

Inspectors' Matters, Issues and Questions – May 2022

Matter 15: Is the Mo4 (Morden Regeneration Zone) allocation justified, and is it in general conformity with the London Plan, consistent with national policy and effective?

Issue (i): Is the Mo4 (Morden Regeneration Zone) allocation justified, and is it in general conformity with the London Plan, consistent with national policy and effective?

Q1. Is the overall strategy for comprehensive redevelopment and concomitant phasing of the Regeneration Zone justified?

Council response:

- 15.1. Comprehensive regeneration, which includes public realm improvements, an improved commercial offer and new housing, is a long-held vision of the council. This is evident from wording in the Core Planning Strategy 2011 ([Document 0D27](#)), which refers in paragraph 13.3 to the need for 'transformational change', the Cabinet approvals of reports proposing comprehensive regeneration (Document [5D5](#) and [5D7](#)), the (full) Council meeting approval to submit the draft Local Plan ([Document 0D1](#)) that promotes the comprehensive regeneration and the July 2021 statement of continued commitment by the cross-party Morden Regeneration Steering Group, that is published on [the council's website](#) and is attached to this statement as Appendix 1.
- 15.2. As reported in the Cabinet reports (Document [5D4](#) and [5D6](#)), despite the challenges of the land assembly required to deliver comprehensive regeneration within the Morden Regeneration Zone, extensive soft market testing has shown that interest from developers is strong, as it is one of the largest opportunities for development in London, outside of zones 1 and 2.
- 15.3. The strategy of comprehensive regeneration is in conformity within the London Plan's policies GG2 'Making the best use of land' and D3 'Optimising site capacity through the design-led approach' ([Document 0D32](#)) and the Mayor(s) of London and their officers have continued to support the overall strategy of comprehensive regeneration, despite the unsuccessful award of funding, which is also demonstrated by the May 2022 Statement of Common Ground.
- 15.4. The council has proposed an additional modification AM 5.7 which seeks to improve clarity and consistency through the use of the same phrase 'comprehensive regeneration' throughout the plan (where appropriate) and the provision of the following definition: "*References to comprehensive regeneration in this policy refer to the nature and scale of the regeneration and not a delivery method*". The need for this clarification stems from the Regulation 19 response to Stage 3 draft Local Plan received from CBRE GI (now CBRE IM), who are the fund managers for the freeholder of the large site at 34-44 London Road, the Verity Trustees Ltd ([Document 0D7](#)).
- 15.5. Within Morden town centre, landownership is very fragmented. The map that was appended to the November 2019 Cabinet report ([Document 5D6](#)) and for ease of reference is attached as Appendix 2 to this statement, indicates that a significant amount of land is in the freehold ownership of public bodies, i.e. Merton Council and Transport for London. The Verity Trustees Ltd own the

freehold of the large site at 34-44 London Road, which accommodates a Sainsbury's store and offices above. Almost all the properties within the Morden Regeneration Zone have separate leasehold ownerships of varying lengths.

- 15.6. Due to the fragmented nature of the property ownership and the numerous small sites, land assembly will be required to deliver the vision of a comprehensively regenerated town centre and to avoid suboptimal densities.
- 15.7. The Plan therefore includes references to the council's qualified commitment to use its Compulsory Purchase Order (CPO) powers if considered necessary and appropriate, as stated in paragraph 5.1.59 and on page 202 of site allocation Mo4 ([Document 0D1](#)).
- 15.8. Some larger sites, such as 34-44 London Road, the publicly owned car park sites or other sites to be assembled by other parties, that are relatively unencumbered by ownership rights, could be developed without the use of CPO powers and delivered during the lifetime of this Local Plan. 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 of the policy. As informed by ongoing discussions with CBRE IM and as reflected in the May 2022 Statement of Common Ground between the council and CBRE IM (see Appendix 3 of this Statement), the council is now proposing main modifications (see below) to improve clarity that the Plan would support appropriate incremental development proposals on large sites of 0.25 hectares and above, that contribute to the delivery of comprehensive regeneration. This size limit conforms to the limit in London Plan policies H1 'Increasing housing supply' and H2 'Small sites' ([Document 0D32](#)).
- 15.9. Subject to the amount of funding secured and the type of delivery partner(s) procured, it is very likely that any large delivery project will require land assembly and a phased delivery. The phasing will be a detailed matter that will be determined once an appropriate delivery method(s) and delivery partner(s) has been procured and a plan-led approach has been approved. The surface level Kenley Road Car Park, which is owned by the council, and the adjacent Morden Station Car Park and TfL operational surface parking areas, which are owned by TfL, could be delivered within the first 5-years of the plan as they currently have site allocations for residential use, respectively Sites 65 and 61 ([Document 0D26](#)).
- 15.10. The table in the council's response to Question 3 and the ownership map in Appendix 2 to this statement, show that Site Mo4 provides the best opportunity to comprehensively regenerate a key part of Morden town centre, where two public bodies own significant quantities of freehold properties. In paragraph 5.1.19 of Morden policy N5.1 ([Document 0D1](#)) a plan-led approach, as set out in the Hawkins Brown Strategic Development Framework (SDF) ([Document 5D1](#)), is promoted and along with the guidance in the proposed new main modification below paragraph 5.1.11, large sites could be delivered independently without compromising the vision of comprehensive regeneration and its gains in homes, modern commercial space and associated public realm enhancements.
- 15.11. The strategy of comprehensive regeneration for Site Mo4, as clarified by AM5.7, is the most appropriate strategy, taking into account the reasonable alternatives,

and with the proposed main modifications, which improve clarity and introduce more flexibility, the policy is considered to be 'justified'.

Proposed Modifications:

Morden: Policy N5.1:

- a. Development proposals for large sites (0.25 hectares and above) that assist contribute to the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo41(AM5.10), will be supported.

New paragraph below 5.1.11:

New paragraph 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.

- 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.

New paragraph below 5.1.63:

New paragraph 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.

New paragraph below first paragraph in 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.

Q2. Have reasonable alternatives to the Plan's policies (i.e Policy N5.1 and Site Allocation Mo4) been assessed, in terms of alternative methods by which appropriate development may be brought forward (e.g. through incremental development of smaller parcels)?

