
Inspectors' Matters, Issues and Questions – April 2022

Matter 5: Is the Plan's approach to Metropolitan Open Land (MOL) justified, consistent with national policy, and in general conformity with the London Plan?

(NB: Questions on the MOL implications of Site Wi3 are set out in relation to Matter 14)

Issue (i) Are the exceptional circumstances for any MOL boundary alterations set out in the Plan fully evidenced and justified, is the need for any changes to MOL established in strategic policies, and are the policies of the Plan insofar as relevant to MOL in general conformity with the London Plan?

Q1. Is the Local Plan's approach to MOL justified, consistent with national policy and in conformity with the London Plan?

Council response:

- 5.1. Yes, the council considers that its approach to MOL, as set out in the Local Plan, is justified, consistent with national policy and in conformity with the London Plan, with the proposed modifications as set out in the responses below.
- 5.2. For clarity, Merton does not have any Green Belt land, as described in NPPF Chapter 13 ([Document 0D20](#)). However, in accordance with Policy G3 of the London Plan, MOL within Merton should be afforded the same status and level of protection as Green Belt.
- 5.3. There are 9 MOL sites within the borough, totalling over 960 hectares (Appendix 1). All MOL sites and boundaries are clearly illustrated on the Policies Map (page 6 of [Document 0D2](#)) and listed in the Appendix on page 585 of the Plan ([Document 0D1](#)).
- 5.4. Policies O15.1 and O15.2 clearly set out the borough's intentions to protect and enhance MOL, in accordance with national policies and the London Plan requirements. These ensure that the characteristics of openness and permanence are preserved over the lifetime of the Plan.
- 5.5. As set out in both national policy and the London Plan, alterations to MOL boundaries should be undertaken through the Local Plan process, altered only when exceptional circumstances are evidenced and justified. Submitted documents including [Document 15D1](#) and [Document 18D3](#) set out how the initial review of sites was conducted, and then followed up with further site reviews by the council to ensure all information considered in the Local Plan was as up-to-date as possible. These reviews were undertaken using a methodology in line with the London Plan G3 criteria and the essential characteristics of Green Belt as set out in the NPPF. The proposed amendments to the MOL boundaries are based on proportionate and up to date evidence and have been subject to consultation through the Plan's staged process.

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- 5.6. The council does not consider the release of any MOL site in its entirety is required or necessary for any strategic reasons in this Local Plan. The Plan is clear that MOL is to be protected from inappropriate development.
- 5.7. The 12 MOL boundary amendments proposed through this Plan are minimal and are not of a strategic nature. They comprise minor adjustments which are practical, primarily either to correct mapping errors and anomalies, or to reflect the current built form that has come forward through approved planning applications. Other exceptional circumstances for 2 amendments have been agreed by the council (Appendix 1).
- 5.8. In terms of conformity with the London Plan, the Mayor of London has provided his opinion that Merton's Local Plan is in general conformity with the London Plan, and no specific issues have been raised by the GLA throughout the Local Plan process.

Q2. The Green Infrastructure Study contains several recommendations⁵⁴ for adjustments to MOL boundaries:

a. Is it clear whether the Plan has taken these recommendations forward?

Council response:

- 5.9. Yes, the Plan clearly shows all MOL designations on the Policy Maps (page 6 of [Document 0D2](#)). All of the borough's 9 MOL sites are also listed in Chapter 17 Appendices (page 585) of the Plan ([Document 0D1](#)).
- 5.10. [Document 18D3 MOL Policies Map summary of changes](#) also provides details on the final proposed changes to MOL boundaries through the Local Plan.
- 5.11. The work undertaken as part of the Green Infrastructure Study ([Document 15D1](#)) included a review of the environmental policy map designations in the borough, including Metropolitan Open Land, open space, site of importance for nature conservation (SINC) and green corridor. The Study provided the council with a number of recommendations for the Policies Maps.
- 5.12. In the case of MOL alterations, these recommendations only informed part of the assessment for exceptional circumstances. The sites were subsequently reviewed by the council, to ensure that any proposed boundary changes were based on site evidence that was as up-to-date as possible. Further work by the council included site visits and assessments, mapping quality checks, consideration of up-to-date evidence and a number of other important elements of the borough's evidence base, including the Merton Strategic Housing Market Assessment ([Document 11D8](#)), feedback to the Local Plan consultations and any relevant site-specific circumstances. This enabled a complete and robust assessment of each parcel of MOL in the borough.

