Schedule of Main Modifications to Merton's Draft Local Plan – 20 May 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 <u>Stage 3 pre-submission draft Local Plan consulted on 22 July to 6 September (Ref. 0D1)</u> 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	A considerable proportion of Merton's growth up to 2036/37 and beyond is, expected	To improve	March 2088
		below sub	to be, delivered in the Opportunity Area (OA). The OA is, designated in the London	accuracy and	response
		heading:	Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The	ensure soundness	to
		Identifying	GLA has agreed that Morden can be included in Merton's OA.	by complying with	Inspectors'
		Merton's		NPPF para. 22, all	preliminary
		Growth areas		references and related information	matters
				are modified to	
				show the 15-year	
				plan period to be	
				2022/23 - 2036/37.	
MM1.1	32	Spatial	By 2036/37 Merton will:	See above MM1.1	March 2022
		vision, 1 st		at page 14.	response
		sentence		. •	to
					Inspectors'
					preliminary
					matters
MM1.2	32	Spatial	Have protected and improved access to the borough's Metropolitan Open Land	For compliance	May 2022 –
		vision, new	(MOL), parks and open spaces, and have protected and enhanced biodiversity	with national	response to
		bullet point.	and areas of nature conservation.	policy and to reflect the	Inspectors'
			and areas of flatare someof varion.	environmental	questions.
				Strategic	
				Objectives set out	
				on page 29.	
MM2.1	35	2.1.1	In accordance with Paragraph 149 of the NPPF 2019 and Paragraph 1523 of the	To improve	March 2022
			Draft NPPF 2021, 'Plans should take a proactive approach to	accuracy and	response
				demonstrate the	to
				soundness of the	Inspectors'
				Local Plan with	preliminary
				regards to the	matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				latest NPPF published July 2021.	
MM1.1	37	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. 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.	Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors' Preliminary Letter March 2022 See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM2.1a	42	Policy CC2.2	Minimising Greenhouse Gas Emissions	Modified to clarify	May 2022 –
		Minimising Greenhouse Gas Emissions	We will require all proposed All development within the borough should seek to demonstrate that the fullest contribution to minimiseing greenhouse gas emissions has been made on site. This will be achieved by requiring:	and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	response to the Inspector's MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			All development: We will require: All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:		
			 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 (AM2.5): 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:		
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
MM2.2a	43	Footnote 3	This represents a minimum improvement beyond Part L of Building Regulations 2013. When Building Regulations are updated we will seek to apply publish an equivalent standard against the new Building Regulations.	To improve clarity in response to the Inspector's Matters	May 2022 – response to the

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			·	Issues and	Inspector's
				Questions.	MIQs
MM2.1a	44	2.2.1	In line with the London Plan, all developments in Merton shouldare required to	To clarify and	May 2022 –
			maximise on-site carbon savings in accordance with the Mayor of London's energy	improve the	response to
			hierarchy through energy efficiency, the use of clean energy, and on-site renewable	effectiveness of	the
			energy generation.	the policy, in	Inspector's
				response to the	MIQs
				Inspector's Matters	
				Issues and Questions.	
MM2.2a	46	2.2.8	This net-zero carbon target will may need to be reviewed as and whenif national and	To improve clarity	May 2022 –
IVIIVIZ.Za	40	2.2.0	regional policy changes (e.g. updates to Building Regulations expected in 2023 and	in response to the	response to
			2025 and any updates to the London Plan), and as part of the Local Plan review in 5	Inspector's Matters	
			years. if the Mayor were to adopt a change in approach to include both regulated and	Issues and	Inspector's
			unregulated emissions within their net-zero carbon target, to address the shortfalls	Questions.	MIQs
			highlighted above). If this were to result in a substantial change, this would be		
			considered as part of the local plan review process.	This major	
				modification	
				supersedes	
				additional	
				modification	
MM2.2b	48	2.2.17		AM2.5a. To improve clarity	May 2022 -
IVIIVIZ.ZD	40	2.2.17	In order to incentivise developers to implement lower carbon strategies on site where	in response to the	response to
			possible, and to ensure that any remaining carbon shortfall can adequately be	Inspector's MIQs.	the
			addressed off site, the carbon shortfall for the assumed life of a development (e.g. 30	mapeotor a miga.	Inspector's
			years) will therefore be offset at a rate of £300/t as at 2021. The price for offsetting		MIQs
			carbon is regularly reviewed; this will be monitored and, if necessary, updated. Any		
			changes to Merton's suggested carbon offset price will be updated in future		
14140		0	guidance.		14 1 2222
MM2.2	51	Climate	From <u>01 January</u> 2025, to meet the <u>following</u> maximum Energy Use Intensity targets	To ensure that the	March 2022
		Change CC2.3	as set out in the relevant guidance.:	policy is justified and legally sound,	– response
		Minimising		and legally sound,	to Inspectors'
		Energy Use,		requirements to	preliminary
		part e		conform to	matters
				guidance have	11.5.1.5.15
				been removed or	
				amended.	

