024.</u></p>
<p>TN4 Step-free access</p>	<p>Improved station accessibility for all users <u>at public transport stations.</u></p> <p><u>A step free access route for Haydon’s Road Station has been secured through a planning application and Merton is working with the Rail Operator to provide enabling works. The scheme is expected to be completed by 2023.</u></p> <p><u>Includes Motspur Park has secured DfT Access for All funding, is in development and anticipated to be delivered by 2024. For further information see Access for All – improving accessibility at railway stations nationwide - Network Rail. in feasibility /design stage (funded).</u></p> <p><u>Proposals to safeguard Wimbledon Chase Station redevelopment to ensure step free access can be delivered in the future.</u></p> <p><u>Other stations do not have funding secured but consideration will be given to submitting bids for future rounds of Access for All funding in collaboration with Network Rail and Rail Operators. All development sites that could impact on or enable step free access will be required to safeguard potential future routes and schemes, including any redevelopment of Wimbledon Chase Station.</u></p>

<p>TN 5 Sutton Link – Sutton town centre to Colliers Wood</p>	<p>Proposal for a new tram route (unfunded) between Sutton and Colliers Wood. Currently unfunded and unlikely to be completed in the lifetime of this Local Plan. See https://consultations.tfl.gov.uk/trams/sutton-link</p>
<p>TN 6 Improvements to existing Wimbledon to Croydon Tram service</p>	<p>Service improvements including step free access from Dorset Road to Morden Road Tram stop, replacing existing single track with double tracks between Phipps Bridge and Morden Road Tram stops to increase capacity.</p> <p><u>The TfL proposal for twin tracking does not currently have funding allocated, but if funding is secured the current anticipated timescale for delivery is beyond 2031.</u></p>
<p>TN 7 Other tram improvements</p>	<p>Potential new Tram stop at Willow Lane to enhance public transport access to Willow Lane Industrial Estate. <u>This scheme does not form part of TfL’s plans and has no allocated funding, so would only be progressed during the plan period as part of appropriate enabling development and in collaboration with TfL.</u></p> <p>Street running spur extension from Morden Road tram stop. Delivery will require reallocation of road space and local widening secured through negotiation with landowners as opportunities arise. <u>This scheme has no TfL funding currently allocated, but if funding is secured, timescales are anticipated to be beyond 2031.</u></p>
<p>TN 8 Bus Network improvements</p>	<p>Service enhancements to meet existing and future demand, accessible bus stops and bus stop improvements, bus priority schemes, decarbonisation of the bus fleet and exploration of demand-responsive bus services. <u>This is an ongoing annual programme which will be funded directly by TfL with potential S106 developer contributions towards specific service improvements linked to development proposals.</u></p>
<p>TN 9 Wimbledon Town Centre public realm improvements</p>	<p>Major scheme to improve the public realm and accessibility by cycling, walking and public transport, including improvements to the station. Will involve modification of one-way road system, reallocation of road space and schemes for sustainable management of deliveries and servicing.</p> <p><u>This major scheme will require a significant amount of funding from a combination of sources including TfL and/or Government grants, Strategic Community Infrastructure Levy funding and enabling development contributions. As set out the in Future Wimbledon SPD anticipated delivery timescales are from 2025 to 2040.</u></p>
<p>TN10 Morden Town Centre, London Road</p>	<p>Re-prioritisation of road space in favour of pedestrian, cyclists and public transport, improved Station access arrangements and public realm improvement and modification of one-way road system.</p> <p><u>This major scheme will require a significant amount of funding from TfL and enabling development schemes with an anticipated delivery timescale of late 2020s.</u></p>
<p>TN11 Borough-wide walking network</p>	<p>Improvements to the walking network including routes, lighting and crossing facilities <u>including the “missing link” along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth).</u></p> <p><u>Merton will develop a walking strategy by the end of 2023 which will set out more detailed proposals for pedestrian route development and will be implemented on an ongoing basis over the plan period. The programme will be funded by a combination of funding for transport schemes allocated to the borough by TfL and/or Government grants, Strategic</u></p>

	<u>Community Infrastructure Levy funding and S106 developer contributions towards specific schemes linked to development proposals.</u>
TN12 Borough-wide cycle network	<p>Development of a strategic network of cycle routes, including new feeder routes to the Cycle Superhighway <u>and including the “missing link” along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth)</u></p> <p><u>Merton will develop a cycling strategy by the end of 2023 which will set out more detailed proposals for cycle route development and will be implemented on an ongoing basis over the plan period. The programme will be funded by a combination of funding for transport schemes allocated to the borough by TfL and/or Government grants, Strategic Community Infrastructure Levy funding and S106 developer contributions towards specific schemes linked to development proposals.</u></p>
TN 13 Cycle Parking and Hubs	<p>Upgrades of existing cycle parking facilities and secure cycle parking hubs at Wimbledon, Colliers Wood, Mitcham and Morden.</p> <p><u>Merton will develop a cycling strategy by the end of 2023 which will set out more detailed proposals for cycle parking provision. Schemes will be implemented on an ongoing annual basis over the Local Plan period. The programme will be funded by a combination of funding for transport schemes allocated to the borough by TfL and/or Government grants, Strategic Community Infrastructure Levy funding and S106 developer contributions towards specific schemes linked to development proposals. Developers of key schemes in strategic locations may also be required to include cycle parking hubs within their development proposals.</u></p>
TN 14 EV charging infrastructure	<p>Development of a mix of EV charging infrastructure to facilitate the projected increase in EV ownership.</p> <p><u>Merton will develop an EV strategy by the end of 2022 which will set out more detailed proposals for the provision of EV charging infrastructure. Schemes will be implemented on an ongoing basis over the plan period, including through the provision of charging infrastructure secured through development proposals. The programme will be funded by a combination TfL and/or Government grants and developer and operator funded provision.</u></p>



17. APPENDICES

Open space

These open spaces are illustrated on the Policies Map.

Metropolitan Open Land (MOL)

Site	Name	<u>Neighbourhood Area</u>
1	Cannon Hill	<u>Morden, Raynes Park</u>
2	Wimbledon Park	Wimbledon
3	Lower Morden	Morden
4	Beverly Brook/A3	Raynes Park
5	Copse Hill	<u>Wimbledon, Raynes Park</u>
12	Wimbledon Common	Wimbledon
14	Mitcham Common	Mitcham
16	Morden Park	Morden
18	Wandle Valley	Morden

Open Space - Allotments and Farms

Site	Name	<u>Neighbourhood Area</u>
A001	Western Road Allotments	Mitcham
A002	Martin Way East Allotments	<u>Morden</u> Raynes Park
A003	Eastfields Road Allotments	Mitcham
A004	New Barnes Avenue Allotments	Mitcham
A005	Thurleston Avenue Allotments	Morden
A006	Eveline Road Allotments	Mitcham
A007	Effra Road Allotments	Wimbledon
A008	George Hill, Holne Chase Allotments	<u>Morden</u> Mitcham
A009	Ridge Road Allotments	Mitcham
A010	Cottenham Park Allotments	Wimbledon
A011	Martin Way West Allotments	Morden
A012	Cannon Hill Common Allotments	<u>Morden</u> Raynes Park
A013	Arthur Road Allotments, New Malden	Raynes Park
A014	Tamworth Farm Allotments, Rose Avenue	Mitcham
A015	Phipps Bridge Allotments	Mitcham
A016	Durnsford Road Allotments, Gap Road	Wimbledon
A017	Haslemere Avenue Allotments	Wimbledon
A018	Cannizaro Park Allotments	Wimbledon
A019	Brooklands Avenue Allotments	Wimbledon
A020	Havelock Road Allotments	Wimbledon
F001	Deen City Farm	<u>South Wimbledon</u> Morden

A021	Mary Tate Almshouses Allotments	Mitcham
------	---------------------------------	---------

Open Space - Churchyards and Cemeteries

Site	Name	<u>Neighbourhood Area</u>
C001	Buddhapadipa Temple Grounds	Wimbledon
C002	St Mary's Church, Wimbledon	Wimbledon
C003	Merton & Sutton Joint Cemetery	Morden
C004	Streatham Park Cemetery	Mitcham
C005	London Road/Victoria Road Cemetery	Mitcham
C006	Gap Road (Wimbledon) Cemetery	Wimbledon
C007	Morden Cemetery	Morden
C008	Mitcham Parish Church	Mitcham
C009	St Marys Churchyard, Merton Park	Morden

Open Space – Education

Site	Name	<u>Neighbourhood Area</u>
S001	Ricards Lodge	Wimbledon
S002	Kings College School Playing Field	Wimbledon
S003	Farm Road Playing Fields	Morden
S004	Harris Academy Morden	Morden

Site	Name	<u>Neighbourhood Area</u>
S005	Wimbledon Chase Primary School	Wimbledon
S006	Cranmer Primary	Mitcham
S007	Abbotsbury <u>Primary</u> School	Morden
S008	Raynes Park High School	Raynes Park
S009	Wimbledon High School Sports Ground	Wimbledon
S010	Hillcross Primary School	Morden
S011	Wimbledon College	Wimbledon
S012	Bond Primary School	Mitcham
S013	Haslemere Primary School	Mitcham
S014	Cricket Green School	Mitcham
S015	Harris Primary Academy (Former Garden primary school)	Mitcham
S016	Malmesbury <u>Primary</u> School	Morden
S017	Merton Abbey Primary and Harris Wimbledon Academy	
S018	Benedict <u>Academy Primary School</u>	Mitcham
S020	Stanford Primary School	Mitcham
S021	Priory Church Of England	Wimbledon
S022	Beecholme School	Mitcham
S023	Wimbledon College Sports	Raynes Park
S024	Goals Wimbledon	Raynes Park
S025	St John Fisher School	Raynes Park
S027	Kings College School Sports Ground	Raynes Park
S028	Aragon Primary	Morden
S029	Hatfield Primary School	Morden

Site	Name	<u>Neighbourhood Area</u>
S030	Poplar School	Morden
S031	Rutlish High School	Morden Wimbledon
S032	Harris Academy Merton	Mitcham
S033	St Marks Church of England Academy	Mitcham
S035	Holy Trinity <u>Primary School</u>	Wimbledon
S036	St Thomas Of Canterbury	Mitcham
S037	Liberty Primary School	Mitcham
S038	St Teresa's Primary	Morden
S039	Bishop Gilpin, Lake Road	Wimbledon
S040	Garfield School, Garfield Road	Colliers Wood
S041	Lonesome Primary, Grove Road	Mitcham
S042	Morden Primary School, London Road	Morden
S043	West Wimbledon Primary	Raynes Park
S044	Emmanuel School Playing Fields	Raynes Park
S045	St Matthew's Church of England Primary School (Former Oberon Playing Fields)	Raynes Park
S046	Wimbledon Park Primary School	Wimbledon
S048	Wimbledon College Prep Donhead	Wimbledon
S049	The Norwegian School Playing Fields	Raynes Park
S050	The former Blossom House School Playing Fields, The Drive	Wimbledon
S051	Hollymount Primary School Playing Fields	Wimbledon
S052	Ursuline High School	Raynes Park
S053	Melrose School	Mitcham
S054	St Marks Primary School	Mitcham

Site	Name	<u>Neighbourhood Area</u>
S055	Perseid Upper School Playing Fields (Formerly St Anne's)	Morden
S056	Joseph Hood Primary School	Wimbledon
S057	Merton College	Wimbledon
S058	Sacred Heart Catholic Primary School	Raynes Park
S059	Links Primary School Playing Fields	Mitcham
S060	Gorringe Park Primary School Playing Fields, Sandy Lane	Mitcham
S061	Singlegate Primary School	Colliers Wood
S062	Pelham Primary School, Russell Road	Wimbledon
S063	Merton Park Primary School, Church Lane	Morden
S064	All Saints C of E Primary School, East Road	Colliers Wood
S065	St Mary's RC Primary School	Wimbledon
S066	SS Peter and Paul RC Primary, Cricket Green	Mitcham

Open space - All other open spaces

Site	Name	<u>Neighbourhood Area</u>
CG001	Thompsons Arthur Road Commercial Plan Nurser Motspur Park	Raynes Park
M001	Morden Hall Park	Morden
M002	Figges March	Mitcham
M003	Three Kings Piece	Mitcham
M004	London Road Playing Fields	Mitcham

Site	Name	<u>Neighbourhood Area</u>
M005	Wandle Park	Colliers Wood
M006	Dundonald Recreation Ground	Wimbledon
M007	Cranmer Green	Mitcham
M008	Moreton Green	Morden
M009	Lavender Park	<u>Colliers Wood</u> Mitcham
M010	Durnsford Road Rec	Wimbledon
M011	Haydons Road Rec	Wimbledon
M012	Colliers Wood Rec	Colliers Wood
M013	Cottenham Park	Raynes Park
M014	Donnelly Green Pollard Hill Estate Open Space	Mitcham
M015	Myrna Close Open Space	<u>Colliers Wood</u> Mitcham
M016	John Innes Park	Morden
M017	South Park Gardens	Wimbledon
M018	Cherry Tree Estate Open Space	Mitcham
M019	Cherrywood Open Space	Morden
M020	Brenley Park	Mitcham
M021	Lyndhurst Rec	Mitcham
M022	Holland Gardens	Raynes Park
M023	Sherwood Park Road	Mitcham
M024	Kendor Gardens	Morden
M025	Vestry Hall Green	Mitcham
M026	Rowan Road Rec	Mitcham
M027	Church Lane Playing Fields	<u>Morden</u> Wimbledon
M028	Lynmouth Gardens	Morden

Site	Name	<u>Neighbourhood Area</u>
M029	Deer Park Gardens	Mitcham
M030	Lewis Road Rec	Mitcham
M031	Moreton Green	Morden
M032	Miles Road Open Space	Mitcham
M033	Upper Green (also known as Fair Green	Mitcham
M034	All Saints Rec	Colliers Wood
M035	Nelson Gardens	Colliers Wood
M036	Margin Drive Open Space	Wimbledon
M037	Vectis Gardens	Mitcham
M038	Poplar Court Open Space	Wimbledon
M039	Rock Terrace Rec	Mitcham
M040	Oakleigh Way Recreation Ground	Mitcham
M043	Crooked Billet Open Space	Wimbledon
M044	Wimbledon Common (excluding Royal Wimbledon Golf Course)	Wimbledon
M046	Raynes Park Sports Ground	Raynes Park
M047	Cannon Hill Common	<u>Morden</u> Raynes Park
M048	Sir Joseph Hood Memorial Playing fields	Raynes Park
M049	King Georges Field	Morden
M050	Morden Park	Morden
M051	Mostyn Gardens	Morden
M052	John Innes Recreation Ground	Morden
M053	Ravensbury Park	Mitcham
M054	Cricket Green	Mitcham

Site	Name	<u>Neighbourhood Area</u>
M055	Police Green	Mitcham
M056	Mitcham Common	Mitcham
M057	Mitcham Sports Ground	Mitcham
M058	The Canons	Mitcham
M059	Pollards Hill Open Space	Mitcham
M060	Long Bolstead Rec	Mitcham
M061	Tamworth Farm Rec	Mitcham
M062	Abbey Rec	<u>South</u> Wimbledon
M063	Garfield Road Rec	<u>Colliers Wood</u> <u>Wimbledon</u>
M064	Land Adjacent River Wandle	Colliers Wood
M066	Morden Recreation Ground	Morden
M067	Edenvale Play Area	Mitcham
M068	Wandle Meadow Nature Park	Colliers Wood
M069	St Mary's Church yard and field, Merton Park	Morden
M070	Robinhood Close Open Space	Mitcham
M071	Watermeads	Morden
M072	Joseph Hood Recreation Ground	Morden
M074	Merton & Sutton Joint Cemetery Surrounds	Morden
M075	St Mary's Chuchyard and field	Wimbledon
M076	Rowan Park	Mitcham
M077	Wimbledon Park	Wimbledon
M078	Land adjacent to River Wandle <u>Weir Road</u>	Wimbledon
M078	Seymour Road Park	Wimbledon
M079	Alfreton Close Corner Park	Wimbledon

Site	Name	<u>Neighbourhood Area</u>
M080	Welford Park and Path	Wimbledon
<u>M081</u>	<u>Gap Road Park</u>	<u>Wimbledon</u>
M082	Herbert Road Park	Wimbledon
M083	St Mark's Church	Wimbledon
M084	Edge Hill Court North	Wimbledon
M085	Edge Hill Court South	Wimbledon
M086	All Saints Road Open Space	Wimbledon
M087	Bushey Court Park	Raynes Park
M088	Three Kings Piece Pond and Open Space	Mitcham
M089	Marlowe Square Open Space	Mitcham
M090	Recreation Way Open Space	Mitcham
M091	Crossway Open Space	Raynes Park
M092	Trafalgar Garden	Colliers Wood
M093	Hamilton Gardens Open Space	Colliers Wood
M094	Hardy Gardens Open Space	Colliers Wood
M095	Caesars Walk Open Space	Mitcham
M096	Central Ward Residents Club	Morden
M097	Haynt Walk Open Space	<u>Morden Wimbledon</u>
M098	Botsford Road Open Space	<u>Morden Raynes Park</u>
<u>M099</u>	<u>Trenchard Court, High Homes Open Space Green Lane</u>	<u>Morden</u>
M100	The Precincts Haig Homes Open Space, Green Lane	Morden
M101	St Helier Avenue Open Space	Morden
M102	Home Park Road Open Space	Wimbledon