⁵⁴ Including at paragraph 3.57, 3.78, 3.83

5.13. The final recommendations taken forward in the Policies Maps ([Document 0D2](#)) are based on both the Green Infrastructure Study and subsequent council reviews. As a result, there are some differences between the recommendations set out in the Green Infrastructure Study, and the council's final recommended Policy Map changes.

5.14. All MOL Policy Map designations are clearly illustrated on the Policy Maps ([Document 0D2](#)) and listed in the Appendix ([Document 0D1](#)) of the Plan.

Q2b. If so, are the exceptional circumstances to make such amendments fully evidenced and justified?

Council response:

5.15. Yes, the council's review of the borough's MOL boundaries and the proposed amendments to the MOL boundaries are fully evidenced and justified.

5.16. Both NPPF and the London Plan set out that Green Belt / MOL boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of Local Plans. London Plan Policy G3(C) specifies that exceptional circumstances should take into account the purposes for including land in MOL set out in Policy G3(B).

5.17. While there is no clear definition or guidance on what constitutes exceptional circumstances to justify alterations to MOL boundaries, examples from other London borough Local Plan examinations suggest that such justifications must be responsive to local conditions and take into account a number of factors. These factors may include (but are not limited to):

- Unique or significant housing or employment need and a lack of supply of more preferential sites;
- Adverse implications for the sustainable development strategy within the borough;
- Inherent sustainability of growth in a particular direction;
- Tightly drawn MOL / Green Belt boundaries and constraints on alternative sites;
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents; and
- Boosting housing delivery in areas with past issues of deliverability in order to increase the supply of affordable housing.

5.18. Exceptional circumstances should also take into consideration the wider, and other important, elements of the Local Plan evidence base, such as the housing and employment needs and deliverability of site allocations.

5.19. It should be noted that the council does not propose to remove any individual site of MOL in its entirety. As illustrated on the Policies Map ([Document 0D2](#)), there are 9 MOL sites within the borough, totalling over 960 hectares. The 12 MOL boundary amendments proposed through this Plan are minimal, and are not of a

strategic nature. They comprise primarily of minor boundary adjustments which are practical, either to correct mapping errors and anomalies, or to reflect the current built form that has come forward through approved planning applications.

5.20. With reference to the Green Infrastructure Study (Document 15D1), the summary of MOL changes (Document 18D3) and Appendix 1, the exceptional circumstances have been set out for relevant sites.

5.21. The council considers that the review process undertaken for the Local Plan sets out a justified and appropriate evidence base for MOL, demonstrating exceptional circumstances where these have been identified.

Q2c. Is the need for any such changes to MOL established in strategic policies?

Council response:

5.22. NPPF 140 sets out:

“...Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period...”

5.23. In accordance with Policy G3 of the London Plan (Document 0D32) MOL is afforded the same status and level of protection as Green Belt, and any alterations to the boundary of MOL should be undertaken through the Local Plan process.

5.24. It is important to note that the council doesn't consider any of the proposed MOL boundary amendments to be of a strategic significance. The Local Plan does not propose to remove any individual site of MOL in its entirety.

5.25. As illustrated on the Policies Map (Document 0D2), there are 9 MOL sites within the borough, totalling over 960 hectares. The 12 MOL boundary amendments proposed through this Plan are minimal and are not of a strategic nature. They comprise minor adjustments which are practical, either to correct mapping errors and anomalies, or to reflect the current built form that has come forward through approved planning applications.

5.26. Two of the sites where MOL is proposed to be removed include Site Allocations Mo3 Imperial Sports Ground Tooting and Mitcham Hub and Wi3 All England Lawn Tennis Club. Both of these proposed amendments are of a minor nature in terms of the changes to the MOL boundaries, and propose to remove a small portion of MOL in each case (refer to Appendix 1).