Council response:

- 15.12. Yes, the council, in collaboration with Transport for London's Commercial Development Team, have looked at various alternative delivery methods. One example being the 12 options that were reviewed by consultants GL Hearn and reported on in the 2018 Merton Council Cabinet report (Ref. 5D4).
- 15.13. As described in more detail in the council's response to Question 1 above, the land ownership throughout the town centre is very fragmented and land assembly strategies will be required to ensure that the site can be regenerated comprehensively and avoid fragmented development and suboptimal densities in this highly accessible location.
- 15.14. The policy has however evolved in response to representations received and the changing funding circumstances, to ensure that the wording is clear, positive and flexible with regard to appropriate incremental development, and to achieve the comprehensive regeneration envisaged for the Morden Regeneration Zone (Mo4) at the end of the Plan period. For example, the final sentence of part b of draft policy N3.3 Morden, stated in both the October 2018 Stage 2 ([Document 0D17](#)) and November 2020 Stage 2A ([Document 0D15](#)) drafts of the Local Plan that: *"Any proposal that hinders the delivery of comprehensive regeneration will be resisted"*. This sentence was then amended in the July 2021 Stage 3 (0D1) draft to state (with emphasis): *"Proposals that assist the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo4, will be supported."*
- 15.15. Furthermore, proposed Additional Modification AM5.7 to paragraph 5.1.18 now clarifies that *"References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method."*
- 15.16. The above changes and the first paragraph of the 'Design and accessibility guidance' part of the Morden Regeneration Zone Site Allocation Mo4, which states (with emphasis): *"All proposals within the Morden Regeneration Zone are expected to support the above vision and to assist with the delivery of comprehensive regeneration, which realises the full potential of this highly accessible town centre site."*, demonstrates that the Plan does allow for appropriate incremental development.
- 15.17. The proposed main modifications at the bottom of Question 1 now clarifies that within Site Mo4, the Plan supports appropriate incremental development proposals on large sites of 0.25 hectares and above, that contribute to the delivery of comprehensive regeneration.
- 15.18. Although CBRE IM's site delivery proposals and proposed separate site allocation was received after the publication of the Regulation 19 draft of the Local Plan, the above referred main modification was informed by ongoing discussions with CBRE IM and, as reflected in the May 2022 Statement of Common Ground between the council and CBRE IM (attached as Appendix 3 to this Statement), both parties now agree that 34-44 London Road could be delivered as an incremental part of Site Allocation Mo4 and is referenced in the

main modification to the 'Design and accessibility guidance' part of Site Allocation Mo4.

- 15.19. Reasonable alternatives have been explored and with the proposed main modifications at the bottom of Question 1, the Plan is considered to be positively prepared and justified.

Q3. The Framework is clear¹⁴⁷ that local planning authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, using the full range of powers available to them, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes. Would the comprehensive redevelopment envisaged by the Plan in relation to Mo4 result in demonstrable gains in terms of these objectives when compared to a more incremental approach?

Council response:

- 15.20. Yes, the comprehensive regeneration of this large town centre site is on land that is suitable for meeting the council's development needs and it will secure better development outcomes.
- 15.21. In paragraph 4.20 of Merton's Housing Delivery Study ([Document 11D6](#)) it is stated that 97% of the planning applications approved in Merton over the last 15 years were for small sites (<0.25ha), accounting for 62% of all housing completions during the same 15-year period. The proposal to comprehensively regenerate this highly accessible, large town centre site, demonstrates that the council is proactive in identifying and helping to bring forward land that is suitable for meeting development needs.
- 15.22. As described in more detail in the council's response to Question 1 above, the land ownership throughout the town centre is very fragmented and land assembly strategies will be required to ensure that the site can be regenerated comprehensively and avoid fragmented development and suboptimal densities in this highly accessible location.
- 15.23. It is evident from the works set out in the Merton Cabinet reports ([Document 5D4](#) and [5D6](#)) that the council has taken a proactive role in identifying Morden town centre for regeneration and continues to work with other stakeholders such as TfL, CBRE IM and the Mayor of London, to bring forward the land for development, to provide additional housing and significant public realm improvements.
- 15.24. The table below summarises the results of a review of reasonable alternative delivery options that are set out in more detail Appendix 4 to this statement. The results demonstrate that the comprehensive regeneration would result in demonstrable gains in homes, modern commercial space and associated public realm enhancements.

¹⁴⁷ At paragraph 121

Options	Residential homes	Commercial space
a. The whole Morden Regeneration Zone (for benchmarking)	1672	8290
b. The Morden Regeneration Zone excluding 34-44 London Road	1401	7783
c. The 'Abbotsbury Triangles' only (<i>the land within the Morden Regeneration Zone, south of London Road</i>)	962	5523
d. The 'Station Site' only (<i>the land within the Morden Regeneration Zone, north of London Road</i>)	809	5108
e. The 'Station Site' only, excluding 2-44 London Road	439	2260

15.25. The council has therefore taken a proactive role in identifying and helping to bring forward land that is suitable for meeting its development needs and although the Plan is sufficiently flexible to allow some appropriate incremental development, its vision of comprehensive regeneration, will result in more land being brought forward to meet development needs and will secure better development outcomes, in accordance with the London Plan.

Q4. Against the background of the increased housing targets set in the latest London Plan, and the Local Plan's intention to step the housing trajectory, is the strategy for Mo4 positively prepared given that redevelopment of the Zone is anticipated to take place in years 10 to 15 of the plan period?

Council response:

15.26. Yes, with the proposed main modifications set out below, the strategy for Mo4 is considered to be 'positively prepared'.

15.27. As described in the responses to the other questions in this statement, the land ownership throughout the town centre is very fragmented and land assembly strategies will be required to ensure that the site can be regenerated comprehensively and avoid fragmented development and suboptimal densities in this highly accessible location. The council continues to have discussions with potential funders and landowners and has stated that it would use its Compulsory Purchase Order powers if considered necessary and appropriate.

15.28. As a result of these on-going discussions with the Transport for London Commercial Development (TfL CD) team, which are reflected in the May 2022 Statement of Common Ground attached as Appendix 5 of this Statement, between the council and the TfL CD team, the council proposes a main modification to paragraph 5.1.18 (below), which strongly encourages landowners to work together to deliver this regeneration scheme which will contribute a significant amount of homes towards the council's housing target and thereby ensure that the Plan is positively prepared.

15.29. The surface level Kenley Road Car Park, which is owned by the council, and the adjacent Morden Station Car Park and TfL operational surface parking areas,

which are owned by TfL, are relatively unencumbered sites that currently have site allocations for residential use, respectively Sites 65 and 61 with the council's adopted Sites and Policies Plan 2014 (Ref. 0D26). These sites could be delivered within the 5-10 year period of the plan, as part of a plan-led approach that optimises the capacity of the Morden Regeneration Zone.

15.30. The Morden Regeneration Zone is currently not foreseen to contribute to the council's 5-year housing supply and to improve clarity and consistency with the wording for all the other proposed site allocations within the Plan, the council is proposing a main modification below to the 'Site deliverability' part of proposed Site Allocation Mo4.