Site	Name	<u>Neighbourhood Area</u>
M0103	Hertford Way Open Space	Mitcham
M0104	Wimbledon War Memorial	Wimbledon
M0105	Dennis Park Crescent Open Space	Wimbledon
<u>M0106</u>	<u>Stanford Road Play Space</u>	<u>Mitcham</u>
<u>M0107</u>	<u>Land rear of Stanford Primary School</u>	<u>Mitcham</u>
<u>M0108</u>	<u>Seymour Road Park</u>	<u>Wimbledon</u>
P001a	Natwest Sports Ground	Mitcham
<u>P001b</u>	<u>Chilmark Road Open Space</u>	<u>Mitcham</u>
P002	Raynes Park Playing Fields	<u>Morden</u> <u>Raynes Park</u>
P004	Raynes Park High School Sports Ground	Raynes Park
P005	Malden Golf Course	Raynes Park
P006	LESSA Sports Ground, Meadowview Road	Raynes Park
P007	Playing Field Wimbledon College	Raynes Park
P008	The Old Rutlishians Sports Club	Morden
P009	West Side Lawn Tennis Club	Wimbledon
P010	Queensmere Road Tennis Courts	Wimbledon
P012	Wilton Grove Tennis Club	Wimbledon
P014	Raynes Park <u>Lawn Tennis Club Residents Open Space</u>	Raynes Park
P015	West Wimbledon Bowling Club	<u>Raynes Park</u> <u>Wimbledon</u>
<u>P16</u>	<u>Merton Hall Bowling Green</u>	<u>Wimbledon</u>

Site	Name	<u>Neighbourhood Area</u>
P017	Royal Wimbledon Golf Club, Camp Road	Wimbledon
P018	Morley Park	Raynes Park
P020	<u>Old Wimbledonians Sports Ground</u> Civil Service Sports Ground	Raynes Park
P021	Beverley Park Golf Range	Raynes Park
P022	Prince Georges Fields	Morden
P023	Messines Playing Fields	Morden
P024	Old Tenisonians Sports Ground	Raynes Park
P025	Morden <u>Park</u> Playing Fields	Morden
P026	Cranleigh Lawn Tennis Club	Morden
P027	Nursery Road Playing Fields	<u>South</u> Wimbledon
P028	<u>Tooting</u> & Mitcham Imperial Sports Ground	<u>Mitcham</u> Morden
P030	Westminster City School Playing Fields	Mitcham
P033	<u>Kings College School</u> Morden Sports Ground	Raynes Park
P034	The David Lloyd Club	Raynes Park
P035	All England Lawn Tennis Club	Wimbledon
P036	Former St Catherine's Playing Fields	Raynes Park
P037	BMX track	Mitcham
P038	Southey Bowling Club	Raynes Park
<u>P039</u>	<u>Goals Wimbledon</u>	<u>Raynes Park</u>
W001	George Hill Open Space and Pyl Brook Nature Reserve	Morden
W002	Priory Wall Open Space Walk, Priory Road	Colliers Wood
W003	Land Along Wandle River	Wimbledon

Site	Name	<u>Neighbourhood Area</u>
W004	River Wandle riverside walk (also known as Bennett's Hole).	Mitcham
W005	Land Adjacent River Wandle	<u>South Wimbledon Colliers</u> <u>Wood</u>
W006	Merton Park Green Walk	<u>South Wimbledon-Morden</u>
W007	Rookwood Open Space, Rookwood Avenue	Raynes Park

Nature Conservation

These areas of SSSI, SINCs and Local Nature Reserves are illustrated on the Policies Map.

Sites of Special Scientific Interest ('European Sites')

Site	Name	<u>Neighbourhood Area</u>
SSSI	Wimbledon Common	Wimbledon

Sites of Metropolitan Importance for Nature Conservation

Site	Name	<u>Neighbourhood Area</u>
M093	Mitcham Common	Mitcham
M136	Morden Cemetery	Morden
M091	The Upper River Wandle	Morden
M101	Wimbledon Common and Putney Heath	Wimbledon

Sites of Borough (Grade 1) Importance for Nature Conservation

Site	Name	<u>Neighbourhood Area</u>
01	Morden Hall Park and Deen City Farm	Morden
02	Wimbledon Park – Merton section	Wimbledon
03	Royal Wimbledon Golf Course south	Wimbledon
04	Wandle Trail Nature Park and the Lower River Wandle	<u>Colliers Wood Wimbledon</u>
05	Sir Joseph Hood Memorial Wood	Raynes Park
06	Worcester Park Green Lanes	Morden
07	Malden Golf Course and TWU Pipe Track	Raynes Park
08	Cannizaro Park	Wimbledon
09	Morley Park Woodland	<u>Wimbledon Raynes Park</u>
10	Cannon Hill Common	<u>Morden Raynes Park</u>
11	Morden Park	Morden

Sites of Borough (Grade 2) Importance for Nature Conservation

Site	Name	<u>Neighbourhood Area</u>
01A	Streatham Junction to Wimbledon Railsides	<u>Colliers Wood Wimbledon</u>
01B	East Wimbledon Railsides	Wimbledon
01C	District line through Wimbledon	Wimbledon
01D	Wimbledon to Dundonald Road Tramlink	Wimbledon
01E	Railsides west of Wimbledon station	<u>Raynes Park Wimbledon</u>
01F	Sutton Line South of Wimbledon	Wimbledon

Site	Name	<u>Neighbourhood Area</u>
02	Derwent Road Floodwash	Morden
03	Lower Pyl Brook	Morden
04	Pyl Brook Nature Reserve	Morden
05	Beverly Brook in Merton	Raynes Park
06	Oakleigh Way Nature Area	Mitcham
08	Cherrywood	Morden
09	Abbotsbury School Meadowlands	Morden
10	Myrna Close Valley	Colliers Wood
11	Budhhapadipa Temple Grounds	Wimbledon
12	Merton Park Green Walks	Morden
13	Prince Georges Playing Field	Raynes Park
14	Coombe Wood	Wimbledon
15	Ravensbury Park	Mitcham
16	Durnsford Wetland	Wimbledon
17	St Peter and St Paul Churchyard	Mitcham
18	Wandle Park	Colliers Wood
19	London Road Playing Fields	Mitcham

Sites of Local Importance for Nature Conservation

Site	Name	<u>Neighbourhood Area</u>
01	Ricards Lodge High School Park House Middle School	Wimbledon
03	Church Lane Playing Fields	Morden
04	St Mary's Churchyard and Glebe Fields	Morden
05	Poplar First School Nature Area	Morden
06	Eltandia Hall Nature Area	Mitcham
08	Morden Recreation Ground Spinney	Morden
09	Moreton Green	Morden
10	Three Kings Pond and Commonsides Rough	Mitcham
11	Cranmer Green Meadow and Pond	Mitcham
12	Liberty Primary Middle School Conservation	Mitcham
13	The Chase	Wimbledon
14	St Mary's RC Primary School Nature Garden	Wimbledon
16	St Mary's Churchyard	Wimbledon
18	Canons Pond	Mitcham
19	Raynes Park Sports Ground Wildlife Area	Raynes Park
20	Pyl Brook by Garth Road	Morden
21	St Laurence's Churchyard	Morden
22	Haig Homes Estate	Morden
23	Woodmansterne Nature Reserve	Mitcham
24	Bellamy Copse	Mitcham

Local Nature Reserves

Site	Name	<u>Neighbourhood Area</u>
01	Bennett's Hole	Mitcham
02	Cannon Hill Common	Raynes Park
03	Cherry Wood	Morden
04	Cranmer Green	Mitcham
05	Derwent Floodwash (proposed)	Morden
06	Fishponds Wood/ Beverley Meads	Wimbledon
07	Lower Wandle	Wimbledon
08	Merton Green Walks	Morden
09	Morden Park	Morden
10	Myrna Close	Colliers Wood
11	Oakleigh Way	Mitcham
12	Pyl Brook	Morden
13	Ravensbury Park	Mitcham
14	Sir Joseph Hood Memorial Wood	Raynes Park
15	Wandle Meadow Nature Park	Colliers Wood

Green Corridors

These Green Corridors are illustrated on the Policies Map.

Green Corridors

Site	Name	<u>Neighbourhood Area</u>
GC01	Beverley Park	Raynes Park
GC04	Merton Park Railsides	Morden
GC05	Mitcham Common	Mitcham
GC06	Cricket Green & The Canons Recreation Ground	Mitcham
GC08	Mitcham Sports Ground	Mitcham
GC09	Morden Cemetery	Morden
GC10	Morden Park <u>and surrounds</u>	Morden
GC12	Mostyn Gardens	Morden
GC13	Phipps Bridge and London Road Playing Fields	Mitcham
GC14	Ravensbury Park	Mitcham
GC15	Raynes Park High School	Raynes Park
GC16	Raynes Park Railsides	Raynes Park
GC17	Raynes Park Railsides to Motspur Park	Raynes Park
GC18	Ricards Lodge	Wimbledon
GC19	Ridge Road to Wimbledon Park	Wimbledon
GC22	Wimbledon Common	Wimbledon
GC23	Wimbledon Park	Wimbledon
GC24	Wimbledon Railsides	Wimbledon

Conservation Areas, Historic Parks and Gardens and Listed Buildings

Conservation Areas

Code	Name	Area (ha)	Code	Name	Area (ha)
1	Lambton Road	7.65	15	South Park Gardens	13.60
2	Dennis Park Crescent	3.80	16	Wimbledon North	137.80
3	Drax Avenue	8.58	17	Upper Morden	89.20
4	Dunmore Road	1.70	18	Vineyard Hill Road	6.86
5	Bathgate Road	11.45	19	Mitcham Cricket Green <u>(including the Canons)</u>	52.00 <u>(8.4)</u>
6	Bertram Cottages	1.00	20	Westcoombe Avenue	1.70
7	The Broadway	3.00	21	John Innes- Merton Park	30.40
8	Copse Hill	19.72	22	Merton Hall Road	6.28
9	Wimbledon Windmill	1.02	23	Wool Road	13.12
10	Wimbledon Village	6.60	24	Wimbledon West	114.30
11	John Innes- Wilton Crescent	10.37	25	Wandle Valley	93.90
12	Wimbledon Hill Road	11.23	26	Durham Road	3.19
13	Pelham Road	1.50	27	Kenilworth Avenue	2.58
14	Wimbledon Chase	3.25	28	Leopold Road	0.65
			29	The Canons	8.4

Historic Parks and Gardens

Cannizaro Park, Wimbledon	Grade II*
Wimbledon Park, Wimbledon	Grade II*
Morden Hall Park, Morden	Grade II
South Park Gardens	Grade II

List of Buildings of Special Architectural or Historic Interest

The buildings are classified in grades to show their relative importance as follows:

Grade I These are buildings of exceptional interest.

Grade II* (“two stars”): particularly important buildings which are of more special interest.

Grade II: These are buildings of special interest, which warrant every effort being made to preserve them.

Historic England lists buildings and structures and hold the most up-to-date information on listed buildings and structures, which is available via their website:

<https://historicengland.org.uk/listing/the-list/>

Merton contains a rich heritage of buildings, which possess historical or architectural interest. While the most important ones are included on a separate nationally compiled or 'Statutory List', there are many others which may also be said to contribute to the local scene, or which are valued for their local historical associations. Merton's Local List can be found online:

<https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/locally-listed-buildings>

Property	Street/ Road Name	Grade
Church of all Saints	All Saints Road, SW19	II
No.1 (Stag Lodge)	Arthur Road, SW19	II
No.19 (The Artesian Well)	Arthur Road, SW19	II
No.16	Arthur Road, SW19	II
No. 157 (Butcher's Shop)	Arthur Road SW19	II
No.7	Belvedere Drive, SW19	II
No.1	Belvedere Drive, SW19	II
Ice House at No 1	Belvedere Drive, SW19	II
No.12	Belvedere Drive, SW19	II
No.14	Belvedere Drive, SW19	II
No.4	Belvedere Square	II
No.13	Belvedere Square	II
No.5-8 (Consec.)	Belvedere Square, SW19	I
No.9-12 (Consec.)	Belvedere Square, SW19	II
No. 17-20 (Consec.)	Belvedere Square, SW19	II
No. 21-26 (Consec.)	Belvedere Square, SW19	II
No. 27-31 (Consec.)	Belvedere Square, SW19	II
No.13 and 14	Berkeley Place, SW19	II
Wimbledon Theatre	The Broadway, SW19	II
Former Wimbledon Town Hall	The Broadway, SW19	II
No. 21	Calonne Road, SW19	II
No. 28, 30 and 32	Calonne Road, SW19	II
William Wilberforce School	Camp Road, SW19	II

Property	Street/ Road Name	Grade
Statue of Diana with Fawn	Cannizaro Park, Wimbledon, SW19	II
Old School House	Central Road, Morden	II
The Grange	Central Road, Morden	II
Colliers Wood LUL Station	Christchurch Road, Colliers Wood, SW19	II
No.70	Christchurch Road, Colliers Wood, SW19	II
Singlegate School and Gate piers	Christchurch Road, Colliers Wood, SW19	I
Garden Wall (4 sides) Church Field, including iron gate north of Mary's Church	Church Lane, Merton, SW19	II
Church of St Mary	Church Path, Merton, SW19	II*
Freestanding 12C Archway	Church Path, Merton, SW19	II
Garden Wall (4 sites) Church Field, north of St Mary's Church	Church Path, Merton, SW19 duplicate	II
Nos. 60, 62 and 64 with railings and date to No.64	Church Road, Mitcham	II
No.66	Church Road, Mitcham	II
Parish Church of St Peter and St Paul	Church Road, Mitcham	II*
Tomb of Anne Hall (Died 1740)	St Peter and St Paul Churchyard, Church Road, Mitcham	II
Tomb of Thomas Stanley (Died 1811)	St Peter and St Paul Churchyard, Church Road, Mitcham	II
Tomb of Richard Cranmer (Circa Early 19C)	St Peter and St Paul Churchyard, Church Road, Mitcham	II
Table Tomb one yard to west of Tomb of Richard Cranmer	St Peter and St Paul Churchyard, Church Road, Mitcham	II
The Former Vicarage of St Peter and St Paul	Church Road, Mitcham	II
The Old Rectory House	Church Road, Wimbledon	II*
No.16-20 (Even)	Church Road, Wimbledon, SW19	II
No.22-26 (Even)	Church Road, Wimbledon, SW19	II
No.55	Church Road, Wimbledon, SW19	II
No.9 Prospect Housing (including No.11)	Church Road, Wimbledon, SW19	II
No.1 (Newton House)	Commonside East, Mitcham	II
No.54 (Park Place)	Commonside West, Mitcham	II
Cote Cottage	28 Conway Road SW20 Commonside West, Mitcham	II
Christ Church	28 Cottenham Park Road, London, SW20	II
Nos.15 and 17	Copse Hill, SW20	II
No. 11 Colbyfield	Copse Hill, SW20	II
Nos. 19 and 21	Copse Hill, SW20	II

Property	Street/ Road Name	Grade
No.23	Copse Hill, SW20	II
No.27	Copse Hill, SW20	II
No.27 (Formerly Stables)	Copse Hill, SW20	II
No.1 (Elm Lodge)	Copse Hill, SW20	II
Methodist Church	Cricket Green, Mitcham	II
The White House	Cricket Green, Mitcham	II
No.9 (Chestnut Cottage)	Cricket Green, Mitcham	II
Obelisk	Junction with Madeira Road, Cricket Green, Mitcham	II
Tate Almshouses	Cricket Green, Mitcham	II
Drinking Fountain and Horse Trough	Cricket Green, Mitcham	II
Nos. 17-20 (Consec.)	Crooked Billet, SW19	II
Bidder Memorial	Croydon Road, Mitcham	II
Church of the Sacred Heart	Darlaston Road, SW19	II*
Churchyard Wall and Gateways to West and South of Church of Sacred Heart	Darlaston Road, SW19	II
Nos. 47-51	Denmark Road, SW19	II
Nos. 52 and 53	Denmark Road, SW19	II
Nos. 54-59 (Consec.)	Denmark Road, SW19	II
Nos. 60 and 61	Denmark Road, SW19	II
Nos. 62 and 63	Denmark Road, SW19	II
Nos. 64-71 (Consec.)	Denmark Road, SW19	II
Nos. 72 and 73	Denmark Road, SW19	II
No. 2a	Drax Avenue, SW19	II
Horse Trough/ Drinking Fountain	South Park Gardens, Dudley Rd, SW19	II
Former World War 1, Type G, RNAS Seaplane Shed: Network Rail, Wimbledon Depot	Dundonald Road (accessed from)	II
Wimbledon College	Edge Hill	II
Cottage with Cartshed 10 yards to South West of Hall of Wimbledon College	Edge Hill	II
Church of St Barnabas	Gorrington Park Avenue, Mitcham	II
Church Hall of St Barnabas	Gorrington Park Avenue, Mitcham	II
No.1	The Grange, SW19	II
No.2	The Grange, SW19	II
No.7 (Fra Lunor)	The Grange, SW19	II
No.6	The Green, SW19	II
No.7 (Holly Cottage)	The, Green SW19	II
No.2 (Good Hope)	Highbury Rd., SW19	II
No.2 Motor House	Highbury Rd., SW19	II
Wall, West Side of River Pickle	High Street, Colliers Wood, SW19	II