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		 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 	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	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: Pesidential – 35 kWh/m2/yr Schools – 65 kWh/m2/yr Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr Eeisure – 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	See above MM2.2 at Page 51 Plan Ref. Policy CC2.3, part e. New references also added to the Bibliography on page 73 of the Local Plan and to the Examination Library to support these new targets. (Please note, the addition of these new references within the Climate Change Chapter Bibliography will have changed the numbering of subsequent references)	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			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. [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-		
MMO	04	Dallay CC2 5	08/NetZeroTechnicalFeasibility GCLP 210831.pdf. [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%20Evid ence%20Base%20-%20Non%20Technical%20Summary%20FINAL.pdf.	Madified to alonify	May 2002
MM2.3	64	Policy CC2.5 (a-d)	Merton Council will require all All development proposals to should adopt a circular economy approach to building design and construction, and be designed for durability, flexibility and easy disassembly, 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:	Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	May 2022 – in response to the Inspector's Matters, Issues & Questions.
			All development:		
			To prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			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. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.		
			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.		
MM2.4	64	Policy CC2.5 (e)	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 actions taken to reduce life-cycle carbon emissions.	Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	May 2022 – in response to the Inspector's Matters, Issues & Questions.
MM3.1	81	Colliers Wood: Policy N3.1, New part after f	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.	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.	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
	J		·	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.	
				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	
				relevant Strategic	
				Heights Diagrams	
				and the policy	
				D12.6.	
				These changes	
				have been	
				developed in	
				consultation GLA	
				officers, following	
				the Mayor of	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			·	London's Stage 3	
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 (chapter 7), the London Plan and Merton's own planning policies.	response. See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM3.2	93	Site Allocation CW2, Approach to tall buildings	A mixed-use redevelopment within the site could include taller(AM1.9) 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. The Strategic Heights Diagram for the Colliers Wood Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be 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'	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022 – response to Inspectors' Stage 1 matters INSP03
MM3.3	102	Site Allocation CW5, Design and accessibility guidance	Opportunity to improve connectivity across Colliers Wood and improve the condition of the Pickle Ditch. Development proposals must protect and enhance the Wandle Valley Metropolitan Open Land (MOL) along the western boundary of the site, in accordance with the Green Infrastructure policies set out in Chapter 15.	For clarity and accuracy and to maintain consistency with London Plan and National Policy.	May 2022 – response to Inspectors' MIQ.
MM3.4	104	Site Allocation CW5, Impacts a designated open space	Yes, the western edge Parts of the site to the south are is Metropolitan Open Land (MOL) and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer.	For clarity and accuracy.	May 2022 – response to Inspectors' MIQ.
MM4.1	119	Site Allocation Mi1 Benedict Wharf	Further information: 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 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	March 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			·	current EiP	
				process.	
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(AM1.9) buildings of up to 10 storeys subject to consideration of design policies.	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
MM4.2	146	Site Allocation Mi11 Raleigh Gardens car park, Approach to tall buildings	Approach to tall buildings: Development of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.	Site allocation removed from a site appropriate for tall buildings at Stage 3 (Reg 19). This text remained by accident.	May 2022 – response to Inspectors' Stage 1 matters INSP03
MM4.3	159, 161	Site Allocation Mi16 Mitcham Gasworks Western Road, Indicative site capacity (p 159), Approach to tall buildings (p161)	Indicative site capacity: 200-400Around 650 new homes Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to 10 storeys subject to consideration of design policies, along with a replacement telecoms mast on top of the tallest building. impacts on existing character, heritage and townscape.	Updated to ensure that the Plan is justified and effective. reflects the latest information as agreed in the Statement of Common Ground with the landowners and	May 2022 - response to the Inspect ors' Matters Issues and Questions
MM5.1	173	Morden: Policy N5.1, KEY OBJECTIVE S: MORDEN	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.	To improve clarity and accuracy of where the majority of new homes will be delivered.	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			, , , , , , , , , , , , , , , , , , , ,	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.	
				۸ م الم مامام الم	
				As the details of a	
				possible future	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
Wida Ital.	l ago	r idir rtor.	1 Toposod Officingoo	Opportunity Area	Bato made
				Planning	
				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:	Delete map	See above - initial	November
		Policy N5.1	, ,	MM5.1 at Page	2021 – for
		map		173	submission
MM5.1	176	Morden:	This will be achieved through the delivery of a co-ordinated, well-designed series of	See above - initial	November
		Policy N5.1	changes to the Wider Morden Town Centre Area which includes include	MM5.1 at Page	2021 – for
		text	intensification and	173	submission
MM5.1a	177	Morden:	Development pPproposals for large sites (0.25 hectares and above) that assist	Improve clarity that	May 2022
		Policy N5.1	contribute to the delivery of comprehensive regeneration as described in this policy	incremental	
		part a	and Site Allocation Mo41(AM5.10), will be supported.	development	
				proposals on large	
				sites (0.25ha and	
				above) can	
				contribute to the	
				delivery of	
				comprehensive	
				regeneration and	
				to ensure that the	
				Plan is positively	
				prepared and	
		ļ., .		justified.	
MM5.1	177	Morden:	Incorporating a range of appropriate public spaces and streets within the Morden	See above - initial	November
		Policy N5.1	Regeneration Zone that enhance accessibility through the Wider Morden Town	MM5.1 at Page	2021 – for
		part c	Centre Area to the surrounding area, with pedestrians and cyclists as the priority.	173	submission
MM5.1	177	Morden:	Incorporating green infrastructure that contributes to improved drainage, air quality	See above - initial	November
		Policy N5.1	and the creation of green links through the Morden Regeneration Zone and the	MM5.1 at Page	2021 – for
		part d	Wider Morden Town Centre Area, connecting to	173	submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
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: - 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	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	178	Morden: Policy N5.1 part i	Ensureing 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 sustainable and active travel choices(AM5.12a).	See above - initial MM5.1 at Page 173	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
Mod Ref. MM3.1	Page 178	Plan Ref. Policy N5.1	Contact Co data & Chem regulate [and discloses rights] (2013) (of (1980))200) Morden Regeneration Zone heights range up to 5 38m pages up to 7 1m pages up to 2 28m pages up to 5 28m pages u	Reason See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	Date made November 2021 – for submission
			merton		
			Insert the diagram after the last policy bullet point		
MM5.1a	180	New paragraph below 5.1.11	The vision, objectives and principles set out in the SDF should be used to inform development proposals for large sites (0.25 hectares and above) that come forward to contribute to the delivery of comprehensive regeneration, as stated in Policy N5.1 part a., above.	See above - initial MM5.1a at Page 177	May 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM5.1	181	5.1.12	The Wider Morden Town Centre AreaMorden town centre is within an Opportunity Area as designated in the London Plan 2021produce an Opportunity Area Planning Framework which will include the significant contribution that the Wider Morden Town Centre AreaMorden Regeneration Zone will make towards the Opportunity Area's target to accommodate 5000 new homes and 6000 new jobs.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1b	182	5.1.18	There are also multiple other land ownership interests within the Morden Regeneration Zone and landowners are strongly encouraged to work together. and a IL and assembly strategy will be required to ensure that the comprehensive regeneration of Site allocation Mo1 can be achieved by the end of this local plan period and site can be developed in a comprehensive manner, (AM5.16a) to avoid fragmented development and suboptimal densities in this highly accessible location	Changes informed by discussions with landowners and proposed to ensure that the plan is positively prepared.	May 2022
MM5.1a	182	5.1.18	References to comprehensive regeneration in this policy refer to the nature and scale of the regeneration and not a delivery method (AM5.7) and, in accordance with London Plan policies H1 and H2, references to large sites in this policy refer to sites of 0.25 hectares and above.	See above - initial MM5.1a at Page 177	May 2022
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 Morden Town Centre, 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 and tall buildings (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 D512.6(AM5.27), are considered appropriate as part of the regeneration to deliver optimised residential development onand intensified use of (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	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	See above –Initial MM3.1 at Page 81	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>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	Plan Ref. Policy N3	
MM5.1	185	5.1.34	The scale of existing buildings with in (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 There 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
MM5.1a	190	New paragraph below 5.1.63	There are large sites that could come forward with development proposals during the lifetime of this Local Plan that can help to achieve the comprehensive regeneration of Site Mo1. Unlike smaller sites, large sites (of 0.25 hectares or more) are of a size that can optimise capacity for Town Centre Type Uses, new homes, and support improvements to the public realm and local infrastructure in line with the requirements in this policy.	See above - initial MM5.1a at Page 177	May 2022
MM5.1c	199	Site allocation Mo3, Infrastructure Requirement s	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. In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wandle Valley MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.	For clarity and consistency with national policy.	May 2022 - in response to the Inspectors' MIQs.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM5.2	202	Site Allocation Mo4, Site deliverability	Commencement within 5 years and delivery in phases within 105-15 years.	To improve clarity and consistency with other site allocations and to ensure that the site allocation is 'justified'.	November 2021 – for submission
MM5.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 4	A range of appropriate public spaces and streets within the Morden Regeneration Zone(AM5.6) that enhance accessibility through the Wider Morden Town Centre Areato the surrounding area, 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 Morden Regeneration Zone,	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 and in accordance with the Strategic Heights Diagram for the Morden Regeneration Zone(MM5.2) 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 in the Wider Morden Town Centre Areawithin its proximity, including the following site allocations:	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1a	202	Site Allocation Mo4, Design and accessibility guidance:	Development proposals for large sites (0.25 hectares and above) such as 34-44 London Road, that contribute to the delivery of comprehensive regeneration, could be brought forward before the end of this local plan period.	See above - initial MM5.1a at Page 177	May 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		new paragraph below the first paragraph			
MM3.1	202	Site Allocation Mo4, Design and accessibility guidance: text	In accordance with the Strategic Heights Diagram for the Morden Regeneration Zone a plan-led approach, taller(AM1.9) 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	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' part of a plan-led approach, which could take the form of a masterplan, supplementary planning document or an outline planning application.	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(AM1.9) buildings up to 15 storeys subject to consideration of design policies.	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
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 42.	March 2022 – response to Inspectors' preliminary matters
MM3.1	267	Wimbledon: Policy N9.1, new part between (d) and (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	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission

Mod Ref	Page	Plan Ref	Proposed Changes	Reason	Date made
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason In March 2022 reference to the FutureWimbledon SPD was removed from this modification to address the Inspectors' Preliminary	Date made 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.	Questions letter paragraphs 37-40 See above MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary
MM9.1	268	Wimbledon: Policy N9.1, part j.	Securing improvements to public transport and (AM9.2) investment in Wimbledon station to improve the passenger experience and reduce severance with new bridges ever 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.	Main modification to make the plan effective and 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.	matters November 2021 – for submission
MM9.2	268	Wimbledon Policy N9.1, new part after j	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.	For consistency with national policy and clarity.	November 2021 – for submission
MM9.2a	277	Site Allocation Wi1	Indicative site capacity (new homes): 50 – 70-1035 new homes	Effectiveness	May 2022- response to the inspectors' questions

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM9.3	281	Site Allocation Wi2	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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high	For further clarity on building heights and general conformity with the London Plan Policy.	March 2022 – response to Inspectors' preliminary matters May 2022
			quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.		
MM9.4	283 and 284	Site allocation Wi3	Move the following existing paragraph from "site description" on page 283 to "design and accessibility guidance" on page 284: 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.	To make the plan effective and in recognition of the Statement of Common Ground between LB Merton and LB Wandsworth, January 2022	May 2022 – response to the Inspectors' questions
MM9.5	284	Site allocation Wi3	Design and Accessibility guidance: 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. Impacts listed buildings or undesignated heritage assets 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"	Consistency with national policy and with Grade II* reference already included in Wi3 site description on page 283	May 2022 – response to the Inspectors' questions
MM9.5a	284	Site allocation Wi3, new paragraph under Infrastructure requirements	In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wimbledon Park MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.	For clarity and consistency with national policy.	May 2022 – response to the Inspectors' MIQ.