15.31. For the reasons set out above, the council considers the strategy for Mo4 to be positively prepared.

Proposed Modifications:

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-Land 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...

Site Allocation Mo4 'Morden Regeneration Zone', Site deliverability:

MM5.2 ~~Commencement within 5 years and delivery in phases within 105~~-15 years.

Q5. Following on from Matter 4 on viability, is the Plan's approach to the Morden Regeneration Zone aspirational but deliverable; and what funding is, or would be in place to deliver the proposals?

Council response:

15.32. Yes, the Plan's approach to the Morden Regeneration Zone is considered to be aspirational and deliverable as stated in paragraph 16 part b) of the NPPF or more accurately, 'developable', as defined in paragraph 68 part b) of the NPPF.

15.33. In 2015, Morden Town Centre was announced as one of the Mayor of London's Housing Zones, identifying it as one of 30 sites to be brought forward for accelerated housing development and growth. As part of the Housing Zone status, Morden was allocated £42m; however this was not grant funding to the Council, it was a loan facility available only to developers. At the time, the project was in the early stages and did not have a development partner signed up and therefore the funding was not available.

15.34. In 2017, the council and TfL supported the GLA in submitting a bid to the government's Housing Infrastructure Fund to unlock housing through the delivery of the Morden Housing Zone. While the bid was well received, it was

unsuccessful as the assessment criteria meant that other major national schemes that did not need to assemble land, were seen as more favourable for the fund.

- 15.35. In 2018, the council and TfL jointly submitted a bid to the GLA Land Fund and in 2019 it was reported to Merton's Cabinet ([Document 5D6](#)) that the project had been awarded an allocation of grant funding from the Mayor's Land Assembly Fund within the Homes for Londoner's Land Fund, subject to due diligence and agreement of funding terms and conditions. However, in March 2020, the council and TfL were advised that although the Mayor is supportive of the plans to regenerate Morden town centre, at the time, the GLA was not in a position to support the project financially, following the completion of due diligence. The Mayor's Land Fund is aimed at bringing land forward for housing quickly across London and funding was allocated to other projects that would deliver much needed housing quicker than the Morden project would be able to, including those that already had planning permission, or where sites had already been cleared.
- 15.36. The numerous options tested in support of the above funding applications showed that, with the assistance of funding, the proposals are viable, and this is reflected in the wording paragraph 5.1.58 of the Plan ([Document 0D1](#)):
"Extensive due diligence has been jointly undertaken by Merton Council and TfL ... to demonstrate that, with the assistance of grant and investment funding, the Morden Regeneration Zone Site Allocation (Mo1) can be delivered"
- 15.37. The Mayor of London still supports the proposals and in the May 2022 Statement of Common Ground, the Mayor of London provided his opinion that Merton's Local Plan is in general conformity with the London Plan.
- 15.38. The council is currently working with Homes England to explore funding opportunities for the scheme and these discussions are ongoing.
- 15.39. As reported in the Cabinet reports ([Document 5D4](#) and [5D6](#)), despite the challenges of the land assembly required to deliver comprehensive regeneration within the Morden Regeneration Zone, extensive soft market testing has shown that interest from developers is strong, as it is one of the largest opportunities for development in London, outside of zones 1 and 2.
- 15.40. Furthermore, the three major landowners within the Morden Regeneration Zone: Merton Council, Transport for London and the freeholders of 34-44 London Road, support regeneration within Morden town centre and as set out in the November 2019 Cabinet Report ([Document 5D6](#)), Merton Council and Transport for London have publicly committed significant funding, including their land holdings. The freeholders of 34-44 London Road have demonstrated their intent on contributing to the delivery of the regeneration plans with their recommendation in Appendix 3, on p.56 of their Regulation 19 response ([Document 0D7](#)), that the 'Site deliverability' text for Mo4 should specify that their site could be delivered as phase 1, within the first 5 years of the Plan period.
- 15.41. Importantly, the council has clearly stated that it would use its Compulsory Purchase Order powers if considered necessary and appropriate and a cross-party steering group of elected Members has supported the project since 2017.
- 15.42. There are ongoing discussions and investigations concerning funding options for land assembly and with the proposed modifications set out in Question 1 and 5

above, that respectively clarify that proposals on large sites of 0.25ha or more would also be supported and that the development will be delivered in years 5-15 of the Plan period, the Plan's approach to the Morden Regeneration Zone is considered to be aspirational and deliverable.

Q6. Have Policy N5.1 and site allocation Mo4, insofar as they relate to the Regeneration Zone, been shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees?

Council response:

15.43. Yes, the policy and site allocation has been shaped by engagement, which in effect started in 2008!

The Vision for Morden Town Centre (2008)

15.44. The draft vision for Morden was adopted by LBM in 2009 following extensive public consultation in 2008 on the aims and objectives of the proposed regeneration. 80% of respondents thought that the aims and objectives of the vision were right for Morden.

15.45. The aims and objectives, which still relate to those on policy N5.1 and site allocation Mo4 were set out as:

- Capitalising on Morden's excellent transport links and attractive suburban surroundings to make Morden a vibrant centre that people want to visit not simply pass through;
- Improving the quantity and quality of commercial, residential and leisure uses, with a range of uses that is appropriate to a District Centre;
- Enhancing the accessibility between the town centre and its suburban hinterland and open spaces, by reducing severance caused by through traffic and greening Morden through tree planting and improved pedestrian routes;
- Achieving high quality urban design, architecture and public realm incorporating high quality spaces and streets with pedestrians as the priority;
- Providing more opportunities for the community to meet, socialise and make better use of their town centre through provision of attractive, safe and accessible public spaces and community, social, leisure and cultural facilities.

Merton Core Planning Strategy (Adopted 2011)

15.46. LBM's Core Planning Strategy (CPS) ([Document 0D27](#)) was adopted in 2011 following five rounds of consultation. The CPS sets out the strategic approach to Morden as a Sub-Area. Consultation raised concerns that Morden was not able to serve local residents and that it acts as a transport hub rather than a destination in its own right. The CPS endorsed the proposed regeneration objectives which had been previously consulted on as part of the Vision for Morden, where 80% of local people supported the regeneration aims and objectives.

15.47. Many of the aims and objectives in policy N5.1 and site allocation Mo4 still relate well to those in the adopted policies within the CPS, which seeks to deliver between 1,450 and 1,800 new homes within Morden and “*To regenerate Morden through intensified development in and around the town centre, creating a distinctive and vibrant centre by making more of what Morden has to offer. A plan-led approach will increase development capacity and make more efficient use of land by incorporating higher density housing and commercial opportunities; exploiting Morden's excellent public transport links, while conserving and enhancing the character and distinctiveness of the adjacent suburban neighbourhoods.*”

Merton Site and Policies Plan (Adopted 2014)

15.48. LBM's Sites and Policies Plan (SPP) ([Document 0D26](#)) was adopted in 2014 following four rounds of consultation. The SPP sets out the development management policies and site allocations and is considered alongside the Merton Core Planning Strategy. This adopted Local Plan document supports development of six major sites within the Morden Town Centre for a variety of suitable town centre uses.