5.27. With reference to Strategic Policy O15.1(a) and (h), both site allocations promote healthy lifestyles through enabling long term investment in sports, leisure and

community uses and improvements to other open spaces and areas of nature conservation.

- 5.28. Upon review of the Green Infrastructure policies in the Local Plan, a modification is proposed to add two new paragraphs to the supporting text in *Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation*. This modification makes it clear that the Plan is proposing to make a number of minor MOL boundary adjustments, and the reasons for these changes.

Proposed Modification:

Add two new paragraphs after paragraph 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.

Q2d. Are any detailed alterations to MOL boundaries clearly articulated in the Plan, either in strategic or non-strategic policies, and on the policy map?

Council response:

- 5.29. NPPF 140 sets out:

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans

- 5.30. The MOL boundaries are clearly illustrated on the Policies Map (Document 0D2) and the MOL sites are clearly listed in the Appendices on page 585 of the Plan ([Document 0D1](#)), which sets out each site's MOL number, name and neighbourhood, corresponding with the Policies Map.

5.31. The submitted version of the Plan and Policies Map illustrates only the MOL designations that are proposed to be taken forward as part of the Plan. Proposed alterations to all Policy Map designations, including MOL, were clearly articulated through the Local Plan process, with boundary amendments provided for consultation on the Local Plan consultation webpage, including Maps illustrating the areas proposed to be altered.

5.32. Two modifications are proposed to the MOL Policy Maps, as set out below.

Proposed modifications:

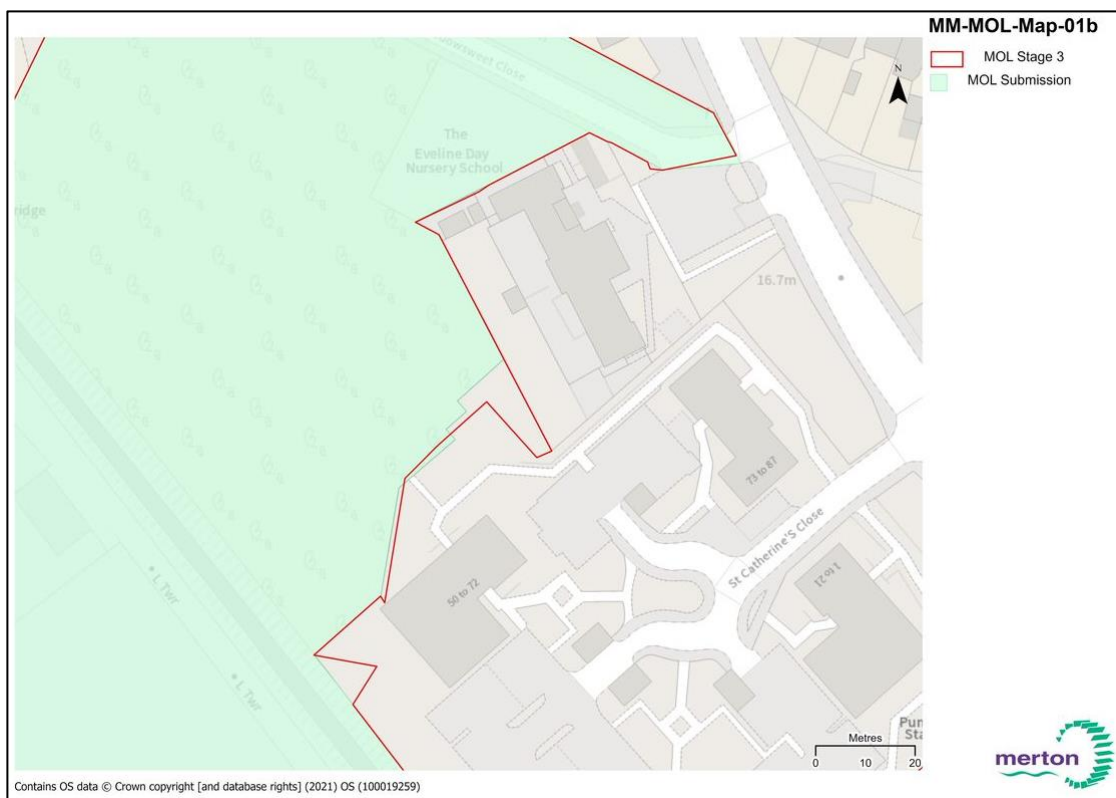
MM-MOL Map-01a - This site was brought to the attention of the council through correspondence from a resident looking to purchase one of the properties and requesting that the MOL status be re-considered as it was inappropriate for the site. Upon review, the MOL is considered to be an anomaly from the previous policy maps and the four residential properties should be removed to correct this error. The modifications ensure that the Local Plan is 'justified'. Refer to map below.