Mod Ref.	. Page	Plan Ref.	Proposed Changes	Reason	Date made
MM9.3	288	Site Allocation Wi5	Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be subject to consideration of impacts on existing	See above MM9.3 at page 281	March 2022 – response to Inspectors' preliminary matters May 2022
			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' and have regard to the Future Wimbledon SPD.		
MM9.3	290	Site Allocation Wi6	Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.	See above MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters
			However, all building heights will be 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' and have regard to the Future Wimbledon SPD.		May 2022
MM9.3	299	Site Allocation Wi9	Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be 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	See above MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022
MM9.3	302	Site Allocation Wi10	'Tall buildings' and have regard to the Future Wimbledon SPD. Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.	See above MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			However, all building heights will be 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' and have regard to the Future Wimbledon SPD.		May 2022
MM9.3	305	Site Allocation Wi11	Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be subject to consideration of impacts on existing	See above MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022
			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' and have regard to the Future Wimbledon SPD.		
MM9.6	308	Site Allocation Wi12	Approach to tall buildings Development of the site could include taller buildings of up to 10 storeys subject to consideration of impacts on existing character and townscape. subject to consideration of impacts on existing character and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments' and D12.6 'Tall buildings'.	For further clarity on building heights and general conformity with the London Plan Policy.	
MM9.3	311	Site Allocation Wi13	Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be 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	See above MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022
MM9.3	314	Site Allocation Wi15	'Tall buildings' and have regard to the Future Wimbledon SPD. Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.	See above MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			However, all building heights will be 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' and have regard to the Future Wimbledon SPD.		May 2022
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
MM9.3	318	Site Allocation Wi16	Approach to tall 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 in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be 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' and have regard to the Future Wimbledon SPD.	See above MM9.3 at page 281.	March 2022 - response to Inspectors' preliminary matters May 2022
MM11.1	333	H11.1	Strategic 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 2022/23-2036/37 to be affordable.	See above - initial MM1.1 at Page 14	March 2022 – response to Inspectors' preliminary matters
MM11.1a	334	Policy H11.1 Housing	Threshold level to be eligible for the Fast-Track Route as set out in the London Plan provided all provision accords with the tenure mix requirements of Strategic Policy H11.1 and is on-site without public subsidy:	To address GLA response and improve clarity.	November 2021 – for submission May 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		choice, part	·	AM11.2. Moved to	
		f.		Main Modifications	
				in response to	
				Inspectors	
				preliminary letter, March 2022	
MM11.2	334	Policy	Threshold (gross)	To comply more	May 2022-
		H11.1 (f)	Affordable housing tenure split	effectively with the	response to
		Table	10 or more homes	PPG on First	Inspectors'
			70% Low-cost rent	Homes and to	Matters,
				improve clarity of	Issues and
			30% Intermediate	the Plan	Questions
			(Including a minimum of 25% First Homes)		
			2-9 homes		
			70% Low-cost rent		
			30% Intermediate		
			(Including a minimum 25% First Homes)		
MM11.3	334	H11.1(f)	Only in exceptional circumstances will the provision of affordable housing off-site or	To be consistent	May 2022-
		Table	financial contribution in lieu of provision on-site be considered by the council, and	with NPPF and in	response to
			this must be justified, and such schemes will be required to provide a detailed	general	Inspectors'
			viability assessment and contribute to the objective of creating mixed and balanced	conformity with	Matters, Issues and
			communities.	the London Plan	Questions
MM2.2	334	Policy H11.1,	For schemes of 10 homes and above, affordable housing is required to be provided	See above MM2.2	March 2022
		part i	on-site. In exceptional circumstances, where the applicant has robustly	at page 42.	response
			demonstrated to the council that on-site provision is not feasible, we may consider a		to
			financial contribution equivalent. This justification must include the provision of a		Inspectors'
			detailed financial appraisal. For these schemes, off-site and cash in lieu schemes		preliminary
			must accord with the requirements set out in The London Plan and have regard to		matters
			the Mayor's Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these		
MM11.4	339	New	For First Homes the affordable home ownership prices will differ from those set out in	To comply more	May 2022-
		paragraph	supporting paragraph 11.1.11 and Figure 4.1.3 as in accordance with government	effectively with	response to
		following	requirements First Homes must be discounted by a minimum of 30% against the	the PPG on First	Inspectors'
		Figure 4.1.3		Homes and to	Matters,

Mod Ref.	Page	Plan Ref. and before paragraph 11.1.12	Proposed Changes market value and after the discount is applied the first sale must be at a price no higher than £420,000 in Greater London.	Reason improve clarity of the Plan	Date made Issues and Questions
MM11.5	339	Paragraph1 1.1.14	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 https://www.gov.uk/guidance/first-homes . These national policies and guidance, in addition to paragraph 64 of the National Planning Policy Framework also set out specific exceptions to the general requirements for First Homes and low-cost home ownership dwellings which we will have regard to as appropriate in the determination of submitted planning applications.	To improve clarity of the Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.6	339	Paragraph 11.1.14	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). On schemes where policy-compliant provision of First Homes does not result in 10% of the overall housing yield of the site being available for affordable home ownership, any shortfall in this respect would need to be made up from the rest of the intermediate contribution before other types of intermediate affordable housing would be considered.	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.7	341	Paragraph1 1.1.19	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, and such schemes will be required to contribute to the objective of creating mixed and balanced communities and meet the requirements set out in the London Plan supporting paragraphs 4.4.9 to 4.4.13 (inclusive).	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.8	342	Paragraph1 1.1.23	In accordance with the NPPF and London Plan Policy H7 (Monitoring of affordable housing) The the information on off-site and cash in lieu delivery is monitored and published annually as part of Merton's annual Infrastructure Funding Statement and Merton's Authority Monitoring Report (AMR).	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.9	345	New paragraph	Securing M4(2) and M4(3) dwellings	To comply with PPG (Housing	May 2022- response to Inspectors'

Mod Ref.	Page	Plan Ref. following paragraph 11.1.38	There may be site specific factors and viability issues which may warrant flexibility in the application of the accessible housing standards M4(2) and M4(3) requirements set out in Policy 11.1(d) for specific developments. The council will have regard to the exceptional circumstances detailed in PPG (Housing for Older and Disabled People); Government Housing: optional technical standards and paragraph 3.7.6 of the London Plan or subsequent updates to these in determining where the application of flexibility is warranted.	Reason for Older and Disabled People) and Housing Optional Technical Standards	Date made Matters, Issues and Questions
MM11.10	345	New paragraph following paragraph 11.1.38	M4(2) and M4(3) dwellings should be secured via planning conditions to allow the Building Control body to check compliance of a development against the optional Building Regulations standards.	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.1	346	H11.2	Strategic policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	May 2022- response to Inspectors' Matters, Issues and Questions
MM1.1	346	H11.2	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.	See above - initial MM1.1 at Page 14 Formerly AM11.4. Moved to Main Modifications in response to Inspectors preliminary letter, March 2022	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	See above MM2.2 at page 42.	March 2022 - response to Inspectors'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.		preliminary matters
MM1.1	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 11,732 11,374 additional homes for the period 2021/22 – 2035/36 2022/23 – 2036/37 will come forward in Merton by:	See above - initial MM1.1 at Page 14 Formerly AM11.4. Moved to Main Modifications in response to Inspectors preliminary letter, March 2022	March 2022 – response to Inspectors' preliminary matters
MM1.1	347	Supporting new paragraph after 11.2.4	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.	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. Moved to Main Modifications in response to Inspectors preliminary letter, March 2022	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 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
MM1.1	348	11.2.7 and Figure 4.2.2	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 – 2028/29the 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. Moved to Main Modifications in response to Inspectors preliminary matters	March 2022 – response to Inspectors' preliminary matters Further corrections submitted 11 March 2022.

Mod Ref.	Page	Plan Ref.					Prop	osed Cl	hanges					Reason	Date made
												Shortfall			
				2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	from 2019/20 and 2020/21	Total		
			Merton Local Plan target	775 750	775 700	775 700	1,080 <u>950</u>	1,080 <u>950</u>	1,080 <u>950</u>	1,350 1,55 <u>5</u>	1,350 <u>1,555</u>		8265 7,360		
			London Plan target	1,033 918	1,033 <u>918</u>	1,033 918	1,033 <u>918</u>	1,033 918	1,033 918	1,033 918	1,033 <u>918</u>	<u>928</u>	8265 6,426		
MM1.1	348	11.2.8	2029/30 includes	to 2035 <u>the rolli</u> eriod 20	5/36 (3,4 ng forw 029/30 t	166 tota <u>ard of t</u> o 2033/	l) is dra he sma '34 of 2	wn fror I <mark>I sites 1</mark> ,370 an	n the 20 target b d for 20	017 SHI eyond 2	LAA find 2029. Th	or the per ings <u>and</u> is sets a t	target	See above - initial MM1.1 at Page 14 Formerly AM11.8. Moved to Main Modifications in response to	March 2022 – response to Inspectors' preliminary matters
				Plan p						arget				Inspectors preliminary matters	
			20	034/35	- 2033/3 - <u>2036/</u> - <u>2036</u>	<u>37</u> 203				2,370 1,644 1 1,014 3					
MM1.1	349	Figure 4.2.1	Figure 1 Appendiz		lerton H	lousing	Traject	ory 202	22/23 –	2036/3	7' update	ed – refer	to		March 2022 – response