Property	Street/ Road Name	Grade
(Medieval)		
Colliers Wood, LUL Station	High Street, Colliers Wood, SW19	II
Drinking Fountain in Wandle Park	High Street, Merton, SW19	II
South Wimbledon LUL Station	High Street, Merton, SW19	II
Nos 32, 33, 33A and 34	High Street, Wimbledon, SW19	II
No. 35	High Street, Wimbledon, SW19	II
No. 37 and 37A	High Street, Wimbledon, SW19	II
No. 38	High Street, Wimbledon, SW19	II
Nos. 38A, 38B, 38C 39, 39A, 39B (Ashford House)	High Street, Wimbledon, SW19	II
No.44 (Claremount House), 45 and 45A War Memorial	Junction with Parkside, High Street, Wimbledon, SW19	II
Eagle House	High Street, Wimbledon, SW19	II*
Iron Screen <u>railings</u> , Gate Piers and Gates to Eagle House	High Street, Wimbledon, SW19	II
No.57 including Nos. 1, 3 and 5 Lancaster Road	High Street, Wimbledon, SW19	II
Nos. 70 and 70A/ 70B	High Street, Wimbledon, SW19	II
No.98	High Street, Wimbledon, SW19	II
267A, 269 (Long Lodge)	Kingston Road, SW19	II
120 (The Manor House)	Kingston Road, SW19	II
Dorset Hall	Kingston Road, SW19	II
K6 Telephone Kiosk (outside 182)	Kingston Road, SW19	II
1, 3 and 5	Lancaster Road, SW19	II
No. 27	Lancaster Road, SW19	II
<u>War memorial, St Winefride's Church</u>	<u>Latimer Road, SW19</u>	<u>II</u>
No. 1	Lauriston Road SW19	II
No. 9	Lauriston Road, SW19	II
No. 15 and 15A	Lauriston Road, SW19	II
No. 17	Lauriston Road, SW19	II
No. 26 (The Village Club)	Lingfield Road, SW19	II
Nos. 109-II1 (Odd)	London Road, Mitcham	II
Clock Tower at Junction with Upper Green East	London Road, Mitcham	II
Nos. 315 Burn Bullock Public House	London Road, Mitcham	II
Nos. 409 and 411(Mitcham Station)	London Road, Mitcham	II
Nos. 475-479 (Odd) (Mill Cottages)	London Road, Mitcham	II
Milestone on Figges Marsh (Opposite Entrance to St James' Road)	London Road, Mitcham	II
No. 244 (Eagle House)	London Road, Mitcham	I
Forecourt Walls, Piers, Railings and Gates of Eagle House	London Road, Mitcham	I
Milestone Opposite Elm Lodge	London Road, Mitcham	II
Nos. 346 and 348	London Road, Mitcham	II

Property	Street/ Road Name	Grade
No. 350 (White Hart Inn)	London Road, Mitcham	II
Nos. 470 and 472	London Road, Mitcham	II
Nos. 482 and 484	London Road, Mitcham	II
Church of St Lawrence	London Road, Morden	I
Tomb in Churchyard, 5 yards South West of Tower	Churchyard of St Lawrence, London Road, Morden	II
Mauvillian Tomb in Churchyard, Church of St Lawrence	Churchyard of St Lawrence, London Road, Morden	II
Headstone to John Howard (D1764) in Churchyard 16 yards to South of South Porch	Churchyard of St Lawrence, London Road, Morden	II
Headstone circa mid to late 18C immediately adjacent to south of Headstone of John Howard in Churchyard of St Lawrence	London Road, Morden	II
Morden Park House including walls and pair of Circular Garden Buildings attached to North West	London Road, Morden	II*
Drinking Fountain and Horse Trough	London Road, Morden	II
Milestone	London Road, Morden	II
Milestone Opposite Elm Lodge	Lower Green West, Mitcham	II
Mitcham Parish Rooms	Lower Green West, Mitcham	II
Remains of Hall Place (Chapel)	Lower Green West, Mitcham	II
<u>Mitcham War Memorial</u>	<u>Lower Green West, Mitcham</u>	<u>II</u>
The Canons	Madeira Road, Mitcham	II*
Dovecote court Adjacent to Pond to South East of the Canons	Madeira Road, Mitcham	II
Obelisk at the junction with Cricket Green (formerly with the ground of the Canons)	Lower Green West, Mitcham	II
Trinity United Reform Church	Mansel Road, SW19	II
Tooting Police Station	Mitcham Road (251), SW17	II
Church of St Winefride	Merton Road, SW19	II
Morden Hall	Morden Hall Park, Morden	II
Gates and Gate Piers to Main Entrance to East of Morden Hall, including attached wall to North	Morden Hall Park, Morden	II
Walls of Walled garden to South of Morden Hall	Morden Hall Park, Morden	II
Morden Cottage	Morden Hall Park, Morden	II
Snuff Mills (Western Block)	Morden Hall Park, Morden	II
Snuff Mills (Eastern Block)	Morden Hall Park, Morden	II
Pedestal and Statue of Neptune 10 yards to South East of Walled Garden	Morden Hall Park, Morden	II
Pedestal and Statue of Venus and	Morden Hall Park, Morden	II

Property	Street/ Road Name	Grade
Cupid 50 yards N. of Morden Cottage		
Morden Lodge	Morden Hall Park, Morden	II
Cast Iron Bridge to rear of Morden Hall	Morden Hall Road (East Site)	II
Milestone (opposite No. 92)	Morden Hall Park, Morden	II
White Cottage	Morden Road, Mitcham	II
Ravensbury Mill	Morden Road, Mitcham	II
South Wimbledon LRT Station including shops	Morden Road, SW19	II
“Flint Barn” No 35	Mostyn Road, Merton Park, SW19	II
No.22	Parkside, SW19	II*
No.36 (Falconhurst)	Parkside, SW19	II
No. 54 (Apostolic Nunciature)	Parkside, SW19	II
Drinking Fountain & Castle Cattle/ Horse Trough	Parkside, SW19	II
No. 25 Well-House in Garden	Parkside, SW19	II
Horse Trough	Parkside, SW19	II
Pelham High School (Downham House)	Pelham Road, SW19	II
No.98 Wandle Villa	Phipps Bridge Road, SW19	II
Fire Station	Queens Road, SW19	II
No. 54	Ridgway, SW19	II
Pair of Gate Piers to No. 54	Ridgway, SW19	II
Nos. 56, 56A, 56C and No. 1 Lauriston Road	Ridgway, SW19	II
No. 70	Ridgway, SW19	II
2 K6 Telephone Kiosks near junction with Murray Road	Ridgway, SW19	II
No. 10 (Wandle House)	Riverside Drive, Mitcham	II
St Luke’s Church	Ryfold Road, Wimbledon Park	II
Queen Alexandra’s Court (North Block)	St Mary’s Road, SW19	II
Queen Alexandra’s Court (North Eastern Block)	St Mary’s Road, SW19	II
Queen Alexandra’s Court (South Eastern Block)	St Mary’s Road, SW19	II
Queen Alexandra’s Court (Southern Block)	St Mary’s Road, SW19	II
Garden Wall to West of Quadrangle forming Queen Alexandra’s Court	St Mary’s Road, SW19	II
Entrance Gates, Gate Piers and Adjoining Walls to Queen Alexandra’s Court	St Mary’s Road, SW19	II
Parish Church of St Mary	St Mary’s Road, SW19	II*

Property	Street/ Road Name	Grade
Churchyard Walls to South of Churchyard of Church of St Mary	St Mary's Road, SW19	II
31B St Mary's Road	St Mary's Road, SW19	II
Ker Vault, 15 yards to South of Chancel	Churchyard of St Mary's Road, SW19	II
Grosvenor Tomb, 5 yards to South of Chancel	Churchyard of St Mary's Road, SW19	II
Tomb, 1 foot to North of Grosvenor Tomb	Churchyard of St Mary's Road, SW19	II
Savage Tomb, 15 yards to South of South Porch	Churchyard of St Mary's Road, SW19	II
Bingham Tomb, 12 yards from Savage Tomb	Churchyard of St Mary's Road, SW19	II
Tomb of Georgina Charlotte Quin, 1 yard to south west of Savage Tomb	Churchyard of St Mary's Road, SW19	II
Tomb of John Tompkins, 3 yards to west of Savage Tomb	Churchyard of St Mary's Road, SW19	II
Headstone to Eades	Churchyard of St Mary's Road, SW19	II
Tombstone of Thomas Lowick, 1 yard to west of south porch	Churchyard of St Mary's Road, SW19	II
Hopkin (Mansel Philipps) Tomb, 25 yards to south west of church tower	Churchyard of St Mary's Road, SW19	II
White Tomb, 5 yards to south west of Hopkins (Mansel Philipps) tomb	Churchyard of St Mary's Road, SW19	II
Tomb of G S Newton, 20 yards north west of Tower	Churchyard of St Mary's Road, SW19	II
Headstone, 2 yards to south of Tower	Churchyard of St Mary's Road, SW19	II
Tomb of Geard de Visme, 10 ft to north of west tower of chapel	Churchyard of St Mary's Road, SW19	II
Tomb of Elizabeth Johnson, 50 yards to North West of Tower	Churchyard of St Mary's Road, SW19	II
Tomb, 5 yards to south of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	II
Table Tomb, 4 yards to East of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	II
Tomb, 5 yards to East of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	II
Hatchet Tomb, 8 yards to East of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	II
Tomb of John Lawson, 6 yards to north of chancel	Churchyard of St Mary's Road, SW19	II
Johnson Tomb, 1 yard to north of Tomb to John Lawson	Churchyard of St Mary's Road, SW19	II

Property	Street/ Road Name	Grade
Mausoleum of Sir Joseph William Bazalgette, 20 yards to North East of Chancel of St Mary's Church	Churchyard of St Mary's Road, SW19	II
Bankes Tomb, 4 yards to north west of Bazalgette Mausoleum	Churchyard of St Mary's Road, SW19	II
Tomb of Joshua Ruddock, 3 yards to north east of chancel	Churchyard of St Mary's Road, SW19	II
Jennings Tomb, 5 yards to south of Bazalgette Mausoleum	Churchyard of St Mary's Road, SW19	II
Tomb of John Teymme, 6 yards to east of chancel	Churchyard of St Mary's Road, SW19	II
Singlegate School	South Gardens, Colliers Wood	II
Lauriston Cottage	Southside Common, SW19	II
Great Hall Range to King's College School	Southside Common, SW19	II
Pillar Box on Pavement to North of King's College School/ Hall	Southside Common, SW19	II
<u>War memorial, King's College School</u>	<u>Southside Common, SW19</u>	<u>II</u>
Church of St John the Baptist	Spencer Hill, Wimbledon, SW19	II
Wall Running Along South Side of Road	Station Road, Merton, SW19	II
Wheel House at Messrs Liberty's Print Works	Station Road, Merton, SW19	II
2 Lampposts outside 12 and 34	Station Road, Merton Abbey, SW19	II
Colour House at Messrs Liberty's Print Works	Station Road, Merton, SW19	II
Nos. 1-5 (Renshaw Corner)	Streatham Road, Mitcham	II
Electricity Sub Station at Junction with Sunnyside Passage	Sunnyside, Wimbledon, SW19	II
Church Hall of St Barnabas' Church	Thirsk Road, Mitcham	II
Clock Tower	Upper Green East, Mitcham	II
No. 55	Upper Green East, Mitcham	II
Nos. 9-13 (Consec.)	Wandle Bank, Colliers Wood, SW19	II
Nos. 16 & 17	Wandle Bank, Colliers Wood, SW19	II
The Manor House (now forming part of the Rutlish School)	Watery Lane, Merton Park, SW19	II
Chester House	West Side Common, Wimbledon, SW19	II
Garden Building and attached Garden Wall to West of Chester House	West Side Common, Wimbledon, SW19	II
No. 4	West Side Common, Wimbledon, SW19	II
No. 6 (West Side House)	West Side Common, Wimbledon, SW19	II
Nos. 7 and 7A (Converted Stable	West Side Common, Wimbledon,	II

Property	Street/ Road Name	Grade
Block adjoining North End of West Side House)	SW19	
Nos. 14-19 Consecutive (Hanford Row)	West Side Common, Wimbledon, SW19	II
No. 23 (Stamford House)	West Side Common, Wimbledon, SW19	II
No. 24 (The Keir)	West Side Common, Wimbledon, SW19	II
<u>Wimbledon Common (King's Royal Rifle Corps) War Memorial</u>	<u>Wimbledon Common, SW19</u>	<u>II</u>
Drinking Fountain at junction with Belvedere Grove	Wimbledon Hill Road, Wimbledon, SW19	II
No. 100 (The White House)	Wimbledon Hill Road, Wimbledon, SW19	II
Base of Windmill at Mill House	Windmill Road, Mitcham, CR4	II
No. 2 (Heathfield House)	Windmill Road, Wimbledon, SW19	II
The Old Windmill	Windmill Road, SW19	II*
Drinking fountain and horse trough	Windmill Road, SW19	II
Wall to rear of Block of Flats, West of Easternmost Block (Partly numbered 9, 11, 15,17) (Medieval)	Windsor Avenue, SW19	II
Wall to rear of Block of the Westernmost Block of Flats (partly numbered 27, 29, 31, 33) (Medieval)	Windsor Avenue, SW19	II
Southside House	Woodhayes Road, Wimbledon, SW19	II*
Coach House to North of Southside House	Woodhayes Road, Wimbledon, SW19	II
No.6 (Gothic Lodge)	Woodhayes Road, Wimbledon, SW19	II
Methodist Church	Worple Road, SW19	II

Archaeological ~~P~~priority ~~Areas~~ zones and ancient monuments

Archaeological Priority ~~Zone~~~~Areas~~ and Scheduled Ancient Monuments have been defined by the Historic England, Greater London Archaeological Advisory Service. Merton has 20 areas designated as Archaeology Priority ~~Zones~~~~Areas~~ (APZAs) arranged under a number of ~~archaeological themes~~~~Tiers~~. ~~Full details of the council's supplementary guidance note on Archaeology can be viewed via: <https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/archaeology/archaeological-priority-zones>~~ ~~Details about the Tier system and the APAs listed below can be viewed via: <https://historicengland.org.uk/content/docs/planning/apa-merton-pdf/>~~

Archaeological Priority ~~Zones~~~~Areas~~ (APZAs)

- ~~Wandle Valley Alluvium~~
- ~~Beverly Brook Valley Alluvium~~
- ~~Wimbledon Common~~
- ~~Mitcham Common~~
- ~~Merton Village~~
- ~~Wimbledon Village~~
- ~~Mitcham Village~~
- ~~Morden Village~~
- ~~Cannon Hill~~
- ~~Lower Morden~~
- ~~West Barnes Farm~~
- ~~Stane Street~~
- ~~Wandle/ Copper Mill Lane~~
- ~~Wandle/ Colliers Wood~~
- ~~Wandle/ Mitcham~~
- ~~Mill Corner~~
- ~~Merton Place~~
- ~~Wimbledon Park House~~
- ~~Morden Hall and Park~~
- ~~Morden Park~~

Tier I

- Caesar's Camp, Wimbledon Common
- Merton Priory
- Morden Park Mound
- Ravensbury Saxon cemetery

Tier II

- Cannizaro

- [Cannon Hill](#)
- [Lavender Park](#)
- [Merton 19th Century Cemeteries](#)
- [Merton Place](#)
- [Merton Village](#)
- [Mitcham](#)
- [Morden](#)
- [Stane Street](#)
- [Wandle Valley / Colliers Wood](#)
- [Wandle Valley / Mitcham](#)
- [Wandle Valley / Morden Hall Park](#)
- [West Barnes Farm](#)
- [Wimbledon Common](#)
- [Wimbledon Park House](#)
- [Wimbledon Village](#)

Tier III

- [Wandle Valley Earlsfield](#)
- [Mitcham Common](#)
- [Beverley Brook](#)

Scheduled Ancient Monuments

- Caesar's Camp, Wimbledon Common
- Merton Priory
- Morden Park Mound

Flooding: Sequential Test and Impact Assessment

The aim of the sequential test is to steer new development to areas with the lowest risk of flooding.

Applying the Sequential Test to individual planning applications in accordance with the National Planning Policy Framework (NPPF). Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the factors detailed in Impact Assessment set out below, it will be refused.

This appendix sets out a summary of what is required for sequential tests and impact assessments. Applicants should ensure that they meet the requirements of the NPPF, national Planning Policy Guidance, Merton's Strategic Flood Risk Assessment (SFRA) and other supporting documents such as the Council's [Sustainable Drainage SPD and Basement SPD](#).

Sequential Test

The following should be included in submitted sequential tests.

- a. Ensure that sites are assessed for their availability¹, suitability² and viability³
- b. Ensure that all in-centre options have been thoroughly assessed before less central sites are considered
- c. Ensure that where it has been demonstrated that there are no town centre sites to accommodate a proposed development, preference is given to edge-of-centre locations which are well connected to the centre by means of easy pedestrian access
- d. Ensure that in considering sites in or on the edge of existing centres, developers and operators have demonstrated flexibility in terms of:
 - I. scale: reducing the floorspace of their development.
 - II. format: more innovative site layouts and store configurations such as multi-storey developments with smaller footprints.
 - III. car parking provisions: reduced or reconfigured car parking areas; and,
 - IV. the scope for disaggregating specific parts of a retail or leisure development, including those which are part of a group of retail or leisure units, onto separate, sequentially preferable sites. We will not seek arbitrary sub-division of proposals.