15.49. Except for the commercial properties fronting London Road, almost all the land north of London Road within site allocation Mo4, is allocated for housing and other town centre type uses by means of the following sites in the SSP:

- 57 Morden Station Offices and Retail Units
- 58 Sainsbury's (Peel House) Car Park Site Proposals
- 61 Morden Station Staff car park Site Proposals
- 65 Kenley Road Car Park Site Proposals

Morden Station Planning Brief (Adopted 2014)

15.50. The Station Planning Brief covers all the land north of London Road within site allocation Mo4, except for the parade at 2-32 London Road. The Brief highlighted development opportunities and constraints, set out design guidance and referenced relevant planning policy. The key topics raised at consultation are reflected on policy N5.1, site allocation Mo4 and the Hawkins Brown SDF ([Document 5D1](#)):

- Building heights and improvements to existing style and appearance;
- Support for a different retail offer;
- Support for extending Kendor Gardens into the Town Centre;
- Support for delivering housing provided it comes forward with the right infrastructure to support it;
- Support for community facilities to be provided; and
- Strong support for improving the public realm, especially bus interchange and pedestrian facilities.

Making More of Morden – Delivering the Vision for Morden Town Centre 2016
([Document 5D8](#))

- 15.51. In 2015, LBM consulted local residents, business and stakeholders on the priorities for Morden should any future regeneration come forward. A total of 1,265 responses were received in response to a consultation survey which sought to test views on the answers to given to questions in 2008.
- 87% of people agreed with the proposed masterplan boundary shown for Morden Town Centre
 - 86% of people indicated that Morden has good access to public transport, good quality housing and that the suburban character of the surrounding areas, as well as the parks, green spaces and leisure facilities, were the best features.
 - 88% of people indicated that the key issues that needed addressing are poor quality and range of shops, pedestrian overcrowding and the bus standing area outside of the tube station.
- 15.52. The endorsed masterplan boundary is the wider Morden town centre area which is within the Opportunity Area.

Merton Local Plan (Stage 1 consultation 2017/2018)

- 15.53. Between October 2017 and January 2018, the council undertook a consultation which included a specific questionnaire on the town centre regeneration and the Draft Local Plan. The questionnaire was completed by 156 individuals. Responses to all questions showed an overwhelming level of agreement for the principles set out in these questions (between 75% - 90% for each area) and most of the responses confirmed previous results. However, the relatively unique (Morden survey) matter below has informed the wording for policy N5.1:
- 83% of people agreed with the principle of conserving and enhancing the suburban neighbourhoods and the strong 'green' infrastructure provided by Upper Morden Conservation Area, St Helier Estate, Morden Hall Park and Morden Park and ensure all development respects and enhances local character.

More Morden: Creating a Vision for Morden (September 2018) ([Document 5D9](#))

- 15.54. In September 2018, Kanda Consulting (on behalf of the council and TfL) carried out a series of focus groups, which included representers from a local business group Love Morden, and street-based consultation events. These were aimed to refresh and test local views on the principle of regeneration and capture feedback on the priorities for Morden to inform the development of a Strategic Design Framework to support the procurement of a development partner for the project.
- 15.55. Over 160 local people took part in these events. 97% of people who provided feedback reported that they felt that Morden town centre needed to be improved. There were no responses to suggest that the town centre should remain as it is. The top five priorities identified for the regeneration in the feedback were:

- Reduced traffic congestion;
- Improved public spaces in the town centre;
- The need for affordable housing options;
- Arts, culture and events; and
- An improved shopping offer.

15.56. Feedback during the consultation indicated that the majority of people who took part in the events were eager to see the regeneration delivered and were keen to be involved in the process.

Local Primary School Consultation

15.57. In January 2019, Kanda Consulting (on behalf of LBM and TfL) carried out a workshop with 30 Year 6 students from five local primary schools. The workshop was focused on engaging the next generation of Morden Town Centre residents and users, understanding the aspirations of young people and capturing new forward-thinking ideas. The workshop was very successful and the students were thoroughly engaged in participating in the following activities:

- Mapping the Town Centre – identifying key landmarks and physical parameters of Morden.
- What I know in Morden – discussion on which facilities the students were most familiar with.
- Morden 2030 – a drawing activity designed for students to capture their vision for Morden in 2030 in a poster.

15.58. The actions, findings and changes associated with the Local Plan Stage 2: October 2018 – January 2019, Stage 2a: November 2020 – February 2021 and Publication pre-submission Stage 3: 22 July 2021 - 6 September 2021 are set out in detail within the council's Local Plan Consultation Statement 2021([Document 0D8](#)).

15.59. Besides the more formal consultations with statutory consultees, such as English Heritage or GLA officers or officers from neighbouring boroughs, of which most are listed in the Local Plan Consultation Statement 2021([Document 0D8](#)), officers also attend community meetings such as those held by the Merton Park Ward Residents' Association and the Morden Forum. Officers meet with potential developers informally or more formally - as part of soft market testing and with owners/occupiers of sites within the Morden Regeneration Zone, such as CBRE IM and on neighbouring land, such as the National Trust or the GPs at the Morden Road Clinic.

15.60. It is clear from the history of consultation and the recent consultation, such as the Statements of Common Ground in Appendix 3 and 5 of this statement that that Policy N5.1 and site allocation M04 has been shaped engagement with a variety consultees.

Appendix 1 – Statement from the Morden Regeneration Steering Group

July 2021

The Morden Regeneration Steering Group is a cross party advisory group, which includes Councillors from the 4 wards that intersect within Morden Town Centre, i.e. Cannon Hill, Merton Park, Ravensbury and St Helier. Members agreed the following cross party communications statement at the Morden Regeneration Steering Group meeting held 27 July 2021:

The council remains fully committed to regenerating Morden into a thriving town centre, which includes new homes, improved transport interchange, revitalising retail, and modern business space.

Over the next two years, Merton council will be investing £300,000 to improve the look and feel of the town centre, supporting business recovery from the pandemic, providing new public spaces, and art installations. We will also be building on and creating increased co-operation between community groups and business as we move forward on the project.

Merton is working in partnership with Transport for London to actively pursue funding opportunities to develop, fund and deliver on this project despite the many challenges from the pandemic, and people's evolving preferences in the way they work.