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				See above - initial MM1.1 at Page 14 Formerly AM11.10. Moved to Main Modifications in response to Inspectors preliminary matters	to Inspectors' preliminary matters
MM11.11	366	Policy H11.6 e	The suitability of ground conditions, particularly in respect to the potential to flooding. Please also refer to policies contained in Chapter 15 (Green and Blue Infrastructure) including policies F15.7; F15.8 and F15.9.	To improve clarity and soundness of the Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.12	366	Policy H11.6 f	The need or demand for accommodation provision and the available capacity on existing sites in the borough.	To improve clarity of the Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.13	366	Policy H11.6, new criterion	The provision of a high standard of amenity for future occupants of sites particularly in terms of residential amenity, noise and air quality. Please also refer to policies contained in Chapter 12 (Places and Spaces in a Growing Borough) and Chapter 15 (Green and Blue Infrastructure) including policies F15.7 to F15.10.	To improve clarity and soundness of the Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.14	368	New supporting para following existing para 11.6.6	The extent of provision of appropriate on-site facilities will be determined on a site-by-site basis proportionate to the scale of the proposed site to ensure that any extra provision meets their needs and takes account of the size of the site and the needs and demographics of the families resident on them.	To improve clarity and soundness of the Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM1.1	373	Places & Spaces in a Growing	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-	See above MM1.1 at page 14.	March 2022 - response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		Borough, Introduction, 2 nd paragraph	term economic prosperity, quality of life and a net zero carbon future.		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 42.	March 2022 - response to Inspectors' preliminary matters
MM2.2	375	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 MM2.2 at page 42.	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 42.	March 2022 - response to Inspectors' preliminary matters
MM2.2	380	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 MM2.2 at page 42.	March 2022 - response to Inspectors' preliminary matters
MM2.2	383	Supporting text: Additional point added after 12.2.9	Transport for London's (TfL) Healthy Streets Approach provides information and guidance on how best to prioritise walking and cycling.	See above MM2.2 at page 42.	March 2022 - response to Inspectors' preliminary matters
MM2.2	388	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 MM2.2 at page 42.	March 2022 - response to Inspectors'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			i i		preliminary
					matters
MM2.2	388	Policy	Ensure that the design and management of facilities for recycling, storage and	See above MM2.2	March 2022
		12.3.u	disposal of household waste <u>is designed to ensure efficient and effective waste</u> collection, is well designed and is considered as in accordance with Merton's Waste	at page 42.	responseto
			and Recycling Storage Requirements and is part of the overall design approach and		Inspectors'
			does not adversely affect the primary building function, appearance of the building		preliminary
			and character of the street.		matters
MM2.2	391	Supporting	TfL's London Cycle Design Standards provides requirements and advice for the	See above MM2.2	March 2022
		text:	design of dedicated cycle infrastructure.	at page 42.	– response
		Additional point after	acoign or acaicated cycle inmactitation.		to Inspectors'
		12.3.6			preliminary
		12.0.0			matters
MM2.2	393	Supporting	Merton's Waste and Recycling Storage Requirements sets out guidance on the siting	See above MM2.2	March 2022
		text:	and design of waste and recycling facilities so that waste collection services in	at page 42.	response
		Additional	Merton can efficiently collect and dispose of household and other waste and		to
		point after 12.3.15	recycling.		Inspectors' preliminary
		12.3.13			matters
MM2.2	402	Policy D12.5	Development proposals affecting a heritage asset or its setting will be required to be	See above MM2.2	28 March
		Managing	in accordance with the following criteria:	at page 42.	2022
		heritage	i. principles set out in the National Planning Framework 2019 and 2021		
		assets, part a	draft(MM2.1) 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.		
MM2.1	402	12.5 a	Principles set out in the National Planning Framework 2019 and 2021 draft and the	See above - initial	March 2022
			detailed guidance set out in the accompanying Historic Environment Planning	MM2.1 at Page 35	– response
			Practice Guide, the London Plan, and Historic England guidance;	Plan Ref. 2.1.1	to
					Inspectors' preliminary
					matters
MM2.2	404	Supporting	12.5.3 Historic England provides detailed guidance on best practice approaches	See above MM2.2	March 2022
		text:	when working with heritage assets. Merton's published Conservation Area character	at page 42.	response
		Additional	appraisals and management plans and the guidance statements set out in the		to
			Borough Character Study also provide borough specific guidance when working with		Inspectors'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		point after 12.5.2	heritage assets.		preliminary matters
MM3.1	408	Policy D12.6 Tall Buildings, text	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. Tall buildings are only acceptable in the following locations: a. As set out within the Strategic Heights Diagrams for Colliers Wood town centre, Morden Regeneration Zone and Wimbledon town centre.	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)	November 2021 – for submission
			 b. Wimbledon town centre, as set out within the chapter on Wimbledon. c. Morden Regeneration Zone, as set out within the chapter on Morden and site allocation Mo4. d. Colliers Wood, as set out within the chapter on Colliers Wood and within the site allocation CW2. e. Within Merton's adopted Estates Local Plan 2018. f. Where they are identified in the following site allocations: CW2, Mi1, Mi11, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16. The council will generally support tall buildings where: 	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
			The country capper tain canalings more	Re-added after accidental removal from 2 March 2022 draft - 0D4ai	
MM2.2	408	Policy 12.6, part d	They are informed by have had regard to the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.	See above MM2.2 at page 42.	March 2022 - response to Inspectors' preliminary matters
MM3.1	408	Policy 12.6, text	WeThe council(AM12.28) will generally support tall buildings in those locations set out in part 1 of this policy where:	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside	28 March 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				town centres (Mi1;	
				Mi16 and RP3)	
MM3.1	409	Policy D12.6	p. They're within Wimbledon town centre, as set out in	See above –Initial	November
		Tall	the Future Wimbledon supplementary planning document.	MM3.1 at Page 81	2021 – for
		Buildings,	q. They are within Morden, as set out and site allocation Mo4.	Plan Ref. Policy	submission
		part p-r	r. They are within Colliers Wood, as set out within the site allocation CW2.	N3.1 and to add	
				clarity to three site	
				allocations outside	
				town centres (Mi1;	
				Mi16 and RP3)	
				Re-added after	28 March
				accidental removal	
				from 2 March 2022	
				draft - 0D4ai	

Mod Ref. Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1 410	Policy D12.6 Tall Buildings	Diagram to be added at the end of the policy text: Map of appropriate locations for tall buildings (illustrating Policy D12.6 part 1 (a-f) Winshied on York Crooked Billet Crooked Billet	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)	28 March 2022
		merton		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	410	Policy D12.6	Diagram to be added at the end of the policy text:	See above –Initial	November
		Tall Buildings	Strategic Heights Diagram, Colliers Wood town centre	MM3.1 at Page 81	2021 – for
			The state of the s	Plan Ref. Policy N3.1 and to add	submission
				clarity to three site	
			Cavendish Road	allocations outside	
			Colley Wood From Colley Wood	town centres (Mi1;	
			Xe of Calbert Road of the	Mi16 and RP3)	
			of alwood Cardens	Re-added after	28 March
			hmstchurch Clo ³ Countil	accidental removal	
			Croft Road S	from 2 March 2022	
			Oane Road	draft - 0D4ai	
			Col Path NAV		
			The state of the s		
			Windsor A Wiles		
			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]		
			I Tall building cluster Metropolitan Open Land [MOL] heights range: up to 49m		
			[approx. up to 15 storeys] Open space Brittania Point		
			height: S8m [19 storeys] Conservation area Gateway buildings		
			Townscape views into town centre		
			Electricity pylons Registered parks and gardens		
			Site allocations Listed buildings Locally listed buildings		
			South Wimbledon town centre Locally listed buildings		
			1185		

Mod Ref. Page		Proposed Changes	Reason	Date made
MM3.1 410	Policy D12.6 Tall Buildings	Diagram to be added at the end of the policy text: Strategic Heights Diagram, Morden Regeneration Zone	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)	November 2021 – for submission
		Annual Final	Re-added after accidental removal from 2 March 2022 draft - 0D4ai	28 March 2022
		Morden Regeneration Zone heights range: up to 38m [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		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
Mod Ref. MM3.1	Page 410	Plan Ref. Policy D12.6 Tall Buildings	Proposed Changes Diagram to be added at the end of the policy text: Strategic Heights Diagram, Wimbledon town centre Content	Reason See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3	Date made November 2021 – for submission
			Site allocations Metropolitan Open Land [MOL] Open space Open space		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM2.2	417	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 MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM2.2	418	Supporting text 12.9.1	Shop-fronts have a huge impact on the appearance of individual buildings and parades of shops. Merton's Shopfront SPD provides best practice design approaches for design and should be used when designing shop fronts.	See above MM2.2 at page 42.	March 2022 - response to Inspectors' preliminary matters
MM12.1	423	Policy 12.11.j	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. Where basements discharge to the sewer network, they must install suitable positively pumped devices.	To ensure the Local Plan is justified and effective.	May 2022 – response to Inspectors' Stage 1 matters INSP03
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.
MM2.1	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

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM13.0	449	13.3.9	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. In line with the Agent of Change principle set out in the London Plan and the NPPF, the council will not support proposals on scattered employment site where these would curtail the successful operation of non-residential uses. The premises/sites retained for employment uses must:	To improve clarity and effectiveness	May 2022 – response to the Inspectors questions
MM13.1	454	Policy TC 13. 5	All frontages in Merton's town centres and neighbourhood parades. A. Supporting proposals for developments where: Within Wimbledon, Colliers Wood, Mitcham and Morden town centres aB. In addition to (a)A., supporting proposals for developments that: iii. Betting shops (use identified as sui generis), are not compatible with the main retail or social function of the town centres and are not considered appropriate new uses within the primary shopping area. Within Local town centres aC. Supporting proposals: iii. that do not provide betting shops within the primary shopping area.	To improve clarity and effectiveness	May 2022 – response to the Inspectors questions
MM13.1a	455	Policy TC.13.5	Within Neighbourhood parades AD. 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	To improve clarity.	May 2022 – response to the Inspectors questions.
MM2.1	456	1 3 .5.2	The NPPF 2019 (and 2021 consultation draft) makes clear that local authorities should definte define 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'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
					preliminary matters
MM13.2	457	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 within the primary shopping area of Merton's town centres.	To improve clarity and effectiveness	May 2022 – response to the Inspectors questions
MM13.1a	461	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. As set out in the Table 13.5 "Merton's town centres", neighbourhood parades are not designated town centres and as such, large increases in commercial floorspace will be resisted in line with policy Tc13.6	To improve clarity	May 2022 – response to the Inspectors questions
MM13.3	464	Policy TC 13.6, 2nd paragraph	 A. The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment (required over 280sqm net new floorspace) submitted is proportionate to the scale of the development proposed and satisfies the council's requirements. B. Local convenience development outside town centres meets all of the following criteria: C. 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: 	Positively prepared and consistent with national policy. Reference numbers added for clarity.	
MM2.1	465	13.6.1	the NPPF <u>2021-2019</u> (paras <u>86 0-91 0</u>)	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