In considering whether flexibility has been demonstrated, the council will take into account any genuine difficulties which the applicant can demonstrate are likely to occur in operating the proposed business model from a sequentially preferable site, for example where a retailer would be limited to selling a significantly reduced range of products. However, evidence which claims that the class of goods proposed to be sold cannot be sold from the town centre will not be accepted.

Flood Risk Assessments

You need to do a flood risk assessment for most developments within one of the flood zones. This includes developments:

- In flood zone 2 or 3 including minor development and change of use;
- More than 1 hectare (ha) in flood zone 1;
- Less than 1 ha in flood zone 1, including a change of use in development type to a more vulnerable class (for example from commercial to residential), where they could be affected by sources of flooding other than rivers and the sea (for example surface water drains, reservoirs);
- In an area within flood zone 1 which has critical drainage problems as notified by the Environment Agency

Flood Risk Vulnerability and Flood Zone ‘Compatibility’

This table does not show:

- The application of the [Sequential Test](#) which should be applied first to guide development to Flood Zone 1, then Zone 2, and then Zone 3; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;
- The Sequential and [Exception Tests](#) do not need to be applied to [minor developments](#) and changes of use, except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site.

Where a development contains different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.

Flood Risk Vulnerability classification		Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone	Zone 1	√	√	√	√	√
	Zone 2	√	√	Exception Test required	√	√
	Zone 3a [±]	Exception Test required	√	X	Exception Test required	√
	Zone 3b ^π <i>'Functional Flood Plain'</i>	Exception Test required	√	X	X	X
Key: √ Development is appropriate X Development should not be permitted						

± In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

π In Flood Zone 3b (functional floodplain) essential infrastructure that has to be there and has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- Remain operational and safe for users in times of flood.
- Result in no net loss of floodplain storage.
- Not impede water flows and not increase flood risk elsewhere.

Note: The Flood Zones shown on the Environment Agency’s Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to Merton’s Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.

Flood Risk Vulnerability Classification

<p>Essential Infrastructure</p>	<ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which, has to cross the area at risk. • Essentially utility infrastructure which must be, located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood. • Wind turbines.
<p>Highly Vulnerable</p>	<ul style="list-style-type: none"> • Police stations, Ambulance stations and Fire stations and Command Centres, and telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use⁴. • Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as ‘Essential Infrastructure’)
<p>More Vulnerable</p>	<ul style="list-style-type: none"> • Hospitals • Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs, and hotels. • Non-residential uses for health services, nurseries and educational establishments. • Landfill and sites used for waste management facilities for hazardous waste. • Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuations plan.

⁴ For any proposal involving a change of use of land to a caravan, camping or chalet site, or to a mobile home site or park home site, the Sequential Exception Test should be applied.

<p>Less Vulnerable</p>	<ul style="list-style-type: none"> • Police, ambulance and fire stations which are not required to be operational during flooding. • Buildings used for: shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distributions; non-residential institutions not included in 'more vulnerable'; and assembly and leisure. • Land and buildings used for agriculture and forestry. • Waste treatment (except landfill ⁵and hazardous waste facilities). • Minerals working and processing (except for sand and gravel working). • Water treatment works which do not need to remain operational during times of flood. • Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).
<p>Water-compatible Development</p>	<ul style="list-style-type: none"> • Flood control infrastructure. • Water transmission infrastructure and pumping stations. • Sewage transmission infrastructure and pumping stations. • Sand and gravel workings. • Docks, marinas and wharves. • Navigation facilities. • MOD defence installations. • Ship buildings, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. • Water-based recreation (excluding sleeping accommodation). • Lifeguard and coastguard stations. • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms. • Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

⁵ Landfill is as defined in [Schedule 10 of the Environmental Permitting \(England and Wales\) Regulations 2010](#).

Employment opportunities for Merton

Policy EC13.4 “local employment opportunities” sets out the council’s policy to boost job opportunities from major development, commensurate to its scale.

The table below sets out how different scales of development will contribute towards jobs opportunities and business growth in Merton, in line with the council’s planning policy.

Guidance on Employment Opportunities in Merton

	Scale of Development	Requirements
1.	From 10 homes/ 1,000 sq.m of commercial floorspace up to 20 homes/ 2,000 sq.m of commercial floorspace	Applicants are encouraged to advertise employment and business procurement opportunities (including jobs, work experience and apprenticeships for residents): In local newspapers (which are regularly delivered to homes in Merton), in Merton’s job centre plus centres and on local job recruitment sites.
2.	From over 20 homes/ 2,000 sq.m of commercial floorspace up to 50 homes/ 5,000 sq.m of commercial floorspace.	Applicants are encouraged to provide an overall employment contribution of circa 15% of potential jobs created by the proposal towards increasing employment opportunities in Merton through; the supply chain, by creating apprenticeships or by creating jobs in the resultant end use.
3.	From over 50 homes/ 5,000 sq.m of commercial floorspace up to 100 homes/ 10,000 sq.m of commercial floorspace.	Applicants are encouraged to provide an overall employment contribution of circa 20% of potential jobs created by the proposal towards increasing employment opportunities in Merton through; the supply chain, by creating apprenticeships or by creating jobs in the resultant end use.
4.	From over 100 homes/ 10,000 sq.m of commercial floorspace	Applicants are encouraged to submit an Employment Strategy with any planning application to demonstrate that proposals support local employment, skills development and training opportunities.

Marketing and Vacancy Criteria

The following details will be used to assess information submitted with planning applications, where marketing and vacancy evidence is required to be submitted. Applicants should make reference to this criteria before submitting an application.

The minimum period of vacancy/marketing is identified within the relevant Local Plan policies. The council must be satisfied that an active marketing campaign has taken place for all relevant floorspace on a site, for a continuous period, while the premises were vacant.

A marketing report will be required to be submitted to the council for assessment as part of the planning application. The report should include the following information to demonstrate that a thorough marketing campaign was carried out:

- Evidence that the property was registered with at least one reputable local or national commercial property agent. This could include information showing correspondence from the property agent confirming that the marketing has commenced.
- Evidence, through photos that an advertising board was placed on site, in a clearly visible location for the duration of the marketing period.
- Evidence of the property details published through both online and traditional methods, and made available on request, for the duration of the marketing period. The marketing information should include the location and description of the site, size of the property, lawful land use, property type, specification, costs, rent and service charges. This information should clearly show that the property was marketed for the appropriate use, in reference to the relevant Local Plan policy.
- Evidence showing that the marketing was continuous, from the point when the advertisement board was erected or the online ad was posted (not from the point at which the property agent was appointed). The length of the vacancy period must be clearly evidenced e.g. through the submission of correspondence from the property agent.
- Evidence that the property was marketed at a reasonable price that genuinely reflects the market value. This should consider the appropriate use or uses, condition, quality and location of floorspace, including independent professional valuation from at least three agents to confirm the price is reasonable. If a property is in a poor condition, the marketing should include options both with and without refurbishment, and clearly reflect comparable site values.

- Information on enquiries and offers received in response to the marketing. This should include the number of enquiries received, who each enquiry was from (name and type of business), the type of space or use they were interested in, confirmation on whether they viewed the property, confirmation on whether they made an offer, and a reason/s why the enquiry was unsuccessful and why any offers made were declined.
- Evidence that all opportunities to re-let the site have been fully explored.

Glossary

The glossary below should be used as a guide only and should not be considered the source of statutory definitions.

Accessibility

The general term for how easy it is for people to get to places, jobs, homes and services.

Affordable Housing

Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable Housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

- *Social rented housing*: is owned by local authorities and private registered providers, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Community Agency.
- *Affordable rented housing* is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a centre of no more than 80% of the local market rent (including service charges, where applicable).
- *Intermediate housing* is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing.

Archaeological Priority **ZoneArea**

An area which is known to be of archaeological importance due to historic findings, excavations or historical evidence.

Article 4 Direction

A direction which withdraws automatic planning permission granted under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

Biodiversity

This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Blue Infrastructure

Blue Infrastructure refers to urban infrastructure relating to water - comprising of a network of rivers, water spaces, plus the green elements of the built environment, such as street trees, green roofs and Sustainable Drainage Systems, all of which provide a wide range of benefits and services. ~~Blue infrastructure is commonly associated with green infrastructure in the urban setting and may be referred to as blue-green infrastructure when in combination.~~

Building Research Establishment Environmental Assessment Methodology (BREEAM)

An international scheme that provides independent third party certification of the assessment of the sustainability performance of individual buildings, communities and infrastructure projects.

Brownfield Land

Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed-surface infrastructure. The definition covers the curtilage of the development.

Business Improvement Districts (BIDs)

A Business Improvement District (BID) is a defined area within which businesses are required to pay an additional tax (or levy) in order to fund projects within the BID's boundaries.

Capital Asset Value for Amenity Trees (CAVAT)

CAVAT provides a methodology for calculating the monetary value and/or compensation where a tree is felled or damaged. It works by calculating a unit value for each square centimetre of tree stem, by extrapolation from the average cost of a range of newly planted trees. This basic value is adjusted to reflect the degree of benefit that the tree provides to the local population. The adjustment is designed to allow the final value to reflect realistically the contribution of the tree to public welfare through tangible and intangible benefits. For further information see the London Tree Officers Association website at www.ltoa.org.uk/resources/cavat

Carbon dioxide/ Carbon

Carbon is often used to refer to all Greenhouse Gases which cause global warming, for which carbon dioxide is the most significant.

Car Clubs

A Car Club provides its members with quick and easy access to cars for hire. Members can make use of Car Club vehicles as and when they need them.

Centre Hierarchy

The hierarchy of centres in the borough categorises centres and parades into 4 types: Main centres, Local Centres, Neighbourhood Centres and Parades of local importance. They range significantly in size and function. The NPPF requires local planning authorities to define such a hierarchy.

Circular Economy

An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

Climate Emergency Declaration (or declaring a climate emergency)

By declaring a Climate Emergency the Council acknowledges that there is a need to act on the causes and impacts of climate change. As part of Merton's Climate Emergency Declaration, the Council committed towards achieving net-zero carbon emissions for the borough by 2050, and for the Council by 2030.

Combined Heat and Power (also see Decentralised Energy)

The combined production of electricity and usable heat is known as Combined Heat and Power (CHP). Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Communal Heating Systems

A Communal Heating System supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.

Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, as a tool for local authorities to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. It allows local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Community Needs Statement

A document that assesses the proposed loss, reduction or relocation of social and community infrastructure uses.

Community Plan

The Community Plan is the [Merton Partnership](https://www.merton.gov.uk/communities-and-neighbourhoods/community-plan) overall vision for the borough and describes how the Council and its partners will work together with the local community to inform everything they do and put people first. Further information can be found on the Council's website at <https://www.merton.gov.uk/communities-and-neighbourhoods/community-plan>

Comparison Retailing

Comparison Retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

Conservation (Heritage)

The process of maintaining and managing change to a Heritage Asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Area

An area declared by a local planning authority in accordance with the Town and Country Planning Act 1990 (as amended), as being of special architectural, historical or landscape interest, the character or appearance of which it is desirable to preserve or enhance.

Construction and Demolition Waste

This is waste arising from the construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.

Convenience Retailing

Convenience Retailing is the provision of everyday essential items, including foods, drinks, newspapers/magazines and confectionary.

Decentralised Energy Networks

Decentralised energy generation can be described as the generation of energy in the form of heat and electrical power at or near the point of use, delivered to users via distribution pipes. This contrasts with the traditional (and more inefficient) centralised concept, where energy is transported, in some cases, many hundreds of miles from a centralised power station to the point of energy use. Schemes can vary in size from a few dwellings to wider networks.

Density

Is expressed both in terms of dwellings and, to take better account of the needs of different types of household, habitable rooms per hectare.

Designated Heritage Asset

A World Heritage Site, Scheduled Monument, listed building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Developer Contributions

(see Planning Obligations or Community Infrastructure Levy)

Development

This refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to, redevelopment including refurbishment as well as, new development and changes of use. The full definition is set out in Section 55 of the Town and Country Planning Act 1990.

Development Brief

A brief that sets out the vision and parameters for a development site. Apart from its aspirational qualities, a brief includes site constraints and opportunities, infrastructure requirements such as energy and transport, access and planning policies. It also sets out the proposed uses and key design principles and requirements.

Digital Infrastructure

Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

District Centre

District Centres comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library. In Merton, the District Centres are Colliers Wood, Mitcham and Morden.

District Heating Network

A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

Dual Aspect Dwelling

A Dual Aspect Dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.

Edge-of-Centre

For retail purposes, a location that is well connected and up to 400 metres of the primary shopping area. For all other main town centre uses, a location within 400 metres of a town centre boundary. For office development, this includes locations outside of the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of Edge-of-Centre, account should be taken of local circumstances.

Embodied Carbon

The carbon emissions emitted producing a building's materials, their transport and installation on site as well as their disposal at end of life.

Employment Land - *See Offices and Industrial Land*

Energy Assessment

A study which assesses the energy performance of a development against the London Plan and Local Plan energy policies which demonstrates how the development has maximised carbon savings against the Mayor's Energy Hierarchy.

Energy Efficiency

This is about making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience. This does not necessitate the use of less energy, in which respect it differs from the concept of energy conservation.

Energy Hierarchy

The Mayor of London's approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean), the third step is to use renewable energy (be green) and the fourth step is to monitor, verify and report on energy performance (Be Seen).

Energy Use Intensity (EUI)

An annual measure of total energy consumed in a building (kWh/m².yr) which can be estimated at design stage and monitored in-use as energy bills are based on kWh of energy used by the building. It includes regulated (heating, hot water, cooling, ventilation and lighting) and unregulated (plug loads and equipment) energy.

Environmental Impact Assessment (EIA)

A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment. The process of Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

Examination

Undertaken on the 'soundness' of the Submission Local Plan, namely that it is positively prepared, justified, effective and consistent with national policy. The examination is held by an independent inspector appointed by the Secretary of State.

Extra Care

Extra Care is housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings and where they have agreements that cover the provision of care, support, domestic, social, community or other services. This helps people to live independently, avoiding the need to move into a residential care setting. Schemes vary in scale and nature so an assessment will be made on a scheme by scheme basis if a proposal is considered as 'extra care', depending on the nature of the housing and its design features, the support services available including how care is bought and provided, and any eligibility criteria for tenants or owners.

Fabric Energy Efficiency (FEE)

Measured in kWh/m².yr and available through the Government's Standard Assessment Procedure, Fabric Energy Efficiency covers space heating and space cooling energy demand.

Family Housing

A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms.

Floodplain

Generally low-lying areas adjacent to a watercourse, tidal lengths of the river or sea, where water flows in times of flood or would flow but for the presence of flood defences.

Flood Defence

Infrastructure used to protect an area against flooding as floodwalls and embankments. Flood Defences are designed to a specific standard of protection (design standard).

Floorspace Gross

All floorspace enclosed within the building envelope.

Floorspace Net (for retail purposes)

Area of a shop that is accessible to the public: sales floor, sales counters, checkouts, lobby areas, public serving and in-store cafes. Excludes good storage, delivery, preparation area, staff offices, staff amenity facilities, plant rooms, toilets and enclosed public stairwells and lifts between floors.

Fluvial Flooding

Flooding resulting from water levels exceeding the bank level of a main river.

Fluvial water

Water in the River Thames and other rivers.

Flood Zones

Zone 1 (Low Probability) - Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)

Zone 2 (Medium Probability) - Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map).

Zone 3a (High Probability) - Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map).

Zone 3b (The Functional Floodplain) - This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. *(Not separately distinguished from Zone 3a on the Flood Map)*

Note: The Flood Zones shown on the Environment Agency's Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to the Merton's Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.

Free Floating Car Sharing Scheme

Schemes where members can pick-up or drop-off designated vehicles in any parking space where they are entitled to park within the scheme operating boundary.

Futureproofing

Ensuring that designs are adaptable and take account of expected future changes. For example, ensuring a heating system is designed to be compatible with future Net-Zero Carbon solutions.

Green Corridors

Relatively continuous areas of open space leading through the built environment, which may link to each other and to Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

Greenhouse Gas

Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Green Infrastructure

Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and Sustainable Drainage Systems, all of which provide a wide range of benefits and services.

Green Space

All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape.

Habitable Rooms

Includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more.

Health Inequalities

Health inequalities are defined by the UK Government as ‘inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants.’

Health Impact Assessment (HIA)

HIAs are a method of estimating the potential health effects of the implementation of a plan or programme where there are likely to be significant impacts.

Heritage Asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage Asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic Environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Those elements of the historic environment that hold significance are called Heritage Assets.

Inclusive Design

Design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity

Industrial Land and Business Parks

Industrial Land and Business Parks are identified in the Local Plan and refer to land used for general industry, warehouses, storage, distribution and logistics and other similar types of industrial employment that may require 24-hour operations and can't be carried out in residential area without detriment to local amenity. Some sui generis uses may be appropriate such as vehicle repair garages, scrap yards, petrol filling stations, builders' merchants.

Infrastructure

Includes transport, energy, water, waste, digital/smart, social and community, and Green Infrastructure.

Infrastructure Delivery Plan (IDP)

The IDP sets out the borough's infrastructure requirements over the lifetime of the Local Plan. It covers a range of social and community infrastructure, emergency services, green infrastructure, utilities and physical infrastructure and transport infrastructure.