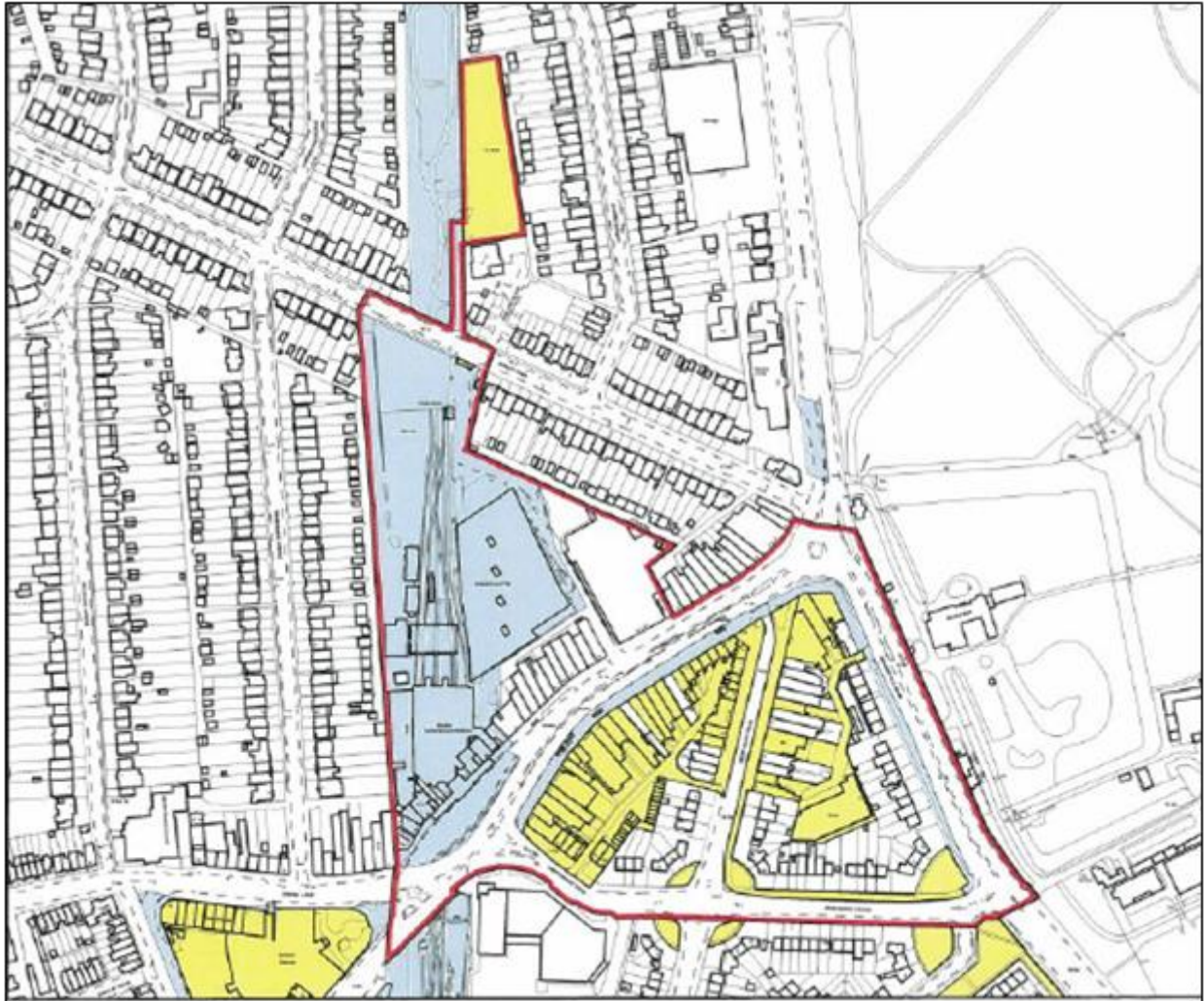
Our vision is to revitalise the town centre and build on all the great things Morden has to offer, including great transport connectivity, a National Trust Park, independent businesses, and community facilities, including the new state of the art leisure centre.

This is a long-term project, which will require collaboration with partners and cross-party working as collectively we all want to see a thriving and regenerated Morden which brings new homes, jobs, and investment in the local infrastructure.

Appendix 2 – Freehold ownership by public bodies in Morden town centre, in 2018

Yellow properties – Merton Council freehold ownership

Blue properties – Transport for London freehold ownership



Appendix 3 – Statement of Common Ground between LBM and CBRE IM, May 2022

Merton Local Plan Review

Statement of Common Ground between London Borough of Merton and CBRE IM

Areas of agreement

- The inclusion of a reference to the Plan's support for freestanding development proposals on large sites that are 0.25 hectares and above, such as the site at 34-44 London Road, that contribute to comprehensive regeneration objectives as described in the policy, would improve clarity and ensure that the Plan is 'justified'.
- The inclusion of references in the proposed Site Allocation Mo4, to the relevant features of the large site at 34-44 London Road, such as the land use and ownership, will improve the clarity of the plan.

The matters listed above are captured in proposed modifications submitted on 20 May 2022.

Continued dialogue

- There remain matters, including some relating to the proposed modifications, where the parties are not in agreement. However, both parties are committed to continue exploring these matters in the course of further discussions in advance of the relevant hearings dates, in the hope of reaching further common ground.

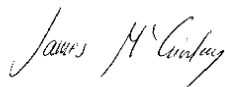
Signatories

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

Signed for London Borough of Merton by:

Name – James McGinlay

Job Title – Assistant Director for Sustainable Communities



Signature -

Date – 20 May 2022

Signed for on behalf of CBRE IM:

Name – Mike Straw

Job Title – Managing Director, MSP+D Ltd on behalf of CBRE IM

Signature - Mike Straw

Date – 20 May 2022

Appendix 4 – Alternative options for the delivery of the Morden Regeneration Zone