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
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
MM13.4	465	13.6.5 (first sentence)	Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area of the new proposal exceeds 280sqm.	Clarity and justification	May 2022 – response to Inspectors matters, issues and questions.
MM2.1	465	13.6.5 (second sentence)	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 gross(MM13.5) located outside town centres and not in accordance with the development plan.	NPPF: See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	NPPF: March 2022 – response to Inspectors' preliminary matters.
MM13.5	465	13.6.5 (second sentence)	In accordance with the National Planning Policy Framework 2019 (NPPF 2021 paragraph 90(MM2.1), impact assessments will be required for leisure and office development above 2,500 sqm gross located outside town centres and not in accordance with the development plan.	For consistency with national policy	May 2022 -
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 OD4b Additional modification s in

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made November 2021 for submission March 2022 - response to Inspectors' preliminary matters
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 2022 till 3027.	See above MM4.1, page 119.	March 2022
MM15.0	505	Insert new paragraphs after 15.1.2	There are 9 areas of Metropolitan Open Land (MOL) designated in Merton, which are of great importance to the green character of the borough. Through the green infrastructure reviews undertaken for this Plan, the MOL boundaries have been reviewed and the council does not consider that major changes are needed to accommodate growth. The MOL sites illustrated on the Policies Maps will continue to be protected from inappropriate development in accordance with London Plan Policy G3 and NPPF paragraph 147. Further information is set out in Policy O15.2 Green Infrastructure and Open Space. Some minor boundary amendments have been made to MOL sites on the Policies Map through this Local Plan. These include corrections to mapping irregularities, and inconsistencies, or changes to reflect the built form on site that has come forward through approved planning applications, which no longer protects the spatial or visual openness of the MOL. These minor boundary changes to the Policies Map help to create strong, defensible and permanent boundaries and ensures consistency with the NPPF and London Plan.	For consistency with national policy.	May 2022 – response to Inspectors' matters issues and questions.
MM15.1	511	Policy O15.3 (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. Where development is adjacent to or includes a river, natural banks must be restored with a 10m buffer included.	Agreed with the Environment Agency in Statement of	November 2021 – submission (added as AM15.6)

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Common Ground. Added as AM15.6	
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 <a have.regard.to"="" href="https://new.new.new.new.new.new.new.new.new.new.</td><td>See above MM2.2 at page 42.</td><td>March 2022 – response to Inspectors' preliminary matters</td></tr><tr><td>MM15.2</td><td>544</td><td>Policy
P15.10
Improving Air
Quality and
Minimising
Pollution</td><td>g. Development proposals must consider the impact of air quality. An AQA will be required for proposals introducing new developments in areas already subject to poor air, major developments, developments involving biomass boilers, biomass or gas CHP (including connections to existing networks where the increased capacity is not already covered in an existing AQA), substantial earthworks or demolition and any development that could have a significant impact on air quality, either directly or indirectly. The following will be needed:</td><td>Following review of the policy in light of MIQs – the Council propose making the MM on the ground of Soundness and to provide as to what development will need to do a AQAs.</td><td>May 2022 –
Matters and
Issues
Question
(MIQs) from
the Planning
Inspector</td></tr><tr><td>MM15.3</td><td>545</td><td>Policy
P15.10
Improving Air
Quality and
Minimising
Pollution</td><td>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. In determining the contribution, the Council will refer to the London Plan Air Quality Neutral quidance (section 5).</td><td>Following review of
the policy in light of
MIQs – the council
propose making
the MM on the
ground of
Soundness and
clarity.</td><td>May 2022 –
Matters and
Issues
Question
(MIQs) from
the Planning
Inspector</td></tr><tr><td>MM2.2</td><td>546</td><td>Policy
P15.10, part r</td><td>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 42.	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 42.	March 2022 - response to Inspectors'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
					preliminary matters
MM15.4	549	Policy P15.10 Improving Air Quality and Minimising Pollution, New para before 15.10.1	The Council will apply London Plan policy SI1 Improving air quality to all development proposals in the borough, along with associated Mayoral guidance on Air Quality Neutral and Air Quality Positive standards and on ways to reduce construction and demolition impacts.	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	
MM15.5	549	Policy P15.10 Improving Air Quality and Minimising Pollution, New para before 15.10.5	The aim of an AQA is to find any significant impact on local air quality and/or disamenity 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.	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM15.6	549	Policy P15.10 Improving Air Quality and Minimising Pollution	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. The process and calculation for this are set out in Section 5.2 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD).	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness and clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM15.7	549	Policy P15.10 Improving Air Quality and	The whole of Merton is designated an Air Quality Management Area (AQMA) and has three Air Quality Focus Zones in the borough. The main sources of particulate matter are road transport (50.4%), re- suspended dust from roads and surfaces	Following review of the policy in light of MIQs –	May 2022 – Matters and Issues Question

Mod Ref.	Page	Plan Ref. Minimising Pollution, New paras after 15.10.2	Proposed Changes (19.9%) and static non-road mobile machinery (10.3%). In respect of the transport sources apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NOx emissions and 80% of the PM10 emissions (based on 2013 modelled data). Merton's air quality priorities are to continue to encourage sustainable travel and sustainable construction; to reduce exposure to air quality and raise awareness; and to work in partnership with residents, community and business groups, Transport for	Reason the council propose making the MM on the ground of Soundness.	Date made (MIQs) from the Planning Inspector
MM15.8	549	Policy P15.10 Improving Air Quality and Minimising Pollution paras 15.10.3 and 15.10.4	London and other organisations to concentrate on local pollution problems in Merton. 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.	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
15.0	550	Policy	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.	Fallowing routing	Mov 2022
15.9	550	Policy P15.10 Improving Air Quality and Minimising Pollution, New para after 15.10.7	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.	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
15.10	550	15.10.9	Air Quality Neutral and Positive 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. The process and calculation for this are set out in Section 5.2 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD).	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM16.1	560	Para 16.1.2	As set out in tThe 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.	May 2022
MM16.2	563	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 Plan minimum standards (higher level) and London Cycle Design Standards.	November 21 Amendment made as proposed by TfL Spatial Planning and to ensure consistency with London Plan policy T5 A 2 which states that "Developments should provide cycle parking at least in accordance with the minimum standards."	November 21 Amendment made as proposed by TfL Spatial Planning and to ensure consistency with London Plan policy T5 A2 March 22. Response

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
					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 MM2.2 at page 42.	May 2022
MM16.3	574	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.	Supporting text amended and updated to include reference to the Government's recently published decarbonising transport strategy.	November 2021 for submission – was previously AM16.23
MM16.4	575	16.4.15	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	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	March 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				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	
141404	Λ (1	A £1 (I	FOr a new and the A to this Oak a data of Main Madification of	charging provision.	M
MM18.1	After	After the	[See appendix 4 to this Schedule of Main Modifications]	To improve clarity	March 2022
	page	Appendices		regarding which	– response
	583	title page,		adopted policies	to
		insert a new initial		are superseded by the Local Plan and	Inspectors'
		appendix		to ensure the	preliminary matters
		appendix		effectiveness and	mallers
				regulatory	
				compliance of the	
				Local Plan.	
MM18.2	641	New glossary	Conversion	To improve clarity	May 2022 -
10110110.2	U - 1	term after	The conversion of existing single dwellings into two or more smaller dwellings.	in response to the	response to
		Convenience	The servereien or existing engle awaiings into two or more emailer awaiings.	Inspector's MIQs.	Inspector's
		Retailing		mopodior o migo.	MIQs.
MM-	Man		Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NLL	This site contains	
	···ap	_			
MM- MOL Ma p-01 a	Мар	Policies Map	Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-3).	This site contains 4 residential properties which	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
	- 5	Metropolitan		do not form part of	
		Open Land		the adjoining	
				cemetery and are	
				physically	
				separated. They	
				do not meet any of	
				the MOL criteria	
				set out in the	
				London Plan and	
				officers consider	
				that their inclusion	
				in the MOL is an	
				anomaly from the	
				previous policy	
				maps and they	
				should be removed	
				to correct this	
				error. The	
				modifications	
				ensure that the	
				Local Plan is	
				'justified'.	
				Refer to maps	
				Appendix 1 for	
				details	
MM-	M ap	Policies Map	Slight boundary amendments around the Eveline Day Nursery SW20 9NA from	Corrections to the	November
MOL Ma		_	Lower Morden Metropolitan Open Land (MOL-3).	MOL boundary	2021 – for
p-0 1 b		Metropolitan		have been made	submission
		Open Land		to fix a GIS	
				cartographic error	
				from the	
				Regulation 19	
				maps where the	
				MOL boundary did	
				not align with the	
				property	
				boundaries. The	
				modifications	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
Mod Roi.	rago	T IGIT TXOT.	Troposed Changes	ensure that the Local Plan is 'justified'.	Bate made
				Refer to maps Appendix 1 for details	
MM- Open Space M a p -02	Мар	Policies Map – Open Space	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).	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'. Refer to map Appendix 1 for details.	November 2021 – for submission
MM- Open Space M ap-0 3	Мар	Policies Map – Ope n Space	Remove part of Tooting and Mitcham Imperial Sports Ground from Open Space (P028), in accordance with approved planning application 19/P4094.	In accordance with approved Planning Application 19/P4094. This is to align with the	November 2021 – for submission