Infrastructure Delivery Schedule (IDS)

The IDS, sets out the where, what, why, who and when key infrastructure that is required in the borough will be delivered.

International, national and locally designated sites of importance for biodiversity

All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Listed (Locally) Buildings

These are buildings, structures or features which, whilst not listed by the Secretary of State, are an important part of Merton's heritage due to their architectural, historic or archaeological significance. Locally listed Buildings and structures are approved for inclusion on the list by the Council. In Merton, the criteria used to identify locally listed buildings are: Architectural style, Age and history, Detailing, Group value, building materials, subsequent alterations.

Listed (Statutorily) Buildings

These are buildings included in the list of Buildings of Special Architectural or Historic Interest which is compiled by the Secretary of State for the Environment and is a national list. Listed building consent is required for demolition and for internal as well as external alterations. There are three grades of building on the Statutory List: grade I, Grade II* and Grade II.

Local Centre

Local Centres including a range of small shops and services of a local nature, serving a small catchment within easy walking distance of residential areas. In Merton, the Local Centres as defined on the Policies Map are Arthur Road, Motspur Park, North Mitcham, Raynes Park, South Wimbledon Wimbledon Village.

Local Implementation Plan (LIP) for Transport

Statutory transport plans produced by London boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

Local Nature Reserves (LNR)

This is strictly an area designated under section 21 of the National Parks and Access to the Countryside Act 1949. An LNR is one of several places in a city or town where animals can comfortably reside, and plants can grow wild. Sites are declared LNR's because they have features of special interest and are designated based on English Nature guidelines.

The London Plan

The London Plan is the spatial development strategy for the Greater London area and the Mayor of London is responsible for producing this planning strategy. The London Plan deals with matters of strategic importance to the area and forms part of the Development Plan for the borough.

Major Centre

Major Centres normally have over 50,000 square metres of retail floorspace and their retail offer is derived from a mix of both comparison and convenience shopping. Some Major Centres, which have developed sizeable catchment areas, also have some leisure and entertainment functions. Merton's only Major Centre is Wimbledon town centre.

Merton's Climate Strategy & Action Plan

Developed in response to the Council's declaration of a Climate Emergency, this 30 year plan sets out the key actions required across four thematic areas (the Green Economy, Buildings and Energy, Transport and Greening Merton) to become a net-zero carbon borough by 2050, as well as the actions required to decarbonise the Council's own operations by 2030.

Metropolitan Open Land (MOL)

Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

Mixed Use Development

Development for a variety of activities on single sites or across wider areas such as within centres.

National Planning Policy Framework (NPPF)

The NPPF sets out the Government's planning policies for England and how these are expected to be applied, alongside other national planning policies. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Nature Conservation

Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

Neighbourhood

There are six Neighbourhoods in the borough, which are Colliers Wood, Mitcham, Morden, Raynes Park, South Wimbledon and Wimbledon. These are illustrated on the Policies Map.

It should be noted these six Neighbourhoods are described as 'borough area' or 'sub-areas' in the Merton Borough Character Study SPD, but for the purposes of the Local Plan, they are referred to as Neighbourhoods.

Neighbourhood Parades

Convenience shopping and other services easily accessible to those walking or cycling or those with restricted mobility.

Neighbourhood (Development) Plan

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a designated neighbourhood area and they can allocate sites for development. These are plans on a much smaller scale than the Local Plan and should therefore be about local rather than strategic issues. Neighbourhood planning is optional, and a Neighbourhood Plan can only be written by a designated Neighbourhood Forum for a designated Neighbourhood Area. Neighbourhood Plans, once made, form part of the borough's Development Plan.

Net-Zero Carbon

An activity that causes no net release of carbon dioxide and other Greenhouse Gas emissions into the atmosphere, is considered Net-Zero Carbon. In order to achieve a Net-Zero Carbon balance, carbon emissions must be reduced as close as possible to zero, with any remaining carbon emissions being offset by equivalent carbon sinks.

Net-Zero Carbon Buildings

Net-Zero Carbon policies currently consider a building's regulated emissions and are measured as an improvement against Part L Building Regulations 2013. Under the Mayor's zero carbon policy, development must maximise carbon savings on-site against the Mayor's energy hierarchy, and once this has been achieved, offset any remaining regulated emissions via cash-in-lieu contributions to the Council's Carbon Offset Fund, which is ring fenced to secure delivery of carbon dioxide savings elsewhere in the borough, or via offsite carbon offsetting projects which have been agreed with the Council.

Office

A building or premises falling within the E(g)l or E(c)i Use Class Order.

Open Space

All the land that is predominantly undeveloped, other than by buildings or structures that are ancillary to the open space use, and bodies of water that are indicated as open space on Merton's Policies Map. The definition covers a broad range of types of open space within Merton, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Opportunity Areas

London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.

Out-of-Centre

A location which is not in or on the Edge-of-Centre but not necessarily outside the urban areas.

Part L

Building regulation in England setting standards for the energy performance of new and existing buildings. Currently Part L Building Regulations 2013. The Government is in the process of consulting on changes to Part L for the Future Homes Standard.

Permitted Development Rights

Permitted Development Rights are a national grant of planning permission, which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted Development Rights are subject to conditions and limitations to control impact and to protect local amenity.

Photovoltaics (PV)

The direct conversion of solar radiation into electricity by the interaction of light with electrons in a semiconductor device or cell.

Planning Application

Administrative process where permission is sought from the local authority to carry out development. The form and content of the application is laid down in guidance. Application can be made in outline or detailed form for some categories of development.

Planning Condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990).

Planning Obligation

A legally enforceable obligation entered under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. A Planning Obligation places a charge on the land to which it relates.

Planning Permission

The consent given by the local planning authority for building operations as defined in the Town and Country Planning Act that do not constitute permitted development as defined in the general permitted development order (GDPO) or uses permitted by the use classes order; usually subject to conditions and sometimes a legal agreement.

Planning Practice Guidance (PPG)

The national Planning Practice Guidance was published by Government as a web-based resource in March 2014 (and as amended), adds further context to the NPPF. Local planning authorities should have regard to advice contained in the PPG when developing their plans. The PPG is also a 'material consideration' when taking decisions on planning applications.

Playing Field

The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.

Policies Map

A supporting document illustrating the spatial policies of the adopted plans.

Previously Developed Land

Previously Developed Land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. This excludes land in built-up areas such as private residential gardens, parks, recreation grounds and allotments and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Pluvial Flooding

Flooding from water flow over the surface of the ground often occurs when the soil is saturate and natural drainage channels or artificial drainage systems have insufficient capacity to cope with additional flow.

Primary Shopping Area

Defined area where retail development is concentrated (generally comprising the core and those secondary frontages which are adjoining and closely related to the core shopping frontage).

Priority Habitat

London's priority habitats are those areas of wildlife habitat which are of most importance in London. Most areas of Priority Habitat are protected within Sites of Importance for Nature Conservation.

Priority Species

These are species that are a conservation priority because they are under particular threat, or they are characteristic of a particular region.

Protected Species

Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).

Public Realm

This is the space between and surrounding buildings and open spaces that are accessible to the public and include streets, pedestrianised areas, squares, river frontages etc

Public Transport Accessibility Level (PTAL)

This is a measure of accessibility to the public transport network. For any given point in London, PTALs combine walk time to the network (stations, bus stops) with service wait time at these stops to give an overall accessibility index. This can be allocated to six accessibility levels with one being poor and six being excellent.

Registered Providers

These are normally approved housing associations, who provide social housing for the Council, previously known as Registered Social Landlords. The Registered Providers share the Merton Housing Register and must be approved by the Homes and Communities Agency.

Renewable Energy

Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

Residential Care

Residential care homes are residential developments where several older people live, usually in single rooms, and have access to on-site care services. A home registered simply as a care home will provide personal care only – help with washing, dressing and giving medication. Care homes with nursing provide the same personal care, but also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention for a nurse. Homes registered for nursing care may accept people who just have personal care needs but who may need nursing care in the future. Residential care homes are regulated by the Care Quality Commission.

Retrofitting

The addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

Re-use

The operation or process of checking, cleaning or repairing materials that have been discarded and are waste so that they can be used again for their original purpose as non-waste without any other pre-processing.

Secondary Heat

To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the Underground network) or from heat that exists naturally within the environment (air, ground and water).

Service Retailing

Comprises of uses providing services such as hairdressing, beauty salons, dry cleaning, post office, and clothing hire, opticians and travel agents.

Sequential Test

A planning principle that seeks to identify, allocate or develop certain types or locations of land before others.

Scattered Employment Sites

An employment site that is not a designated employment site (a site that is not a Strategic Industrial Location or Locally Significant Industrial Site) as illustrated in Merton's Policies Map (as amended).

Scheduled Ancient Monument

Scheduled Ancient Monuments are identified by the Secretary of State for Culture Media and Sport under the Ancient Monuments and Archaeological Areas Act 1979. They are monuments of National importance to which statutory protection is afforded.

Site of Importance for Nature Conservation (SINC)

Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs (see below), SINC's are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINC's are set out in Appendix 5 of the Mayor's London Environment Strategy.

Sites of Recognised Nature Conservation Interest

All sites that are designated on the Merton Policies Map as: Sites of Special Scientific Interest (SSSI), Metropolitan, Borough or Local Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR) and Green Corridors.

Site of Special Scientific Interest (SSSI)

Areas of land with ecological or geological interest of national importance. They are designated by Natural England under the Wildlife and Countryside Act (1981 as amended) and have legal protection.

Social and Community Infrastructure

Infrastructure that is available to, and serves the needs of the local community. This covers facilities such as health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as Social and Community Infrastructure.

Standard Assessment Procedure (SAP)

The methodology used by the Government to assess and compare the energy and environmental performance of dwellings against Part L Building Regulations.

SAP Carbon Emission Factors

Factors used to calculate the emissions generated by one unit of heat (kWh) for different fuel types (gas and electricity) in the Government's Standard Assessment Procedure.

Strategic Environmental Assessment (SEA)

Required by European and UK law, SEA is a way of systematically identifying and evaluating the impacts that a plan is likely to have on the environment. The aim is to provide information in the form of an Environmental Report that can be used to enable decision makers to take account of the environment and minimise the risk of the plan causing significant environmental damage. Government guidance advises that where a plan requires both strategic environmental assessment and sustainability appraisal, that the former process should be integrated into the latter.

Strategic Flood Risk Assessment (SFRA)

A Strategic Flood Risk Assessment is a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk.

Sui Generis

Uses which do not fall within any Use Class. Such uses include betting offices / shops, theatres, larger houses in multiple occupation, scrap yards, launderettes, night clubs and pay day loan shops.

Supplementary Planning Documents (SPD)

Documents which add further detail to the policies in the Local Plan. SPDs can be used to

provide further guidance for development on specific sites, or on issues, such as design. SPDs are material considerations in planning decisions but are not part of the statutory development plan. The Mayor of London produces Supplementary Planning Guidance (SPGs) to provide further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself.

Surface Water

Rainwater (including snow and other precipitation) which is on the surface of the ground and has not entered a watercourse, drainage system or public sewer.

Surface Water Attenuation

Mitigation measures for flood prevention and protection from surface water.

Sustainability Appraisal (SA)

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability Appraisal is a systematic appraisal process. The purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

Sustainable Community Strategy (SCS) – *See Community Plan*

Sustainable Drainage Systems (uSUDS)

SUDS mimic nature and typically manage rainfall close to where it falls. SUDS can be designed to transport (convey) surface water, slow runoff down (attenuate) before it enters watercourses, they provide areas to store water in natural contours and can be used to allow water to soak (infiltrate) into the ground or evaporated from surface water and lost or transpired from vegetation (known as evapotranspiration).

Third Generation (3G) playing pitch

A type of artificial grass pitch (AGP) known as 'third generation turf'. With 3G turf, the pile (the artificial grass 'blades') is supported by an infill of rubber crumb. Sports that can use 3G pitches include football, rugby and lacrosse, providing that certain specifications are met for each sport.

Town Centre

Shopping and service area with defined boundaries on Merton's Policies Map. It includes the Primary Shopping Area and areas predominantly occupied by main town centre uses within or adjacent to the Primary Shopping Area. References to Town Centres applies to major centre, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Existing Out-of-Centre developments, comprising or including retail and other town centre uses, do not constitute Town Centres.

Town Centre Type Uses

The uses to which town centre policies apply are:

- Shops and offices
- Leisure and entertainment facilities and the more intensive sport and recreation uses (including restaurants, cafes, cinemas, bars and pubs, night clubs, health and fitness centres, indoor bowling centres and bingo halls)
- Arts, culture and tourism development (including theatres, museums, galleries, concert halls, hotels and conference facilities)

Transport Assessment (TA)

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

Transport Statement (TS)

A simplified version of a Transport Assessment where it is agreed the transport issues arising out of development proposals are limited and a full Transport Assessment is not required.

Travel Plan

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

Tree Preservation Order

A Tree Preservation Order may be made to protect individual trees or groups of trees. The Order gives protection against unauthorised felling, lopping, or other tree works.

Urban Greening

Urban Greening describes the act of adding Green Infrastructure elements. Due to the morphology and density of the built environment in London, green roofs, street trees, and additional vegetation are the most appropriate elements of green infrastructure in the city.

Urban Greening Factor (UGF)

A land-use planning tool to help determine the amount of greening required in new developments.

Urban Heat Island

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

Use Class Order:

The [Town and Country Planning \(Use Classes\) Order 1987 \(as amended\)](#) puts uses of land and buildings into various categories known as 'Use Classes'. "change of use" can occur within the same Use Class or between one Use Class and another. Government can change the Use Class Order. The Planning Portal keeps an up to date record of Use Classes.

https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

Whole Life-cycle Carbon (WLC)

Whole Life-cycle carbon emissions are the total Greenhouse Gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/construction, operation, maintenance and eventual material disposal.

Table showing which Development Plan policies are superseded by this Local Plan

Once adopted the Local Plan will supersede all existing policies in Merton's Core Planning Strategy (2011), Sites and Policies Plan (2014) and the Policies Map (2014).

The following table lists the policies from Merton's Core Planning Strategy (2011), the Sites and Policies Plan (2014) and the Policies Map (2014) which are:

- Superseded by the Local Plan or,
- Not taken forward

The Estates Local Plan (2018) and the South London Waste Plan (2012 and its 2022 review) are not affected. The policies in these documents will not be superseded by the new Local Plan and remain part of Merton's Local Plan.

Core Planning Strategy (2011) policies replaced by the forthcoming Local Plan

<u>Core Planning Strategy policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>Issues and options.</u>	<u>Good growth chapter</u>
<u>Merton's Core Strategy Spatial Vision.</u>	<u>Chapter 01c: Urban development objectives and vision.</u>
<u>Key Diagram (Figure 8.1 Key Diagram).</u>	<u>Figure 1: Merton's spatial strategy.</u>
<u>Policy CS 1 Colliers Wood.</u>	<u>Policy N3.1: Colliers Wood.</u>
<u>Policy CS 2 Mitcham Town Centre.</u>	<u>Policy N4.1 Mitcham.</u>
<u>Policy CS 3 Morden Town Centre.</u>	<u>Policy N5.1; Morden.</u>
<u>Policy CS 4 Raynes Park Local Centre.</u>	<u>Policy N6.1: Raynes Park.</u>
<u>Policy CS 5 Wandle Valley.</u>	<u>Policy O15.6 Wandle Valley Regional Park.</u>
<u>Policy CS 6 Wimbledon Town Centre.</u>	<u>Policy N9.1: Wimbledon.</u>
<u>Policy CS 7 Centres.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 8 Housing Choice.</u>	<u>Strategic Policy H11.1 Housing choice</u>
<u>Policy CS 9 Housing Provision.</u>	<u>Strategic Policy H11.2 Housing provision</u>
<u>Policy CS 10 Accommodation for Gypsies and Travellers.</u>	<u>Policy No. H11.6 Accommodation for Gypsies and Travellers.</u>
<u>Policy CS 11 Infrastructure.</u>	<u>Strategic policy IN 14.1 Infrastructure.</u>
<u>Policy CS 12 Economic Development.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 13 Open space, nature conservation, leisure and culture.</u>	<u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation.</u>
<u>Policy CS 14 Design.</u>	<u>Strategic Policy D12.1 Delivering well-designed and resilient neighbourhoods.</u>
<u>Policy CS 15 Climate Change.</u>	<u>Strategic Policy CC2.1: Promoting Sustainable Design to Mitigate and Adapt to Climate Change.</u>

<u>Policy CS 16 Flood Risk Management.</u>	<u>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage.</u>
<u>Policy CS 17 Waste Management.</u>	<u>Strategic Policy W14.4 Waste Management.</u>
<u>Policy CS 18 Active Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 19 Public Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 20 Parking, Servicing and Delivery.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Chapter 27 Delivery and Implementation (Delivery of the Spatial Strategy and Core Policies).</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>
<u>Chapter 28 Monitoring Framework.</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>