Introduction

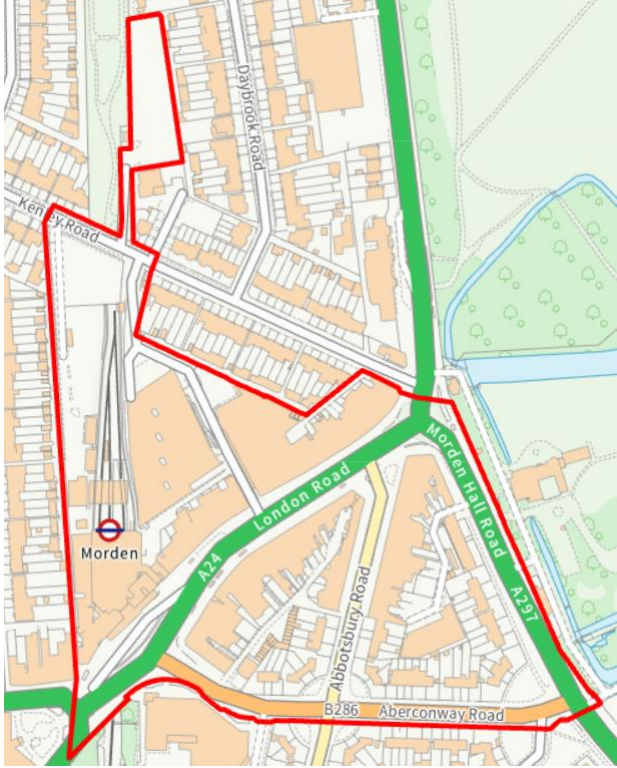

1. As set out on the first page of document 5D1 [Morden Strategic Development Framework 2019](#), in 2018 Merton Council and Transport for London jointly appointed Hawkins Brown to develop a Strategic Development Framework (SDF) which sets out the vision, core objectives, and 'first principles' for the regeneration of Morden Town Centre.
2. The SDF was informed by consultation results, numerous technical studies and the inputs of officers from Merton Council and Transport for London.
3. Hawkins Brown were also required to test the development capacity of various sites within Morden town centre. The results of this part of the Hawkins Brown work will also inform the assessment of likely forthcoming procurement for a development partner(s) and can therefore not be published in full at this stage. Some of the findings of this work have however been used to inform this options assessment and some of the options have been developed by officers.

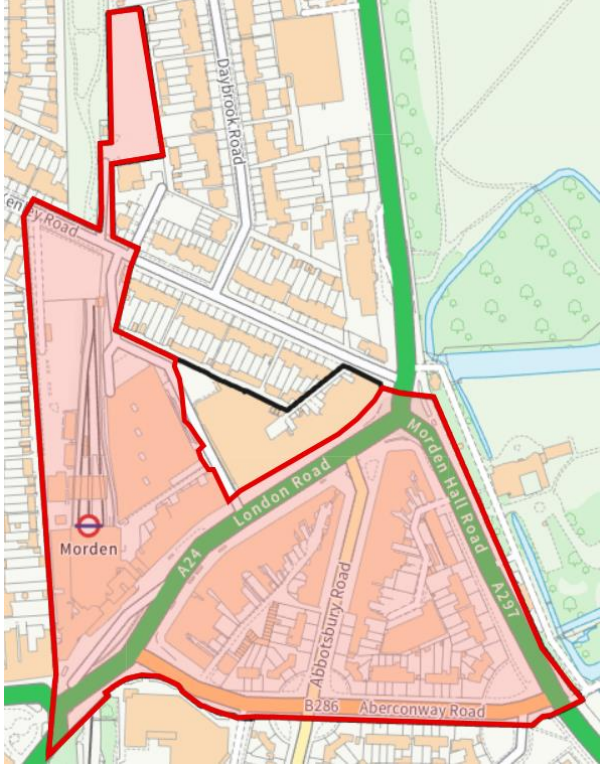
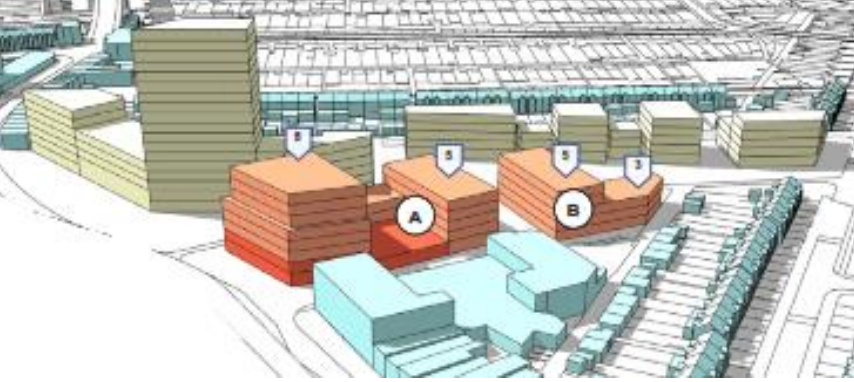
Assumptions

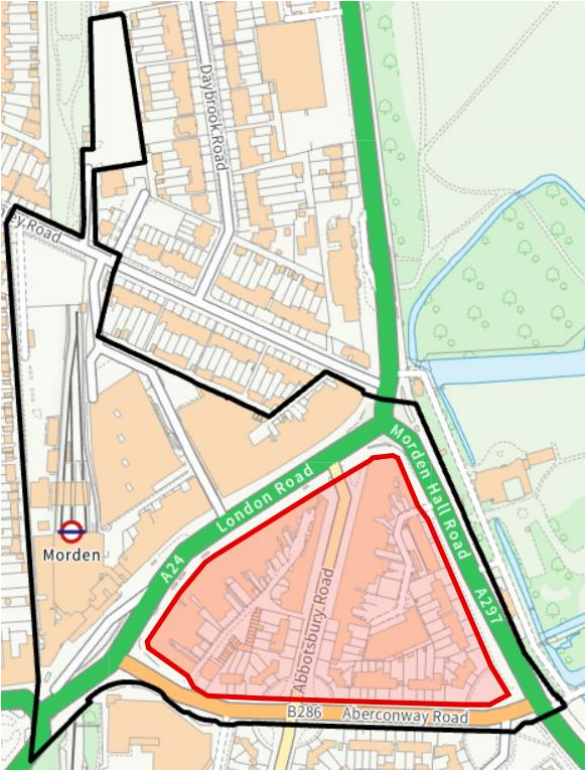

4. The residential units sizes have been derived from the London Plan and assumes an equal mix of 1, 2 and 3 beds, therefore an average unit size of 753sqft or 70sqm has been used.
5. The number of residential units have been calculated from the Net Internal Area (NIA), which is assumed at 76% of the Gross External Area (GEA).