Page	Plan Ref.	Proposed Changes	Reason	Date made
Map	Policies Map - Open Space	Remove part of the Eastfields estate site owned by Clarion Housing Group from Streatham Park Cemetery Open Space (C004).	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'. Refer to map in Appendix 1 for details. In accordance with approved Planning Application 19/P4094. This is to align with the approved planning application	November
			application 17/P1717. This change was highlighted by Clarion Housing Group through their response to the Stage 3 Local Plan consultation. The modifications	
		Map Policies Map – Open	Map Policies Map - Open Remove part of the Eastfields estate site owned by Clarion Housing Group from Streatham Park Cemetery Open Space (C004).	map Policies Map Open Space Remove part of the Eastfields estate site owned by Clarion Housing Group from Space Refer to map in Appendix 1 for details. Remove part of the Eastfields estate site owned by Clarion Housing Group from Space Refer to map in Appendix 1 for details. Reprove Part of the Eastfields estate site owned by Clarion Housing Group from Space Refer to map in Appendix 1 for details. 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 their response to the Stage 3 Local Plan consultation.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
	· a.g			Local Plan is 'justified'.	
				Refer to map Appendix 1 for details.	
MM- Open Space M ap-04	Мар	Policies Map – Open Space	Remove part of the Long Bolstead Recreation Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).	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'. Refer to map Appendix 1 for details.	submission
MM- SINC Ma p-05	Мар	Policies Map – Sites of Importance for Nature Conservation	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.	Reviewed following Stage 3 Local Plan response (D .Dawson) and confirmed by Martin Boyle (LBM Greenspaces team).	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			·	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.	
				This change was	
				identified through a Stage 3 Local Plan	
				consultation	
				response and has	
				been confirmed	
				with the Council's	
				Ecologist.	
				The modifications	
				ensure that the	
				Local Plan is	
				'justified'.	
				Refer to map	
				Appendix 1 for	
				details.	
MM-	Мар	Policies Map	Myrna Close SINC (MeBII10) - The SINC boundary needs to be amended in	In accordance with	
SI N C Ma		Sites of	accordance with approved planning application 16/P3430.	approved Planning	2021 – for
p-06		Importance		Application	submission
		for Nature		16/P3430 to reflect	
		Conservation		the residential	
				properties that	
				have been built	
				and the new	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u> </u>	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'.	
				Refer to map	
				Appendix 1	
				for details.	
MM-	Мар	Policies Map	Ridge Road to Wimbledon Park Green Corridor (GC19) - The Green Corridor	In discussions with	November
Green	IVIAP	- Green	boundary needs to be amended to remove part of the Thames Water site at	Thames Water	2021 – for
Corridor		Corridor	Byegrove Road, Colliers Wood.	officers agree that	submission
Map-07		Comac.		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'.	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Refer to map	
				Appendix 1 for	
				details.	
MM-	Мар	Policies Map	Removed the map showing Archaeological Priority Zones from the Policies Map.	For accuracy and	November
APZs-		_		to ensure that the	2021 – for
Map-08		Archaeologic		Local Plan is	submission
		al Priority		'justified', this data	
		Zones		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.	
MM-	Мар	Policies Map	Added labels to the map showing the Conservation Area codes and also a table	For clarity and to	November
Conserv			below the legend with the name of each of the Conservation Areas	ensure the Local	2021 – for
ation		Conservation		Plan is "justified",	submission
Areas-		Areas		the Conservation	
Map-09				Areas map has	
				been labelled.	
				Refer to map	
				Appendix 1 for	
				details.	
MM-	Мар	Policies Map	Updated to provide the latest information.	For accuracy this	November
Listed		Listad		map has been	2021 – for
Buildings		Listed		updated with the latest information	submission
-Map-10		Buildings		from Historic	
				England. This	
				modification	
				ensures that the	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Local Plan is "justified"	
MM- Locally Listed Buildings -Map-11	Мар	Policies Map Locally Listed Buildings	Updated to provide the latest information.	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	November 2021 – for submission
				Appendix 1 for details.	
MM- Wandle Cycle Route- Map-12	Мар	Policies Map Wandle Cycle Route	New map to highlight the cycle routes that are part of the Wandle Trail	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. Refer to map Appendix 1 for details.	November 2021 – for submission
MM- Merton-	Мар	Policies Map	Cycle network routes have been updated to show the Wandle Missing Link	For accuracy and to ensure that the	November 2021 – for
Cycle		New map		Local Plan is	submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
Network- Map13	T age	T IdiT NOT.	Troposed Changes	'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.	
MM19.1	After page 665	Insert new policy M19.1 Monitoring	Refer to Appendix 3 for new policy wording	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
				Modified to improve clarity on the monitoring requirements for Merton's Climate Change policies in response to the Inspector's Matters, Issues & Questions.	May 2022 – response to Inspector's Matters, Issues & Questions.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made

Appendix 1 – November 2021 for submission







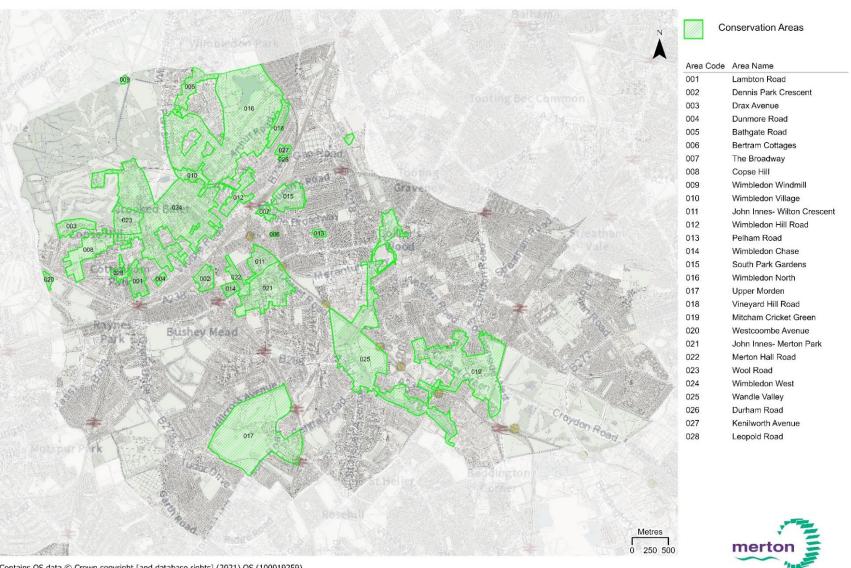




MM-SINC-Map-05 SINCs Stage 3 SINCs Submission merton Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)

MM-SINC-Map-06 SINCs Stage 3 SINCs Submission Christ Church vimbourne Court 15.0m . Fortescue Water Works Greenlea Park Tandem Centre Metres 0 10 20 merton Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)