Sites and Policies Plan (2014) policies replaced by the forthcoming Local Plan

<u>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>DM R1 Location and scale of development in Merton's town centres and neighbourhood parades.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R2 Development of town centre type uses outside town centres.</u>	<u>Policy TC 13.6 Development of town centre type uses outside town centres.</u>
<u>DM R3 Protecting corner/ local shops.</u>	<u>Policy TC13.7 Protecting corner / local shops</u>
<u>DM R4 Protection of shopping facilities within designated shopping frontages.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R5 Food and drink / leisure and entertainment uses.</u>	<u>Policy TC13.8 Food and drink / leisure and entertainment.</u>
<u>DM R6 Culture, arts and tourism development.</u>	<u>Policy TC13.9 Culture, arts and tourism development.</u>
<u>DM R7 Markets.</u>	<u>Policy not taken forward.</u>
<u>DM H1 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>	<u>Policy No. H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>
<u>DM H2 Housing mix.</u>	<u>Policy No. H11.3 Housing mix</u>
<u>DM H3 Support for affordable housing.</u>	<u>Policy No. H11.1 Housing choice</u>
<u>DM H4 Demolition and redevelopment of a single dwelling house.</u>	<u>Policy not taken forward.</u>
<u>DM H5 Student housing, other housing with shared facilities and bedsits.</u>	<u>Policy No. H11.5 Student Housing, other housing with shared facilities and bedsits</u>
<u>DM C1 Community facilities.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM C2 Education for children and young people.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM E1 Employment areas in Merton.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E2 Offices in town centres.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E3 Protection of scattered employment sites.</u>	<u>Policy EC13.3 Protection of scattered employment sites</u>

<u>DM E4 Local employment opportunities.</u>	<u>Policy EC.13.4 Local Employment Opportunities</u>
<u>DM O1 Open space.</u>	<u>Policy O15.2 Open Space and Green Infrastructure</u>
<u>DM O2 Nature conservation, trees, hedges and landscape features.</u>	<u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.4 Protection of Trees</u>
<u>DM D1 Urban design and the public realm.</u>	<u>D12.2 Urban design</u>
<u>DM D2 Design considerations in all developments.</u>	<u>D12.3 Ensuring high quality design for all developments</u>
<u>DM D3 Alterations and extensions to existing buildings.</u>	<u>Policy D12.4 Alterations and extensions to existing buildings</u>
<u>DM D4 Managing heritage assets.</u>	<u>Policy D12.5 Managing heritage assets</u>
<u>DM D5 Advertisements.</u>	<u>Policy D12.7 Advertisements</u>
<u>DM D6 Telecommunications.</u>	<u>Policy D12.8 Digital infrastructure</u>
<u>DM D7 Shop front design and signage.</u>	<u>Policy D12.9 Shop front design and signage</u>
<u>DM EP1 Opportunities for decentralised energy networks.</u>	<u>Not taken forward.</u>
<u>DM EP2 Reducing and mitigating noise.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM EP3 Allowable solutions.</u>	<u>Not taken forward</u>
<u>Policy DM EP4 Pollutants.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM F1 Support for flood risk management.</u>	<u>Policy F15.8 Managing Local Flooding</u>
<u>DM F2 Sustainable urban drainage systems (SUDS) and; wastewater and water infrastructure.</u>	<u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u>
<u>DM T1 Support for sustainable transport and active travel.</u>	<u>Policy T16.2 Prioritising active travel choices</u>
<u>DM T2 Transport impacts of development.</u>	<u>Policy T16.3 Managing the transport impacts of development</u>
<u>DM T3 Car parking and servicing standards.</u>	<u>T16.4 Parking, deliveries and servicing</u>
<u>DM T4 Transport infrastructure.</u>	<u>T16.5 Supporting transport infrastructure</u>
<u>DM T5 Access to the Road Network.</u>	<u>Not taken forward</u>
<u>Appendices (A –L).</u>	<u>Chapter 17: Appendices</u>
<u>Policies Map (2014)</u>	<u>Polices Map (submitted 2022)</u>



18. POLICIES MAP



CHAPTER 19. MONITORING

Policy M19.1 Monitoring

Merton Council will demonstrate the delivery of the Local Plan's spatial vision and strategic objectives by monitoring the implementation of policies and infrastructure.

In the event that delivery falls significantly below what is required to achieve the necessary targets, the council will trigger a full or partial review of the plan in order to address the reasons for under-delivery.

Key indicators that may trigger a full or partial review are:

- A failure to demonstrate a 5-year housing land supply in any two successive monitoring years and the two monitoring years following that indicating no potential for recovery.
- Housing completions fall more than 20% beneath the targets in the housing trajectory over any rolling 3-year period.

Supporting Text

- 19.1.1.** Monitoring the Local Plan is crucial to the successful delivery of its vision and strategic objectives.
- 19.1.2.** Section 113 of the Localism Act 2011 sets out the requirements for Authority Monitoring Reports (AMRs). Regulation 34 of The Town and Country Planning (Local Planning) (England) Regulations 2012 provides further detail on these requirements which are also reflected in the National Planning Practice Guidance (NPPG) on Local Plans.
- 19.1.3.** Monitoring is required to ensure that the policies are relevant and effective. Monitoring allows us to understand whether policies have worked as they were intended.
- 19.1.4.** Currently, the council has no reason to believe that the plan will not be implemented in full. However, the council accepts that there could be circumstances where development fails to come forward for a number of reasons, some of which are beyond the control of the council. These could include delivery challenges on a site or a more general slowdown in the economy and its ability to deliver viable development. Where the council can use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

Local Plan monitoring framework

- 19.1.5.** The monitoring framework sets out the monitoring indicators for the Local Plan, which will be reported in the AMR. The AMR is not the only monitoring tool. There are separate monitoring arrangements of other related strategies, for example, the climate change strategy and action plan, and the South London Waste Plan. The monitoring framework below relates to the performance of this Local Plan.
- 19.1.6.** Regular monitoring will include analysis of delivery data and trends. Taking account of changes in legislation at the regional and national level. Reviewing the plan's supporting evidence base where necessary. If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to a full or partial review of the Local Plan and its policies.

Reviewing the plan

- 19.1.7.** As required by the NPPF and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council will initiate a review of the plan within five years of adoption.

Local Plan Monitoring Framework

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<u>Growth Area (Opportunity Area)</u>	<u>London Plan indicative target (up to 2041) to deliver 5,000 new homes and 6,000 jobs (indicative figure).</u>	<u>Cumulative housing completions since OA designation.</u> <u>Cumulative non-residential floorspace approvals and completions since OA designation.</u>
<u>Air quality</u> <u>To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</u>	<u>Number of days p.a. when air pollution is moderate or high for PM10*</u> <u>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre - more than 35 times a year at any measuring site.</u>	<u>Decreasing number of days of high PM10 over a 3-year period.</u>
<u>Biodiversity</u> <u>To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</u>	<u>Changes in areas of biodiversity importance.</u>	<u>No net loss of sites of importance for nature conservation (SINCS).</u>
<u>Land and soil condition and pollutants</u> <u>To conserve Merton's geodiversity and protect soils from development and over intensive use.</u>	<u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u>	<u>NO PLANNING PERMISSIONS GRANTED CONTRARY TO ENVIRONMENT AGENCY ADVICE ON FLOOD RISK AND WATER QUALITY GROUNDS.</u>

<p><u>Sustainable land use</u></p> <p><u>To make the best and most efficient use of land to support sustainable patterns and forms of development.</u></p>	<p><u>Planning permissions granted and completed.</u></p>	<p><u>95% of major planning permissions started within a 3 year period.</u></p>
<p><u>Heritage (including architectural and archaeological heritage)</u></p> <p><u>To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.</u></p>	<p><u>Number of heritage assets on Historic England’s Heritage at Risk Register.</u></p>	<p><u>A reduction in the number of heritage assets on the Heritage at Risk register.</u></p>
<p><u>Flood risk management</u></p> <p><u>To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</u></p>	<p><u>Number of planning permissions granted contrary to Environment Agency advice.</u></p> <p><u>Number and location of Environment Agency flood warnings issued across Merton each year.</u></p>	<p><u>No planning permissions granted contrary to Environment Agency advice.</u></p>
<p><u>Climate change</u></p> <p><u>To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</u></p>	<p><u>Reduction in carbon emissions from new build developments.</u></p> <p><u>Reporting on carbon offsetting proposed where on site reduction is not achievable.</u></p>	<p><u>Year on year decrease in carbon emissions from new development.</u></p> <p><u>Reporting on carbon offsetting in Infrastructure Funding Statement.</u></p>

<p><u>Noise and vibration</u></p> <p><u>To minimise noise, vibration levels and disruption to people and communities.</u></p>	<p><u>An increase in area of the Noise Action planning important areas.</u></p>	<p><u>No increase to area.</u></p>
<p><u>Water quality</u></p> <p><u>To protect and enhance Merton’s water bodies.</u></p>	<p><u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u></p> <p><u>River water bodies classified under the Water Framework Directive to achieve good ecological status.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p> <p><u>No decrease of the Water Framework Directive classification of ‘good’ ecological status.</u></p>
<p><u>Water consumption</u></p> <p><u>Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</u></p>	<p><u>Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.</u></p> <p><u>Number and location of water pollution incidents reported to the Environment Agency across Merton annually.</u></p> <p><u>Water quality status of water bodies across borough.</u></p> <p><u>Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p>
<p><u>Open space and nature</u></p> <p><u>To protect, connect and enhance Merton’s natural environment (including important habitats, species and landscapes) and the services and benefits it provides.</u></p>	<p><u>Net loss of designated open space for development.</u></p> <p><u>Metres of main river improved and restored across Merton.</u></p> <p><u>Biodiversity Net Gain delivered across Merton.</u></p>	<p><u>No net loss of designated open space.</u></p>

<u>delivering a net positive outcome for biodiversity.</u>		
<u>Sustainable transport</u> <u>To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</u>	<u>Overall sustainable mode share.</u> <u>Uptake of low emission vehicles.</u>	<u>Increase in overall sustainable mode share based on a rolling three year average.</u> <u>Increase in registered EV vehicles in Merton – measured annually.</u>
<u>Energy use</u> <u>To manage and reduce demand for energy.</u>	<u>Average percentage improvement over Part L of the Building Regulations.</u>	<u>Compliance with local plan policy.</u>
<u>Health and wellbeing</u> <u>To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</u>	<u>Delivery of healthcare facilities identified in Merton’s Local Plan.</u> <u>Number of people taking up physical activities and stating they are in ‘good health.’</u> <u>Number of Health Impact Assessments (HIA) carried out.</u>	<u>n/a (Monitoring will be reported in the Health and Wellbeing Strategy annual update known as the Merton Story and added to the AMR.)</u> <u>All development proposals that meet the Local Plan policy requirements to submit a Health Impact Assessment.</u>
<u>Housing</u> <u>To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton’s demographic changes and local housing demand.</u>	<u>Progress against borough wide affordable housing targets.</u> <u>Number of homes built each year.</u>	<u>Building regulation M4(3) – 10% of all new build self-contained homes.</u> <u>M4(2) – 90% of all new build self-contained homes.</u> <u>50% of all new homes to be affordable across the plan period.</u> <u>Of affordable homes, 70% to be low-cost rent</u> <u>30% to be intermediate tenure.</u>
<u>Safe environments</u> <u>To contribute to safe and secure environments for</u>	<u>Number of Health Impact Assessments carried out and type of development.</u>	<u>Health Impact Assessments carried out for all developments required by policy.</u>

<p><u>all people including people with Protected Characteristics.</u></p>		<p><u>Increase in % of people feeling safe as measured in Merton Residents Survey.</u></p> <p><u>Yearly decrease in serious crime and crime against people with Protected Characteristics.</u></p>
<p><u>Infrastructure</u></p> <p><u>To ensure that environmental, social and physical infrastructure is managed and delivered to support demographic change.</u></p>	<p><u>Delivery of infrastructure projects identified in the Infrastructure Delivery Plan.</u></p>	<p><u>Number of infrastructure projects delivered.</u></p>
<p><u>Design</u></p> <p><u>To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</u></p>	<p><u>Increase in number of major schemes reviewed by the Design Review Panel at pre – application stage.</u></p>	<p><u>% of planning appeals allowed by the Planning Inspector for applications originally refused for design reasons by the council.</u></p>
<p><u>Local employment</u></p> <p><u>To develop and maintain a healthy labour market.</u></p>	<p><u>Number of people unemployed.</u></p> <p><u>Number of new jobs created.</u></p>	<p><u>% of people unemployed lower than regional and national averages.</u></p> <p><u>Increase in number of new jobs created.</u></p>
<p><u>Education and skills</u></p> <p><u>To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and</u></p>	<p><u>Development of floorspace to meet the needs for pupil places.</u></p> <p><u>Number of 16- 24-year-olds in training or apprenticeships or work programmes.</u></p>	<p><u>Delivery of necessary education floorspace</u></p> <p><u>Yearly increase in the number of apprenticeships or work programmes.</u></p>

<p><u>improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.</u></p>	<p><u>Number of local people employed or in training as part of large or regeneration developments.</u></p>	<p><u>All major developments to provide local people with employment and/or training opportunities.</u></p>
<p><u>Economic growth and town centres</u></p> <p><u>To increase the vitality and viability of existing town centres, local centres and parades.</u></p>	<p><u>Undertake the shopping survey to measure the retail vacancy rate in Merton's town centres below national and regional rates.</u></p>	<p><u>Maintain the retail vacancy rate below national and regional averages in Merton's town centres.</u></p> <p><u>No net loss of employment floorspace in Strategic Industrial Locations.</u></p>

London Borough of Merton

Sustainability Appraisal and Strategic Environmental Assessment
(SEA) supplementary report

Main Modifications for the Local Plan -
Planning Inspector Preliminary Questions

March 2022

1. Non-technical summary

- I This report is a non-technical summary of Merton's Local Plan and Policies Map (herein referred to as 'the Plan') submitted to the Secretary of State on 2 December 2021. In January 2020, the council received a letter from the Planning Inspectorate on [Preliminary Matters for the Council \(INSP01\)](#). The Main Modifications Sustainability Appraisal Report (SA Supplement) has been prepared to provide an overview of the assessment of the Main Modifications to the plan following the Inspectors preliminary questions.
- II As stated in the Inspectors letter (dated 28 January 2022) '*Main Modifications (MM) can only be made to development plan documents where they are necessary for soundness and/or legal compliance, and only where they are recommended by Inspectors appointed to examine them. Moreover, such MM would be subject to public consultation at the appropriate point of the examination, in accordance with the arrangements set out in Section 6 of the Procedure Guide*'.
- III. This report in line with requirements of Annex I of the Strategic Environmental Assessment (SEA). This report supplements the Submission Sustainability Appraisal/Strategic Environmental Report, submitted to the [Secretary of State on 02 December 2021](#). This supplementary report is required to ensure that any potential social, environmental and economic effects of the proposed Main Modifications is examined for, significant sustainability impacts.

Context and legislation

- IV Context and legislation the Submission Sustainability Appraisal report considers in detail the requirements of the SEA Directive, considered as an integral part of the assessment in this Sustainability Appraisal (SA) supplement. These are as follows:
 - a) Contents, main objectives of the Plan and relationship with other relevant plans and programmes
 - b) The relevant aspects of the current state of the environment, and the likely evolution thereof without implementation of the Plan
 - c) The environmental characteristics of the area
 - d) Any existing environmental issues

Sustainability Objectives

- v. The Sustainability Objectives used to assess the sustainability implications of the proposed Main Modifications listed below (Figure 1). These were developed and refined as part of the SA Scoping and preceding SAs to submission stage.

Figure 1: Sustainability Appraisal Objectives

Sustainability Objectives
<p>Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</p>
<p>Biodiversity To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</p>
<p>Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.</p>
<p>Sustainable land use To make the best and most efficient use of land to support sustainable patterns and forms of development.</p>
<p>Heritage (including architectural and archaeological heritage) To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.</p>
<p>Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</p>
<p>Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</p>
<p>Noise and vibration To minimise noise, vibration levels and disruption to people and communities.</p>
<p>Water quality To protect and enhance Merton's water bodies.</p>

<p>Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</p>
<p>Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</p>
<p>Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</p>
<p>Energy use To manage and reduce demand for energy.</p>
<p>Health and wellbeing. To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</p>
<p>Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.</p>
<p>Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.</p>
<p>Infrastructure To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.</p>
<p>Design To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</p>
<p>Local employment To develop and maintain a healthy labour market.</p>
<p>Education and skills To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.</p>
<p>Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.</p>

Sustainability background

- V. This SA/SEA report appraises significant changes, which have not, been appraised previously through the Plan preparation process.

Figure: 2: SA/SEA at each Local Plan process.

Key Appraisal Outputs (publication of SA Reports)	Timescale
SA Scoping Report: SA Tasks A1-A5	2018-2021
SA Report on Issues & Options: SA Tasks B1-B6	Stage 2: November 2018-January 2019 Stage 2a: November 2020-February 2021
SA Report on Pre- Submission: SA Tasks C1 and D1-D2	Subject to councillor decision June and July 2021, (circa July-September 2021 for six weeks)
SA Report on Submission Draft incorporating minor changes: SA Tasks C1 and D1-D2	November 2021.
TBC: SA Tasks C1 and D1-D2	TBC
TBC: SA Tasks C1 and D1-D2	TBC
SA Report on modifications arising from Inspector's Report SA Task D3	TBC
TBC: SA Tasks E1 and E2	TBC

Likely significant effects

- VII As part of the SA process, local authorities are required to determine the likely significant effects of the proposed Main Modifications on the social, environmental and economic sustainability objectives. It is important to note that this appraisal has focused on the impact of the proposed Main Modifications only and not the supporting text or policy to which they relate.