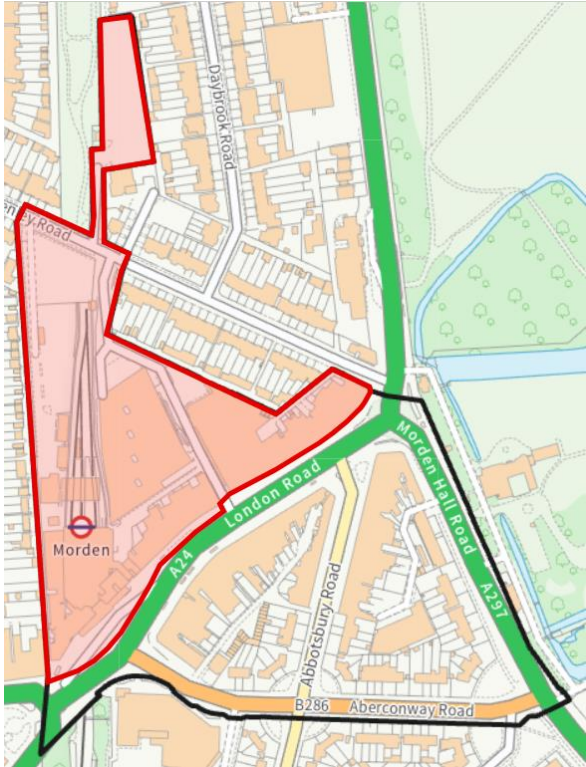

Options

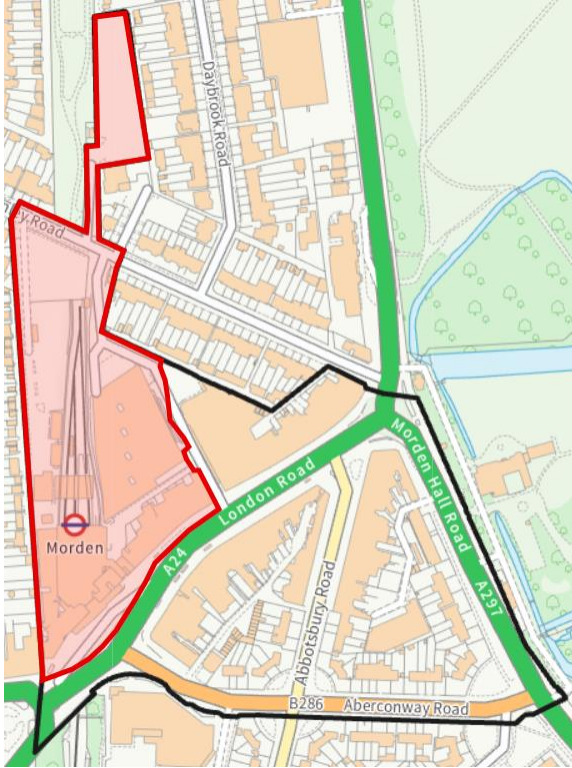
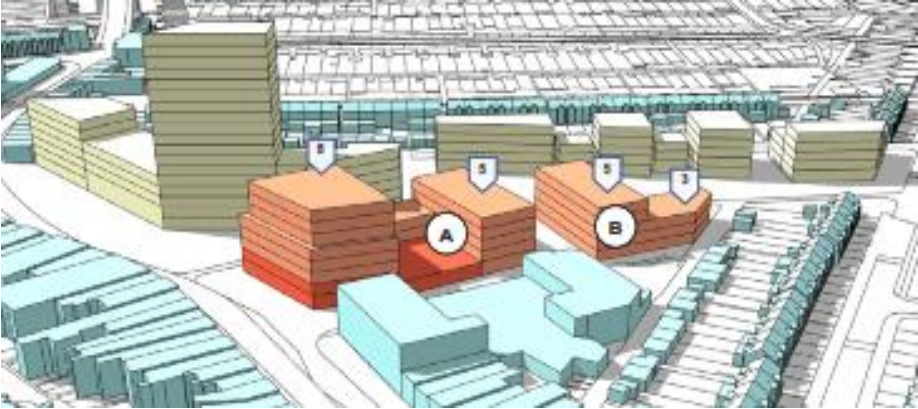
6. The following development options have been tested to assess the outcomes of a more incremental delivery approach:
 - a. The whole Morden Regeneration Zone (for benchmarking)
 - b. The Morden Regeneration Zone excluding 34-44 London Road
 - c. The 'Abbotsbury Triangles' only (the land within the Morden Regeneration Zone, south of London Road)
 - d. The 'Station Site' only (the land within the Morden Regeneration Zone, north of London Road)
 - e. The 'Station Site' only excluding 2-44 London Road

Options	Features						
<p>a. The whole Morden Regeneration Zone (for benchmarking)</p> 	<p>Assumptions</p> <ol style="list-style-type: none"> 1. There will be a reasonable quantity of non-residential floor space at ground level fronting London Rd and possibly also at first floor level above. 2. A similar sized replacement supermarket to be provided at ground level fronting London Rd and possibly some office at first floor level above. 3. Except for disabled parking, no replacement car parking to be provided in line with London Plan parking standards for PTAL 5-6. 4. An off-road ground level bus stand area will be provided <p>Results</p>  <table> <tr> <td>Residential GEA</td><td>153967m²</td></tr> <tr> <td>Non Residential GEA</td><td>8290m²</td></tr> <tr> <td>Residential Homes (@ 70sqm of NIA)</td><td>1672</td></tr> </table>	Residential GEA	153967m ²	Non Residential GEA	8290m ²	Residential Homes (@ 70sqm of NIA)	1672
Residential GEA	153967m ²						
Non Residential GEA	8290m ²						
Residential Homes (@ 70sqm of NIA)	1672						

Options	Features						
<p data-bbox="277 250 990 320">b. The Morden Regeneration Zone excluding 2-44 London Road</p> 	<p data-bbox="1066 250 1267 280">Assumptions</p> <ol data-bbox="1021 288 2130 491" style="list-style-type: none"> 1. 2-44 London Road, which includes the Sainsbury's site, is not developed. 2. There will be a reasonable quantity of non-residential floor space at ground level fronting London Rd and possibly also at first floor level above. 3. Except for disabled parking, no replacement car parking to be provided in line with London Plan parking standards for PTAL 5-6. 4. The bus stand area will be provided elsewhere <p data-bbox="1021 533 1133 563">Results</p>  <table data-bbox="1021 1023 1738 1134"> <tbody> <tr> <td>Residential GEA</td><td>129049m²</td></tr> <tr> <td>Non Residential GEA</td><td>7783m²</td></tr> <tr> <td>Residential Homes (@ 70sqm of NIA)</td><td>1401</td></tr> </tbody> </table>	Residential GEA	129049m ²	Non Residential GEA	7783m ²	Residential Homes (@ 70sqm of NIA)	1401
Residential GEA	129049m ²						
Non Residential GEA	7783m ²						
Residential Homes (@ 70sqm of NIA)	1401						