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MM-Listed	Buildings-Map-10



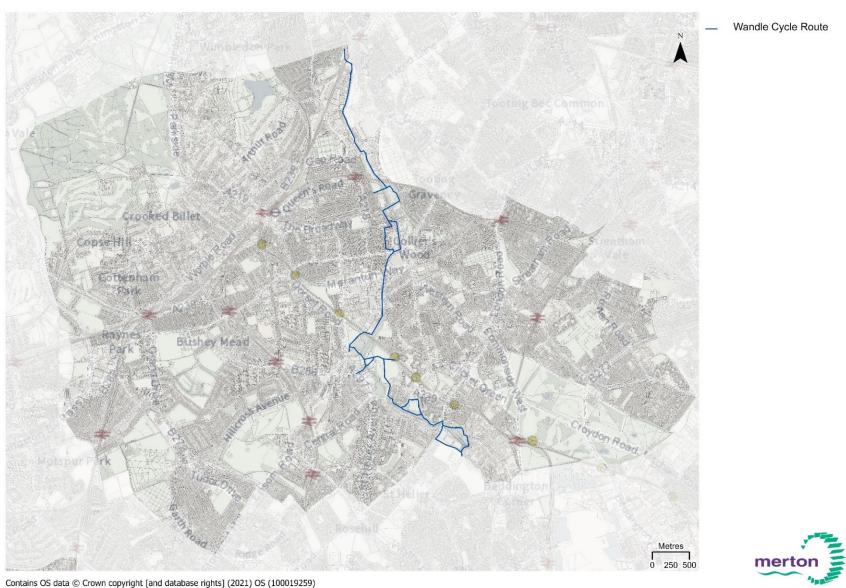


MM-Locally Listed Buildings-Map-11	

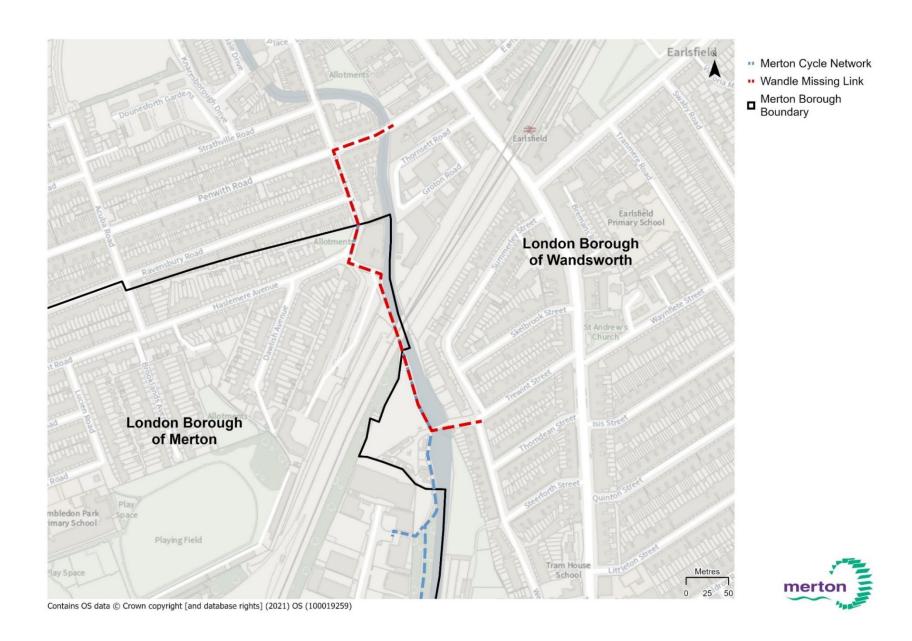




MM-Wandle Cycle Route- Map-12			

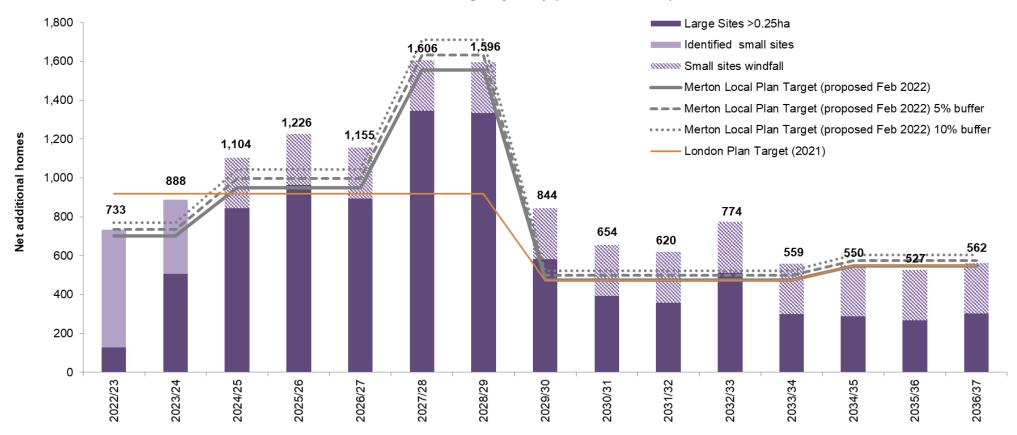


MM-Merton-Cycle Network-Map13



Appendix 2 – page 349 (MM1.1)- Figure 11.2.1 Merton's Housing Trajectory for the Plan period 2022/23 to 2036/37

Merton Housing Trajectory (28th March 2022) 2022/23 - 2036/37



Appendix 3 – after page 665 (MM19.1) new Policy

19. <u>MONITORING</u>

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.
- 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.
- 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 <u>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.</u>

Local Plan Monitoring Framework

Thematic area	Monitoring indicator	Target (if applicable)
Growth Area (Opportunity Area)	London Plan indicative target (up to 2041) to	Cumulative housing completions since OA
	deliver 5,000 new homes and 6,000 jobs	designation.
	(indicative figure).	
		Cumulative non-residential floorspace
		approvals and completions since OA
		designation.
Air quality	Number of days p.a. when air pollution is	Decreasing number of days of high PM10
	moderate or high for PM10*	over a 3-year period.
To reduce emissions and concentrations of		
harmful atmospheric pollutants, particularly in		

Thematic area	Monitoring indicator	Target (if applicable)
areas of poorest air quality and reduce	*Daily mean particles (PM10) not to exceed 50	
exposure.	micrograms per cubic metre - more than 35	
	times a year at any measuring site.	
<u>Biodiversity</u>	Changes in areas of biodiversity importance.	No net loss of sites of importance for nature
		conservation (SINCS).
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).		
Land and soil condition and pollutants	Planning permissions granted contrary to	NO PLANNING PERMISSIONS GRANTED CONTRARY TO ENVIRONMENT AGENCY ADVICE ON FLOOD RISK
	Environment Agency advice on flooding and	AND WATER QUALITY GROUNDS.
To conserve Merton's geodiversity and protect	water quality grounds.	
soils from development and over intensive		
use.		
Sustainable land use	Planning permissions granted and completed.	95% of major planning permissions started
		within a 3 year period.
To make the best and most efficient use of		
land to support sustainable patterns and forms		
of development.		
Houstone (in chading a public at and and	Ni wakan af kasitana agasta an Historia	A neglication in the property of bouits are seen
Heritage (including architectural and	Number of heritage assets on Historic	A reduction in the number of heritage assets
archaeological heritage)	England's Heritage at Risk Register.	on the Heritage at Risk register.
To consorve and enhance the existing historia		
To conserve and enhance the existing historic and built environment, including sites,		
features, landscapes and areas of historical,		

Thematic area	Monitoring indicator	Target (if applicable)
architectural, archaeological and cultural,		
through high quality design and protection of		
open space, valued views and historic assets.		
Flood risk management	Number of planning permissions granted	No planning permissions granted contrary to
	contrary to Environment Agency advice.	Environment Agency advice.
To manage the risk of flooding from all		
sources and improve the resilience of people	Number and location of Environment Agency	
and property to flooding.	flood warnings issued across Merton each	
	<u>year.</u>	
Climate change – operational carbon savings	Average percentage improvement in	Carbon reduction targets set out in policy
	operational carbon emissions against Part L of	<u>CC2.2.</u>
To help tackle climate change through	the Building Regulations.	
reducing greenhouse gas emissions and	Marketta da anta da Barda della Barda	
moving towards a zero carbon Merton by	Monitoring changes to Part L of the Building	Manifesian and undefine the Legal Diagram
<u>2050.</u>	Regulations and the London Plan in case	Monitoring and updating the Local Plan as
	these result in changes to Merton's policies and targets.	required.
	and largets.	
Carbon offsetting	Carbon offsetting proposed where on site	Reporting on carbon offsetting in
Carbon onsetting	reduction is not achievable.	Infrastructure Funding Statement.
To offset any carbon shortfall from	Toddollori is flot dollievable.	minastructure i unumy otatement.
development where zero carbon cannot be	Monitoring changes to the carbon offset price.	
achieved on site.	incling thanges to the carbon offset price.	Monitoring and updating the Local Plan as
define ved off orter.		required.
Energy use	Energy Use Intensity (kWh/m2/yr) for	Energy Use Intensity targets set out in policy
	developments	CC2.3 from 2025
To manage and reduce demand for energy.		

Thematic area	Monitoring indicator	Target (if applicable)
Embodied Carbon	Embodied carbon (kgCO2/m2) from large	Best practice
	developments which submit a Whole Life	
To manage and reduce embodied carbon.	Cycle Assessment	
BREEAM	Monitoring changes to industry standards for	Monitoring and updating the Local Plan as
To colling a large control to a section to	sustainable design and construction.	required.
To achieve a holistic approach to sustainable design and construction.		
design and construction.		
Noise and vibration	An increase in area of the Noise Action	No increase to area.
	planning important areas.	
To minimise noise, vibration levels and		
disruption to people and communities.		
Water quality	Planning permissions granted contrary to	No planning permissions granted against
	Environment Agency advice on flooding and	Environment Agency recommendations.
To protect and enhance Merton's water	water quality grounds.	
bodies.		No decrease of the Water Framework
	River water bodies classified under the Water	<u>Directive classification of 'good' ecological</u>
	Framework Directive to achieve good	status.
	ecological status.	
Water consumption	Number of developments approved against the	No planning permissions granted against
	recommendation of the statutory water /	Environment Agency recommendations.
Ensuring that Merton has a sustainable water	sewerage undertaker on low pressure /	
supply, drainage and sewerage system.	flooding grounds.	
	Number and location of water pollution	
	incidents reported to the Environment Agency	
	across Merton annually.	
	across worten annually.	
	Water quality status of water bodies across	
	borough.	

Thematic area	Monitoring indicator	Target (if applicable)
	Proportion of new residential developments	
	with a maximum water consumption target of	
	105 litres/person/day.	
Open space and nature	Net loss of designated open space for	No net loss of designated open space.
	<u>development.</u>	
To protect, connect and enhance Merton's		
natural environment (including important	Metres of main river improved and restored	
habitats, species and landscapes) and the	across Merton.	
services and benefits it provides, delivering a		
net positive outcome for biodiversity.	Biodiversity Net Gain delivered across Merton.	
Sustainable transport	Overall sustainable mode share.	Increase in overall sustainable mode share
		based on a rolling three year average.
To enhance and improve connectivity for all	Uptake of low emission vehicles.	
and increase the proportion of journeys made		Increase in registered EV vehicles in Merton
by sustainable and active transport modes.		<u>– measured annually.</u>
Health and wellbeing	Delivery of healthcare facilities identified in	n/a (Monitoring will be reported in the Health
	Merton's Local Plan.	and Wellbeing Strategy annual update
To facilitate and improve the health and		known as the Merton Story and added to the
wellbeing of the population, reduce health	Number of people taking up physical activities	AMR.)
inequalities and deliver safer and more secure	and stating they are in 'good health.'	
communities.		All development proposals that meet the
	Number of Health Impact Assessments (HIA)	Local Plan policy requirements to submit a
	carried out.	Health Impact Assessment.
Housing	Progress against borough wide affordable	Building regulation M4(3) – 10% of all new
T	housing targets.	build self-contained homes.
To provide type, quality and tenure of housing	N. alasa (I.a.a.a.)	M4(0) 000(of all and building the state of
(including specialist and affordable provision)	Number of homes built each year.	M4(2) – 90% of all new build self-contained
		homes.