Figure 3: Summary of Main Modification

	Proposed modification	Additional SA needed
<p>Plan period and strategic policies.</p> <p>The Inspector's comments (para 11) - <i>'The Framework requires strategic policies to look ahead over a minimum 15-year period from adoption (at paragraph 22). The Local Plan contains strategic policies and covers the period 2021/22 to 2035/36 (as indicated in Figure 4.2.1 of the plan). However, the plan is unlikely to be adopted until 2022/2023, as hearing sessions would need to avoid the London pre-election period (see also the paragraphs on hearing arrangements, below).'</i></p>	<p>To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year plan period to be 2022/23 - 2036/37.</p>	
<p>National Planning Policy Framework (NPPF).</p> <p><i>The Inspector's comment (Para 18) - 'The revised Framework was published on 20 July 2021 but, as set out above, the date that the Local Plan was published is unclear. Consequently, it may be appropriate for the Council to undertake a check (if not undertaken already), to confirm that the plan is consistent with the latest version of the Framework. The Council should supply us with the suggested wording for any MM which may be needed as a result. As a minimum, proposed changes should ensure that any references to superseded versions of the Framework, and out-of-date paragraph numbers should be updated as appropriate.</i></p>	<p>Amendments made throughout the Plan have been made to clearly state NPPF 2021</p>	<p>No, There are no sustainability implications and no likely effects to the policy or the Plan.</p>
<p>Supplementary Planning Documents (SPD).</p> <p>The Inspector's comment Para 37) - <i>Several policies require developments to meet requirements contained in supplementary planning documents (SPDs) or similar pieces of guidance. These and other pieces of guidance are not development plan documents (DPDs) and thus do not have the statutory force conferred on local plans by virtue of section 38(6) of the 2004 Act.</i></p>	<p>To ensure that the policy is justified and legally sound, all policy requirements to conform to SPD removed or amended.</p>	

VIII. Appendix A show the full list of Main Modification at this stage. These have ‘no sustainability implications’ and ‘no likely effects’ to the policy or the Plan and can be carried forward.

Mitigation measures

IX. Given the limited impact of the Main Modifications on the sustainability objectives, no other mitigation measures are not proposed or needed aside from those already identified in the submission SA.

Selection of alternatives

X. The sustainability appraisal process requires local authorities to consider alternative options, and to assess sustainability implications of these. As the Plan preparation process, alternatives have, been considered during the SA process including the submission sustainability appraisal.

Monitoring

XI. The council will continuously monitor the effects of the policies in sustainability terms and report on the outcome of this through the Authority Monitoring Report (AMR).

SA/SEA Technical report

1 Purpose of sustainability appraisal

- 1.1 This report is a technical report of Merton's Local Plan and Policies Map (herein referred to as 'the Plan') submitted to the Secretary of State on 2 December 2021. In January 2020, the council received a letter from the Planning Inspectorate [Preliminary Matters for the Council \(INSP01\)](#) (dated 28th January). The Main Modifications Sustainability Appraisal Report (SA Supplement) has been prepared to provide an overview of the assessment of modifications (main and additional) of the plan following the Inspectors preliminary questions.
- 1.2 Under [section 20\(7C\) of the 2004 Planning and Compulsory Purchase Act as amended](#)) Main Modifications (changes that materially affect the policies) to make a submitted local plan sound and legally compliant. The council can also put forward additional modifications of its own to deal with more minor matters. These tend to be to provide clarity or can be grammatical edits and changes.
- 1.3 Preparation of this report is in line with requirements of Annex I of the Strategic Environmental Assessment (SEA and supplements the Submission Sustainability Appraisal/Strategic Environmental Report submitted to the Secretary of State on 02 December 2021.
- 1.4 This supplementary report seeks to ensure the potential social, environmental and economic effects of the proposed Main Modifications are considered. Furthermore, also for significant sustainability impacts, and reported on as part of the Plan making process.

Context and legislation

- 1.5 The submission SA/SEA (December 2021) considers in detail the requirements of the SEA Directive, considered as an integral part of the assessment in this SA Supplement. These are as follows:
- a. Contents, main objectives of the Plan and relationship with other relevant plans and programmes
 - b. The relevant aspects of the current state of the environment, and the likely evolution thereof without implementation of the Plan
 - c. The environmental characteristics of the area
 - d. Any existing environmental issues
- 1.6 The remaining requirements of the SEA Directive are explained below

Sustainability Objectives

- 1.7 Sustainability objectives The Sustainability Objectives used to assess the sustainability implications of the proposed Main Modifications and Amendments, listed in figure 1. These were developed and refined as part of the Sustainability Appraisal Scoping process, preceding this report.

Sustainability background

- 1.8 This SA/SEA report appraises significant changes, which, have not, been appraised previously through the Plan preparation process.

Figure 4: SA/SEA timetable and stages

Stage of the plan	Key Appraisal Outputs (publication of SA Reports)	Timescale
Evidence Gathering	SA Scoping Report: SA Tasks A1-A5	2018-2021
Consultation on Issues and Options	SA Report on Issues & Options: SA Tasks B1-B6	Stage 2: November 2018-January 2019 Stage 2a: November 2020-February 2021
Pre-submission publication of draft Local Plan: Proposed Submission	SA Report on Pre- Submission: SA Tasks C1 and D1-D2	Subject to councillor decision June and July 2021, (circa July-September 2021 for six weeks)
Submission of draft Local Plan incorporating minor changes to the Secretary of State	SA Report on Submission Draft incorporating minor changes: SA Tasks C1 and D1-D2	November 2021.

1.9 Collectively, the sustainability reports are prepared in accordance with government guidance on Sustainability Appraisal and incorporate the requirements of the Strategic Environmental Assessment Directive 2001/42/EC

1.10 The council examined Main Modifications to; determine if, any through earlier SA/SEA whether, assessed already and whether an additional appraisal is required. Where it was determined that an additional appraisal of the sustainability effects was required, the appraisal was undertaken using the criteria in figure 6. The assessment used the sustainability objectives and SA framework developed and refined through the Scoping process, used in the all the Plan's SA/SEA since 2018.

2 Appraisal methodology

2.1 The national Planning Practice Guidance (PPG) and best practice provides guidance for the undertaking of the SA. The appraisal methodology outlined below, it ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended. Several guides are available on SA/SEA and the methodologies outlined. The following have informed this SA/SEA where, still applicable:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister (November 2005)

- Practical Guide to the SEA Directive, Office of the Deputy Prime Minister (September 2005).
- Sustainability Appraisal Planning Policy Manual, Planning Advisory Service (2009); and
- Sustainability Appraisal: advice note, Planning Advisory Service (2010).

Figure 5: Sustainability Appraisal process

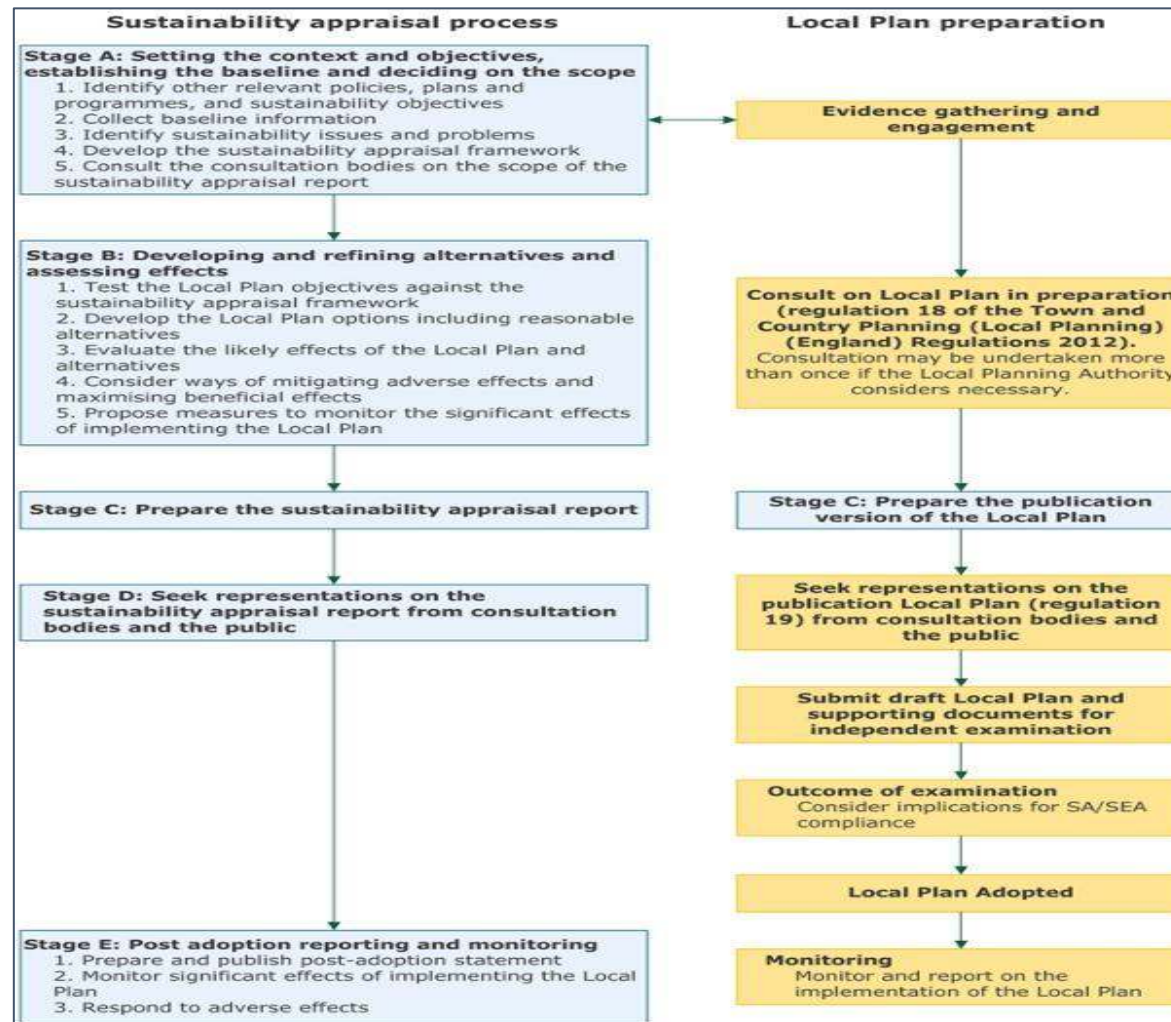


Figure 6: SA scoring matrix (used in all SA/SEAs)

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
	No Significant Effect on Sustainability Objective
-	Minor Negative Effect on Sustainability Objective (normally indirect)
--	Significant Negative Effect on Sustainability Objective (normally direct)
?	Uncertain Effect on Sustainability Objective

2.1 The [National Planning Practice Guidance \(PPG\)](#) states that:

The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.

2.2 The step the council took was to assess each Main Modification to determine whether additional appraisal was required. In addition, whether in earlier SA/SEAs it had been appraised previously

2.3 Where it was determined that an additional appraisal of the sustainability effects was required, the appraisal was undertaken using the criteria in figure 6. The assessment used the sustainability objectives/Sustainability Appraisal Framework developed and refined through the Scoping process, used in the all the Plans SA/SEA since 2018.

Considering alternative options

2.4 The SA/SEA process requires local authorities to consider alternative options and to assess sustainability implications of these. As the Plan preparation process, the SA/SEA scoping and submission reports have already examined alternatives.

- 2.5 In light of the need to prepare Main Modifications and to consider, proposed alternatives to these relate to the existing text or policy, in the submission Plan. In this respect, it is important to note that where the proposed Main Modification related to amendments or insertions to text of policies, the appraisal focused on the outcomes in terms of the proposed main modification itself, not the original policy or text, which would have already been subject to sustainability appraisal through earlier stages.

3 Proposed Main Modifications

- 3.1 The council has finalised its schedule of Main Modifications subsequent to the Inspector's preliminary questions. These modifications address issues raised by the Inspector together with further changes proposed by the council. The proposed Main Modifications set out in full in Appendix X. The summary below takes account of the initial assessment of sustainability implications and signposts which modifications require further sustainability appraisal because of this initial assessment.

Cumulative and synergistic effects

- 3.2 An assessment of the cumulative and synergistic effects is required to ensure the Main Modifications are examined in, the wider context of their 'in- combination' effect on the sustainability objectives. It is also important to consider the additional modifications in light of existing planning strategies, plan and policies that remain unchanged.
- 3.3 There are no significant cumulative or synergistic effects and importantly; it is not believed that, the cumulative and synergistic effects of the proposed main modification a) require further action, or b) identification of additional mitigation measures.

4 Sustainability Appraisal Assessment results

- 4.1 This section of the report summarised the outcomes of the appraisal of those Main Modifications that were identified as requiring further assessment. The initial assessment determined which of the proposed main modifications were likely to have sustainability impacts and required further assessment. Following the assessment it is apparent there are no sustainability implications and 'no likely effects' either to individual policy or the whole Plan.

5 Monitoring

- 5.1 The supplementary SA/SEA report is developed taking into account other local, regional, national and European plans and guidance. The SEA Directive requires that: “*Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*” (Article 10.1).”
- 5.2 .Government guidance on SA for development plans states that SA Reports ‘*shall include a description of the measures envisaged concerning monitoring and those proposals*’. Therefore monitoring should be considered at an early in the SA process, included in the SA Report. Furthermore, reviewed in the light, of any responses to consultation.
- 5.3 Therefore, the council needs to ensure that monitoring is appropriate for Plan, monitoring is up-to-date, reliable, and sources are referenced. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken. It is worth bearing in mind that it may be difficult to implement monitoring mechanisms for unexpected effects. The council will monitor the Plan and will publish the results of in the AMR. Contingencies procedures have been developed to identify and address poor performance against objectives or unforeseen adverse impacts of the local plan

6 Conclusion

- 6.1 The proposed Main Modifications do not change the direction of the Plan in terms of the strategic objectives and the vision of the Plan. All the Main Modifications proposed are in conformity with the National Planning Policy Framework (2021) and the London Plan (2021).

Main Modification

- 6.2 The assessment of the proposed Main Modifications has resulted in mainly positive effects on the sustainability objectives and no further amendments or mitigation measures are proposed. The assessment has also demonstrated that there are no significant cumulative negative impacts of the modifications, nor is there any impact on the internationally designated areas as defined by Habitats Regulations Assessment. It is therefore, considered that the proposed Main Modifications are the most appropriate alternative option and therefore appropriate be taken forward.

Appendix A: Proposed Main Modifications dated March 2022 (figure 7).

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM1.1	14	1 st sentence below sub heading: Identifying Merton's Growth areas	A considerable proportion of Merton's growth up to 2036/37 and beyond is, expected to be, delivered in the Opportunity Area (OA). The OA is, designated in the London Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton's OA.	To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year plan period to be 2022/23 - 2036/37.	March 2022 – response to Inspectors' preliminary matters
MM1.1	32	Spatial vision, 1 st sentence	By 2036/37 Merton will:	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM1.1	37	2.1.11	<p>Current housing projections for Merton indicate that <u>a minimum of 11,374 additional homes will be built during the plan period around 29,000 new dwellings could be built in Merton between 2021 and 2050</u>. Policy must therefore ensure that new development in Merton does not create a legacy of poor performance that will require remedial action in the future and add to Merton's retrofit burden. In their Climate Emergency Design Guide (2020), the London Energy Transformation Initiative (LETI) concluded that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025.</p> <p>Footnote 2 - <u>Refer to Policy H11.2. Based on sites identified to be delivered during the 15 year plan period and an assumed delivery of the Intend to Publish London Plan 2021 target for Merton of 918 new dwellings per year for the remaining 15 years to 2050. See Housing policies for further details.</u></p>	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM1.1	373	Places & Spaces in a Growing Borough,	The need to deliver more than 10,000 homes in Merton by 2036/37 does not outweigh the need for developments to be design-led. The Council will require all development to be of the highest design quality and contribute to the Merton's	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters

		Introduction, 2 nd paragraph	long-term economic prosperity, quality of life and a net zero carbon future.		
MM2.1	35	2.1.1	In accordance with Paragraph 149 of the NPPF 2019 and Paragraph 1523 of the Draft NPPF 2021, 'Plans should take a proactive approach to ...	To improve accuracy and demonstrate the soundness of the Local Plan with regards to the latest NPPF published July 2021. Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors' Preliminary Letter March 2022	March 2022 – response to Inspectors' preliminary matters
MM2.2	42	Policy CC2.2 Minimising Greenhouse Gas Emissions, part b	To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended.	March 2022 – response to Inspectors' preliminary matters
MM2.2	51	Climate Change CC2.3 Minimising Energy Use, part e	From <u>01 January</u> 2025, to meet the <u>following</u> maximum Energy Use Intensity targets as set out in the relevant guidance.: <ul style="list-style-type: none"> ○ <u>Residential – 35 kWh/m2/yr</u> ○ <u>Offices – 55 kWh/m2/yr</u> ○ <u>Schools – 65 kWh/m2/yr</u> ○ <u>Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr</u> ○ <u>Retail – 55 kWh/m2/yr</u> ○ <u>Leisure – 100 kWh/m2/yr</u> ○ <u>Higher education teaching facilities – 55 kWh/m2/yr</u> ○ <u>Light industrial uses – 110 kWh/m2/yr</u> ○ <u>GP surgery – 55 kWh/m2/yr</u> ○ <u>Hotel – 55 kWh/m2/yr</u> 	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended. Specific Energy Use Intensity targets were added instead based on new evidence commissioned by Greater Cambridge Shared Planning.	March 2022 – response to Inspectors' preliminary matters