Options	Features						
<p>c. The 'Abbotsbury Triangles' only (the land within the Morden Regeneration Zone, south of London Road)</p> 	<p>Assumptions</p> <ol style="list-style-type: none"> 1. There will be a reasonable quantity of non-residential floor space at ground level fronting London Rd and possibly also at first floor level above. 2. Except for disabled parking, no car parking to be provided in line with London Plan parking standards for PTAL 5-6. 3. The bus stand area will be provided elsewhere <p>Results</p>  <table> <tr> <td>Residential GEA</td><td>88638m²</td></tr> <tr> <td>Non Residential GEA</td><td>5523m²</td></tr> <tr> <td>Residential Homes (@ 70sqm of NIA)</td><td>962</td></tr> </table>	Residential GEA	88638m ²	Non Residential GEA	5523m ²	Residential Homes (@ 70sqm of NIA)	962
Residential GEA	88638m ²						
Non Residential GEA	5523m ²						
Residential Homes (@ 70sqm of NIA)	962						

Options	Features						
<p>d. The 'Station Site' only (the land within the Morden Regeneration Zone, north of London Road)</p> 	<p>Assumptions</p> <ol style="list-style-type: none"> 1. There will be a reasonable quantity of non-residential floor space at ground level fronting London Rd and possibly also at first floor level above. 2. A similar sized replacement supermarket to be provided at ground level fronting London Rd and possibly some office at first floor level above. 3. Except for disabled parking, no replacement car parking to be provided in line with London Plan parking standards for PTAL 5-6. 4. The bus stand area will be provided elsewhere <p>Results</p>  <table> <tr> <td>Residential GEA</td><td>74518m²</td></tr> <tr> <td>Non Residential GEA</td><td>5108m²</td></tr> <tr> <td>Residential Homes (@ 70sqm of NIA)</td><td>809</td></tr> </table>	Residential GEA	74518m ²	Non Residential GEA	5108m ²	Residential Homes (@ 70sqm of NIA)	809
Residential GEA	74518m ²						
Non Residential GEA	5108m ²						
Residential Homes (@ 70sqm of NIA)	809						

Options	Features						
<p>e. The 'Station Site' only excluding 2-44 London Road</p> 	<p>Assumptions</p> <ol style="list-style-type: none"> 1. The station building, TfL Car Park, Peel House Car Park, 46-62 London Road and Kenley Road Car Park is redeveloped but 2-44 London Road is as existing. 2. There will be a reasonable quantity of non-residential floor space at ground level fronting London Rd and possibly also at first floor level above. 3. If the access link to Kenley Road and the piazza to the east of the station entrance, as shown in the HB SDF, is retained, then a reasonable quantity of non-residential floor space at ground level could be fronting the piazza. 4. Except for disabled parking, no replacement car parking to be provided in line with London Plan parking standards for PTAL 5-6. 5. The bus stand area will be provided elsewhere <p>Results</p>  <table> <tr> <td>Residential GEA</td><td>40411m²</td></tr> <tr> <td>Non Residential GEA</td><td>2260m²</td></tr> <tr> <td>Residential Homes (@ 70sqm of NIA)</td><td>439</td></tr> </table>	Residential GEA	40411m ²	Non Residential GEA	2260m ²	Residential Homes (@ 70sqm of NIA)	439
Residential GEA	40411m ²						
Non Residential GEA	2260m ²						
Residential Homes (@ 70sqm of NIA)	439						

Appendix 5 – Statement of Common Ground between LBM and TfL Commercial Development, May 2022

Statement of Common Ground – London Borough of Merton and Transport for London Commercial Development Team

Introduction

1. This statement of common ground (SCG) between the London Borough of Merton (LBM) and Transport for London's Commercial Development Team (TfL CD) is to address the matters raised by TfL CD in [their response on 6 September 2021](#) to LBM's Merton draft Local Plan Regulation 19 submission version ([LBM Examination Library Reference 0D1](#)) concerning Chapter 05 Morden.
2. Similar to the clarification in TfL CD's 6 September 2021 representation, the views in this SCG are the views of the TfL CD planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. A separate SCG (Ref. [0D13g](#)) has been prepared with representatives from the TfL Spatial Planning team.

Matters of Agreement

Delivery

3. LBM and TfL CD will continue to collaborate on the delivery of the Morden Regeneration Zone in accordance with a plan-led approach and agree that, in accordance with proposed major modification MM5.2 (~~Commencement within 5 years and delivery in phases within 105~~-15 years.), the site can be delivered over the 5-10 and 10-15 year periods of the plan, with the assistance of grant and investment funding.

Comprehensive Regeneration

4. Both parties agree that, to enable incremental development that assists the delivery of comprehensive regeneration and avoids fragmented development and suboptimal densities in this highly accessible location, all proposals within the Morden Regeneration Zone will be expected to support the vision as set out in the site allocation Mo1.
5. Clarity regarding the use of the phrase ‘comprehensive regeneration’ is improved with proposed additional modification AM5.7 ([Ref. 0D4b](#)) to paragraph 5.1.18, which introduces the sentence: “*References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method.*” and the inclusion of the phrase “*and landowners are strongly encouraged to work together*” to this paragraph, as main modification MM5.1b, will ensure that the plan is positively prepared.

Tall Buildings

6. The Strategic Heights Diagram for the Morden Regeneration Zone, introduced with proposed major modification MM3.1 ([Ref. 0D4a](#)), which is informed by the Hawkins Brown SDF ([Ref. 5D1](#)), now clearly indicates the maximum heights for the site allocation.

Removal of the proposed Wider Morden Town Centre Area (WMTCA)

7. As a result of proposed major modification MM3.1 ([Ref. 0D4a](#)), with tall buildings only being supported within the Morden Regeneration Zone (Mo1), the designation of the WMTCA is no longer justified, as development proposals within this area could be addressed by means of other policies within the draft Local Plan and the London Plan. Both parties therefore agree that, in accordance with proposed main modification MM5.1 ([Ref. 0D4a](#)), all references to the WMTCA should be removed.

Single Site Allocation

8. Both parties agree that the Morden Regeneration Zone should have a single site allocation which will enable the delivery of the vision of comprehensive regeneration through a plan-led approach in this highly accessible location, as set out in proposed site allocation Mo1. The draft policy is sufficiently flexible to allow for suitable incremental development that assists the delivery of comprehensive

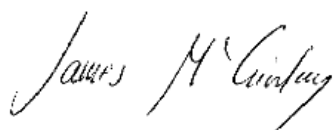
regeneration and avoids fragmented development that does not enable the delivery of the vision, and suboptimal densities.

Governance arrangements

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

London Borough of Merton.

Signed: James McGinlay

A handwritten signature in black ink, reading 'James McGinlay'.

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

Date: 20 May 2022

Transport for London

Signed: Rosanna Sterry

A handwritten signature in black ink, reading 'Rosanna Sterry'.

Position: Planning and Development Manager

Date: 20 May 2022