Thematic area	Monitoring indicator	Target (if applicable)
to better meet Merton's demographic changes		
and local housing demand.		50% of new homes borough wide to be
		affordable across the plan period.
		Of affordable homes, 70% to be low-cost rent
		30% to be intermediate tenure.
Safe environments	Number of Health Impact Assessments carried	Health Impact Assessments carried out for
	out and type of development.	all developments required by policy.
To contribute to safe and secure environments		
for all people including people with Protected		Increase in % of people feeling safe as
Characteristics.		measured in Merton Residents Survey.
		Yearly decrease in serious crime and crime
		against people with Protected
		<u>Characteristics.</u>
<u>Infrastructure</u>	Delivery of infrastructure projects identified in	Number of infrastructure projects delivered.
	the Infrastructure Delivery Plan.	
To ensure that environmental, social and		
physical infrastructure is managed and		
delivered to support demographic change.		
Design	Increase in number of major schemes	% of planning appeals allowed by the
	reviewed by the Design Review Panel at pre –	Planning Inspector for applications originally
To create attractive, mixed-use	application stage.	refused for design reasons by the council.
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.		

Thematic area	Monitoring indicator	Target (if applicable)
Local employment	Number of people unemployed.	% of people unemployed lower than regional
	Number of new jobs created.	and national averages.
To develop and maintain a healthy labour		
market.		Increase in number of new jobs created.
Education and skills	Development of floorspace to meet the needs	Delivery of necessary education floorspace
	for pupil places.	
To ensure the education and skills provision		Yearly increase in the number of
meets the needs of Merton residents existing	Number of 16- 24-year-olds in training or	apprenticeships or work programmes.
and future labour market and improves life	apprenticeships or work programmes.	
chances for all, including people with		All major developments to provide local
disabilities and Black, Asian and other minority	Number of local people employed or in training	people with employment and/or training
ethnic groups.	as part of large or regeneration developments.	opportunities.
Economic growth and town centres	Undertake the shopping survey to measure the	Maintain the retail vacancy rate below
	retail vacancy rate in Merton's town centres	national and regional averages in Merton's
To increase the vitality and viability of existing	below national and regional rates.	town centres.
town centres, local centres and parades.		
- m		
To ensure a sufficient supply premise to meet	Maintain the industrial vacancy rate below	No net loss of employment floorspace in
demand for industry, logistics and services.	national and regional averages.	Strategic Industrial Locations.

Appendix 4 – after page 665 (MM18.1)

Core Planning Strategy (2011) policies replaced by the forthcoming Local Plan

	cies replaced by the forthcoming Local Plan
Core Planning Strategy policies	Replaced by forthcoming Policies in the Local Plan
	(submitted 2 nd December 2021)
Issues and options.	Good growth chapter
Merton's Core Strategy Spatial Vision.	Chapter 01c: Urban development objectives and
	<u>vision.</u>
Key Diagram (Figure 8.1 Key Diagram).	Figure 1: Merton's spatial strategy.
Policy CS 1 Colliers Wood.	Policy N3.1: Colliers Wood.
Policy CS 2 Mitcham Town Centre.	Policy N4.1 Mitcham.
Policy CS 3 Morden Town Centre.	Policy N5.1; Morden.
Policy CS 4 Raynes Park Local Centre.	Policy N6.1: Raynes Park.
Policy CS 5 Wandle Valley.	Policy O15.6 Wandle Valley Regional Park.
Policy CS 6 Wimbledon Town Centre.	Policy N9.1: Wimbledon.
Policy CS 7 Centres.	Strategic policy EC13.1 Promoting economic growth
	and successful high streets.
Policy CS 8 Housing Choice.	Strategic Policy H11.1 Housing choice
Policy CS 9 Housing Provision.	Strategic Policy H11.2 Housing provision
Policy CS 10 Accommodation for Gypsies	Policy No. H11.6 Accommodation for Gypsies and
and Travellers.	<u>Travellers.</u>
Policy CS 11 Infrastructure.	Strategic policy IN 14.1 Infrastructure.
Policy CS 12 Economic Development.	Strategic policy EC13.1 Promoting economic growth
	and successful high streets.
Policy CS 13 Open space, nature	Strategic Policy O15.1 Open Space, Green
conservation, leisure and culture.	Infrastructure and Nature Conservation.
Policy CS 14 Design.	Strategic Policy D12.1 Delivering well-designed and
	resilient neighbourhoods.
Policy CS 15 Climate Change.	Strategic Policy CC2.1: Promoting Sustainable
	Design to Mitigate and Adapt to Climate Change.
Policy CS 16 Flood Risk Management.	Strategic Policy F15.7 Flood Risk Management and
	Sustainable Drainage.
Policy CS 17 Waste Management.	Strategic Policy W14.4 Waste Management.
Policy CS 18 Active Transport.	Strategic Policy T16.1 Sustainable Travel.
Policy CS 19 Public Transport.	Strategic Policy T16.1 Sustainable Travel.

Core Planning Strategy policies	Replaced by forthcoming Policies in the Local Plan (submitted 2 nd December 2021)
Policy CS 20 Parking, Servicing and Delivery.	Strategic Policy T16.1 Sustainable Travel.
Chapter 27 Delivery and Implementation (Delivery of the Spatial Strategy and Core Policies).	Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework
Chapter 28 Monitoring Framework.	Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework

Sites and Policies Plan (2014) policies replaced by the forthcoming Local Plan

Sites and Policies Plan policies	Replaced by forthcoming Policies in the Local Plan
	(submitted 2 nd December 2021)
DM R1 Location and scale of	Policy TC 13.5 Merton's town centres and
development in Merton's town centres	neighbourhood parades.
and neighbourhood parades.	
DM R2 Development of town centre type	Policy TC 13.6 Development of town centre type uses
uses outside town centres.	outside town centres.
DM R3 Protecting corner/ local shops.	Policy TC13.7 Protecting corner / local shops
DM R4 Protection of shopping facilities	Policy TC 13.5 Merton's town centres and
within designated shopping frontages.	neighbourhood parades.
DM R5 Food and drink / leisure and	Policy TC13.8 Food and drink / leisure and
entertainment uses.	entertainment.
DM R6 Culture, arts and tourism	Policy TC13.9 Culture, arts and tourism development.
development.	
DM R7 Markets.	Policy not taken forward.
DM H1 Supported care housing for	Policy No. H11.4 Supported care housing for
vulnerable people or secure residential	vulnerable people or secure residential institutions for
institutions for people housed as part of	people housed as part of the criminal justice system.
the criminal justice system.	
DM H2 Housing mix.	Policy No. H11.3 Housing mix
DM H3 Support for affordable housing.	Policy No. H11.1 Housing choice
DM H4 Demolition and redevelopment of	Policy not taken forward.
a single dwelling house.	

Sites and Policies Plan policies	Replaced by forthcoming Policies in the Local Plan
	(submitted 2 nd December 2021)
DM H5 Student housing, other housing	Policy No. H11.5 Student Housing, other housing with
with shared facilities and bedsits.	shared facilities and bedsits
DM C1 Community facilities.	Policy IN14.2
	Social and Community Infrastructure
DM C2 Education for children and young	Policy IN14.2 Social and Community Infrastructure
people.	
DM E1 Employment areas in Merton.	Policy EC13.2 Business locations in Merton
DM E2 Offices in town centres.	Policy EC13.2 Business locations in Merton
DM E3 Protection of scattered	Policy EC13.3 Protection of scattered employment
employment sites.	sites
DM E4 Local employment opportunities.	Policy EC.13.4 Local Employment Opportunities
DM O1 Open space.	Policy O15.2 Open Space and Green Infrastructure
DM O2 Nature conservation, trees,	Policy O15.3 Biodiversity and Access to Nature
hedges and landscape features.	Policy O15.4 Protection of Trees
DM D1 Urban design and the public	D12.2 Urban design
realm.	
DM D2 Design considerations in all	D12.3 Ensuring high quality design for all
developments.	developments
DM D3 Alterations and extensions to	Policy D12.4 Alterations and extensions to existing
existing buildings.	<u>buildings</u>
DM D4 Managing heritage assets.	Policy D12.5 Managing heritage assets
DM D5 Advertisements.	Policy D12.7 Advertisements
DM D6 Telecommunications.	Policy D12.8 Digital infrastructure
DM D7 Shop front design and signage.	Policy D12.9 Shop front design and signage
DM EP1 Opportunities for decentralised	Not taken forward.
energy networks.	
DM EP2 Reducing and mitigating noise.	Policy P15.10 Improving Air Quality and Minimising
	Pollution
DM EP3 Allowable solutions.	Not taken forward
Policy DM EP4 Pollutants.	Policy P15.10 Improving Air Quality and Minimising
	Pollution
DM F1 Support for flood risk	Policy F15.8 Managing Local Flooding
management.	

Sites and Policies Plan policies	Replaced by forthcoming Policies in the Local Plan (submitted 2 nd December 2021)
DM F2 Sustainable urban drainage systems (SUDS) and; wastewater and water infrastructure.	Policy F15.9 Sustainable Drainage Systems (SUDS)
DM T1 Support for sustainable transport and active travel.	Policy T16.2 Prioritising active travel choices
DM T2 Transport impacts of	Policy T16.3 Managing the transport impacts of
development.	development
DM T3 Car parking and servicing	T16.4 Parking, deliveries and servicing
standards.	
DM T4 Transport infrastructure.	T16.5 Supporting transport infrastructure
DM T5 Access to the Road Network.	Not taken forward
Appendices (A –L).	Chapter 17: Appendices
Policies Map (2014)	Polices Map (submitted 2022)