MM2.2	56	2.3.22 and new paragraph	<p>Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to future-proof their development and lead the way in decarbonising Merton until EUI targets are required through national regulations or a locally derived methodology. Merton Council will enforce EUI targets from 2025; these targets will be confirmed in relevant guidance closer to the time in order to consider the latest evidence and technologies. In 2021, Etude carried out a feasibility study [25] to inform the Net Zero Carbon Evidence Base for the Greater Cambridge Local Plan [26] which identified the following Energy Use Intensity targets for a range of development types:</p> <ul style="list-style-type: none"> • Residential – 35 kWh/m2/yr • Offices – 55 kWh/m2/yr • Schools – 65 kWh/m2/yr • Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr • Retail – 55 kWh/m2/yr • Leisure – 100 kWh/m2/yr • Higher education teaching facilities – 55 kWh/m2/yr • Light industrial uses – 110 kWh/m2/yr • GP surgery – 55 kWh/m2/yr • Hotel – 55 kWh/m2/yr 	<p>See above -MM2.2 at Page 51 Plan Ref. Policy CC2.3, part e.</p> <p>References also added.</p>	<p>March 2022 – response to Inspectors’ preliminary matters</p>
-------	----	--------------------------	--	--	---

			<p><u>New Paragraph - Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to reduce fuel bills for future occupants and help tackle fuel poverty in Merton, and to future-proof their development and lead the way in decarbonising Merton. These targets, or subsequently adopted targets, will be enforced from January 2025.</u></p> <p><u>[25] Bioregional, Etude, Currie & Brown, “Greater Cambridge Local Plan: Net Zero Carbon Evidence Base. Task D - Technical Feasibility,” May 2021. [Online]. Available: Feasibility study https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/NetZeroTechnicalFeasibility_GCLP_210831.pdf.</u></p> <p><u>[26] Bioregional, Etude, Currie & Brown, Mode, “Greater Cambridge Net Zero Carbon Evidence Base Non-technical summary,” August 2021. [Online]. Available: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Greater%20Cambridge%20Local%20Plan%20Net%20Zero%20Carbon%20Evidence%20Base%20-%20Non%20Technical%20Summary%20FINAL.pdf.</u></p>		
MM2.2	255	Policy N7.1 part d	Support developments in the Local Centre that create a well-designed shopfront in accordance with Merton’s shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters

			and Merton Road to improve their shopfronts and building facades;		
MM2.2	268	Policy N9.1, part h	h. Promoting good placemaking by providing places for people to meet, relax, enjoy events and participate in the town centre. as set out in the public space framework in the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	281	Site Allocation Wi2	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	288	Site Allocation Wi5	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	290	Site Allocation Wi6	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	299	Site Allocation Wi9	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	302	Site Allocation Wi10	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	305	Site Allocation Wi11	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters

MM2.2	311	Site Allocation Wi13	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in-line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	314	Site Allocation Wi15	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in-line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	318	Site Allocation Wi16	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in-line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	334	Policy H11.1, part i	For schemes of 10 homes and above, affordable housing is required to be provided on-site. In exceptional circumstances, where the applicant has robustly demonstrated to the council that on-site provision is not feasible, we may consider a financial contribution equivalent. This justification must include the provision of a detailed financial appraisal. For these schemes, off-site and cash in lieu schemes must accord with the requirements set out in The London Plan and <u>have regard to</u> the Mayor’s Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	346	Policy H11.2, part c	Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 <u>and having regard to</u> Merton’s design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters

MM2.2	374	Policy D12.1, part a	Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and <u>have regard to</u> existing and emerging good practice guidance.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	378	Policy D12.2, part a	Be of the highest standard and <u>have regard adhere</u> to the most appropriate policy guidance and best practice.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	544	Policy P15.10, part b	Several policies in the local plan contribute to reducing and/or mitigating the impacts of air pollution such as transport, green infrastructure, design and climate change polices. Developers must <u>have regard to follow</u> any guidance provided by Merton Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	546	Policy P15.10, part r	Development proposals for leisure, sport and/or play facilities must <u>have regard to follow</u> Sport England’s Artificial Lighting Guidance and London Plan policy S5 Sports and recreation facilities.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	548	Policy P15.10, part bb, i	Its essential construction and demolition sites <u>have regard to follow</u> the Right Waste Right Place guidance and Waste Management Duty of care of practice to ensure construction and demolition waste is, managed correctly to prevent pollution and miss description of waste.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.1	84	3.1.10	In this circumstance, we would not be able to encourage new town centre uses in Colliers Wood as supporting large “out of centre” shops, offices and leisure development is contrary to the NPPF (National Planning Policy Framework) 2019 <u>2021</u> (chapter 7), the London Plan and Merton’s own planning policies.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM3.1	121	Site Allocation Mi1 Benedicts Wharf	Approach to tall buildings: The size of the site allows for a masterplanned approach which could contain taller buildings <u>of up to 10 storeys subject to consideration of design policies.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters

MM3.1	161	Site allocation Mi16 Mitcham Gasworks	Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings <u>of up to 9 storeys</u> subject to consideration of <u>design policies impacts on existing character, heritage and townscape.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters
MM4.1	119	Site Allocation Mi1 Benedict Wharf	Further information: The draft South London Waste Plan <u>2024-2036 2022-2037</u> which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and has been submitted to the Sectary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.	To improve accuracy and ensure soundness, the plan period for the SLWP has been updated, in line with the current EiP process.	March 2022
MM4.1	502	14.3.30	In 2018, the London boroughs of Croydon, Kingston, Merton and Sutton started working on the next version of the South London Waste Plan, making the most of their strong track record and commitment to joint working and helping to deliver the new London Plan’s policies and de-risk the delivery of essential infrastructure for south London. The new South London Waste Plan will address waste management needs during the 15-year period from <u>2024 till 2036 2022 til 3027.</u>	See above MM4.1, page 119.	March 2022
MM3.1	233	Site allocation 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 <u>up to 15 storeys subject to consideration of design policies.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters
MM11.1	333	H11.1	<u>Strategic</u> policy H11.1 Housing Choice	To comply with NPPF para 20(a) - in response to Inspectors’ Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors’ preliminary matters
MM1.1	333	H11.1	(e.) Aim for the strategic target of 50% of new homes built in Merton between 2022/ <u>23</u> -2036/ <u>37</u> to be affordable.	See above - initial MM1.1 at Page 14	March 2022 – response to Inspectors’ preliminary matters
MM11.1	346	H11.2	<u>Strategic</u> policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspectors’ Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors’ preliminary matters

MM1.1	346	H11.2	We will aim to deliver a minimum of 41,732 11,374 additional homes for the period 2022/23 - 2036/37 2024/22-2035/36 .	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors’ preliminary matters
MM1.1	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 41,732 11,374 additional homes for the period 2024/22-2035/36 2022/23 – 2036/37 will come forward in Merton by:	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors’ preliminary matters
MM1.1	347	Supporting new paragraph after 11.2.4	<u>The SHLAA 2017 findings indicates 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 2036/37 increases to 548 homes per annum.</u>	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors’ preliminary matters
MM1.1	348	11.2.5	In accordance with the London Plan requirements and in consultation with and endorsed by the GLA, the housing trajectory set out in Figure 4.2.1 demonstrates how Merton’s housing target will be met for the Local Plan period 2022/23 – 2036/ 37 2024/22 – 2035/36 using a stepped housing delivery target.	See above - initial MM1.1 at Page 14	In response to Inspectors preliminary letter, March 2022
MM1	348	11.2.7 and Figure 4.2.2	As Figure 11.2.2 below indicates Merton’s annual housing target will be set at 775 700 homes per annum for the period 2022/23 2024/22 , increasing to 950 for the period 2025 /26 – 2027/28 2023/24 , and then increase to 4,080 1,555 for 2028/29 the period 2024/25- 2026/27 , then further increase to 1,350 for the period 2027/28 – 2028/29 . <u>This ensures that Merton’s Local Plan housing requirement for the Plan period 2022/23 – 2036/37 including the shortfall of 928 new homes is met.</u>	See above - initial MM1.1 at Page 14 Formerly AM11.8. <i>Moved to Main Modifications in response to Inspectors preliminary matters</i>	March 2022 – response to Inspectors’ preliminary matters

			<table border="1"> <tr> <td></td> <td>2024/ 22</td> <td>2022/ 23</td> <td>2023/ 24</td> <td>2024/ 25</td> <td>2025/ 26</td> <td>2026/ 27</td> <td>20</td> </tr> <tr> <td>Merton Local Plan target</td> <td>775 750</td> <td>775 700</td> <td>775 700</td> <td>1,080 700</td> <td>1,080 950</td> <td>1,080 950</td> <td>1,3</td> </tr> <tr> <td>London Plan target</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,4</td> </tr> </table>		2024/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	20	Merton Local Plan target	775 750	775 700	775 700	1,080 700	1,080 950	1,080 950	1,3	London Plan target	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,4		
	2024/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	20																						
Merton Local Plan target	775 750	775 700	775 700	1,080 700	1,080 950	1,080 950	1,3																						
London Plan target	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,4																						
MM1.1	348	11.2.8	<p>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 <u>and includes the rolling forward of the small sites target beyond 2029</u>. This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to <u>2036/37 2035/36</u> of <u>1,644 1,096</u> as indicated in the following table:</p> <table border="1"> <thead> <tr> <th>Plan period</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>2029/30 - 2033/34</td> <td>2,370</td> </tr> <tr> <td><u>2034/35 – 2036/37 2035/36</u></td> <td><u>1,644 4</u></td> </tr> <tr> <td>2029/30 – <u>2036/37 2035/36</u></td> <td><u>4,014 3</u></td> </tr> <tr> <td>Total</td> <td></td> </tr> </tbody> </table>	Plan period	Target	2029/30 - 2033/34	2,370	<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 4</u>	2029/30 – <u>2036/37 2035/36</u>	<u>4,014 3</u>	Total		See above - initial MM1.1 at Page 14 Formerly AM11.8. <i>Moved to Main Modifications in response to Inspectors preliminary matters</i>	March 2022 – response to Inspectors' preliminary matters														
Plan period	Target																												
2029/30 - 2033/34	2,370																												
<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 4</u>																												
2029/30 – <u>2036/37 2035/36</u>	<u>4,014 3</u>																												
Total																													
MM1.1	349	Figure 4.2.1	Figure 11.2.1 'Merton Housing Trajectory 2022/23 – 2036/37' updated – refer to Appendix 2	See above - initial MM1.1 at Page 14	March 2022 – response to Inspectors' preliminary matters																								

				Formerly AM11.10. Moved to Main Modifications in response to Inspectors preliminary matters	
MM2.2	390	Policy 12.1.g	Conserve and enhance Merton's heritage assets and distinctive character using Merton specific guidance, such as Merton's Borough Character Study and Conservation Area Appraisals.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	396	Policy 12.2.q	Prioritise pedestrians and cyclists and encourage greater walking and cycling for all around the area in accordance with Transport for London (TfL) Healthy Streets Approach.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	400	Supporting text: Additional point added after 12.2.9	<u>12.2.10 Transport for London's (TfL) Healthy Streets Approach provides information and guidance on how best to prioritise walking and cycling.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.1	402	12.5 a(i)	Principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, the London Plan, and Historic England guidance;	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.2	404	Policy 12.3.s	Provide well-designed cycle parking in accordance with London Plan minimum standards and TfL's London Cycle Design Standards that is well integrated with the overall design approach of the development and does not negatively impact on the primary street elevation.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	404	Policy 12.3.u	Ensure that the design and management of facilities for recycling, storage and disposal of household waste is designed to ensure efficient and effective waste collection, is well designed and is considered as in accordance with Merton's Waste and Recycling Storage Requirements and is part of the overall design approach and does not	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters

			adversely affect the primary building function, appearance of the building and character of the street.		
MM2.2	408	Supporting text: Additional point after 12.3.7	12.3.8 TfL's London Cycle Design Standards provides requirements and advice for the design of dedicated cycle infrastructure.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	410	Supporting text: Additional point after 12.3.15	12.3.16 Merton's Waste and Recycling Storage Requirements sets out guidance on the siting and design of waste and recycling facilities so that waste collection services in Merton can efficiently collect and dispose of household and other waste and recycling.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM12.8	419	Policy 12.5.a	Development proposals affecting a heritage asset or its setting will be required to be in accordance with the following criteria: i. principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, and the London Plan, and Historic England guidance; ii. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b (for guidance) and also initial MM2.1 at Page 35 Plan Ref. 2.1.1 (for NPPF)	March 2022 – response to Inspectors' preliminary matters
MM2.2	422	Supporting text: Additional point after 12.5.2	12.5.3 Historic England provides detailed guidance on best practice approaches when working with heritage assets. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study also provide borough specific guidance when working with heritage assets.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters

MM2.2	426	Policy 12.6.1.b	<u>Wimbledon town centre, as set out within the chapter on Wimbledon and the Future Wimbledon supplementary planning document.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.2	427	Policy 12.6.2.k	They are informed by <u>have had regard to</u> the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.1	431	Para 13.1.1	The NPPF 2019 and 2021 draft states that planning policies...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.2	440	Policy 12.9.e	Shop-fronts must be of a high quality and well-proportioned and designed and should be designed in accordance with the council’s Shopfront Supplementary Planning Document 2017.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.2	441	Supporting text 12.9.1	Shop-fronts have a huge impact on the appearance of individual buildings and parades of shops. <u>Merton’s Shopfront SPD provides best practice design approaches for design and should be used when designing shop fronts.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.1	443	13.2.16	...in line with the “Agent of Change” approach in the NPPF 2021 2019 and in the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	443	13.3.2	The NPPF 2021 2019 paragraphs 8, 20 and 81 0 -91 2 , the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	456	13.5.2	The NPPF 2019 (and 2021 consultation draft) makes clear that local authorities should definte define the extent of the Primary Shopping Area and the town centre boundary. These are available on Merton’s Policies Map for each town centre.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters

MM2.1	456	13.5.4	The NPPF 2021 2019 and associated NPPG promotes	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.1	... the NPPF 2021-2019 (paras 86 0-91 0)...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.2	The NPPF 2021 2019 and the London Plan support the “town centres first” approach...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.4	As set out in the NPPF 2019 (and the 2021 draft) the Primary Shopping Area...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.5	In accordance with the National Planning Policy Framework 2019 (NPPF 2021 paragraph 90 , impact assessments will be required	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	471	13.8.1	The NPPF 2021 2019 , the London Plan and Merton’s strategic policies...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	490	14.2.5	Sports and leisure facilities (including Playing Pitches), should be tested against paragraph 97 99 of the NPPF and considered against the requirements of London Plan Policy S5. ...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	First published in Document 0D4b Additional modifications in November 2021 for submission March 2022 – response to Inspectors’ preliminary matters
MM16.1	562	Para 16.1.2	As set out in t The Mayor’s Transport Strategy and the Government’s Decarbonising Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce set out the overarching policy framework and strategic approach to transport which focuses on reducing dependency on cars in favour of active, efficient and sustainable modes of travel.	Additional reference to newly published Decarbonising Strategy and associated wording amendment.	
MM16.2	565	T16.2d	Provide secure, covered and well-designed cycle parking facilities that meet or exceed London Plan standards (higher level minimum requirements) in accordance with London	November 21 Amendment made as proposed by TfL Spatial Planning and to ensure	November 21 Amendment made as proposed by TfL Spatial Planning and to

			Plan minimum standards (higher level) and London Cycle Design Standards.	consistency with London Plan policy T5 A 2 which states that “Developments should provide cycle parking at least in accordance with the minimum standards.”	ensure consistency with London Plan policy T5 A2 March 22. Response to Inspectors preliminary matters
MM2.2	571	T16.4d	Disabled <u>persons</u> ’ parking should be provided in accordance with London Plan standards and should <u>have regard to meet</u> design guidelines, be accommodated within the development site <u>where possible</u> and be provided with electric vehicle charge points.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	
MM16.4	578	16.4.15	<u>For developments that comprise of a mix of dedicated private parking spaces and communal parking, the London Plan requirement for 20% active EV provision should be fully applied to any communal parking facilities. Developers should also refer to Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles (publishing.service.gov.uk) that may also be applicable to the development.</u>	Sentence added to provide clarity in relation to application of the London Plan standard for the provision of EV charge points for mixed developments. This is in response to newly published Government proposals for building regulation to require all new dwellings with dedicated parking space to have a charge point installed. For developments comprising a mix of units with communal parking and houses with private driveways, there is concern that a development could attempt to meet both the building regs requirement and the London Plan 20% standard by allocating charge points first to units with private parking and thus leaving communal parking facilities with no or inadequate EV charging provision.	March 2022

MM18.1	After page 583	After the Appendices title page, insert a new initial appendix	[See appendix 4 to this Schedule of Main Modifications]	To improve clarity regarding which adopted policies are superseded by the Local Plan and to ensure the effectiveness and regulatory compliance of the Local Plan.	March 2022 – response to Inspectors’ preliminary matters
MM19.1	After page 665	Insert new policy M19.1 Monitoring	<i>Refer to Appendix 3 for new policy wording</i>	To improve clarity of the proposed monitoring arrangements that will gauge the effectiveness of the policies and will help to inform the Local Plan review process, and therefore ensure the overall soundness of the Local Plan.	March 2022 – response to Inspectors’ preliminary matters