This modification proposes a boundary amendment to the MOL Policies Map, to remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-03). Refer to map below.



MM-MOL Map-01b – A minor amendment to the Lower Morden MOL boundary is proposed to correct a GIS cartographic error from the Regulation 19 (Stage 3) maps where the MOL boundary did not align with the property boundaries. The modifications ensure that the Local Plan is 'justified'. Refer to map below.

Slight boundary amendments around the Eveline Day Nursery SW20 9NA from Lower Morden Metropolitan Open Land (MOL-03).



Q2e. Have proposed boundaries been defined clearly, using physical features that are readily recognisable and likely to be permanent?

Council response:

5.33. NPPF 143 (f) sets out:

“When defining Green Belt boundaries, plans should:

...

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

5.34. Yes, the MOL boundaries for all of the 9 MOL sites in the borough are clearly defined, as illustrated on the Policies Maps (page 6 of [Document 0D2](#)).

5.35. Site assessments of each MOL site, both as part of the Green Infrastructure Study ([Document 15D1](#)) and the further council site reviews ([Document 18D3](#)), included thorough assessments of physical features on site, including any changes to built form and distinct boundary features.

5.36. Physical boundary features can be of varying strengths, with stronger features, such as roads, railway lines, rivers and distinguishable buildings, considered to have more permanence. The boundaries of MOL sites within the Local Plan include a variety of features, including roads, rivers, railway lines, built form,

landscaping, fencing and footpaths. A summary of the physical boundary features for each of the 9 MOL sites in the borough is provided in the table in Appendix 1.

- 5.37. 6 of the 9 MOL sites in the borough directly adjoin the neighbouring boroughs of Sutton, Kingston and Wandsworth. In some of these locations, the physical boundaries are somewhat weaker, as the green and open spaces continue across borough boundaries. However, the borough boundary is a clear and permanent cartographic boundary within the Local Plan Policy maps.
- 5.38. The Plan has been prepared in accordance with national policy para 143 ([Document 0D20](#)), which requires all Green Belt boundaries to be clearly defined, using physical features that are readily recognisable and likely to be permanent.

Q3. Is the list of MOL areas contained in the appendices comprehensive and consistent with any boundary changes proposed in the Plan?

Council response:

- 5.39. Yes, the list of MOL areas contained on page 585 of the Appendix (Document 0D1 Local Plan) is comprehensive and is consistent with the MOL Policies Map (page 6 of Document 0D2). The site numbers and names match the GIS attribute tables in the Policies Map. These names and numbers have been carried over from the current 2014 Merton Sites and Policies Plan and Map, for consistency.
- 5.40. While the Plan proposes 12 minor boundary changes to 7 of the 9 MOL sites (refer to Document 18D3 MOL Policies Map summary of changes and the table of Main Modifications), it does not propose to remove any MOL site in its entirety.
- 5.41. Appendix 2 provides an extract of the Policies Map for MOL (taken from Document 0D2), which includes labels annotating the 9 MOL sites in the borough (taken from Chapter 17 Appendix, page 585 of Document 0D1 Local Plan). This illustrates that the MOL areas are consistent throughout the Plan.
- 5.42. The list of MOL sites in Chapter 17 Appendix of the Plan is comprehensive and consistent with the proposed changes in the Plan, illustrated on the Policies Map.

Q4. Against what criteria should the value of MOL be assessed and was the original review appropriate in this respect?

Council response:

5.43. Yes, the council considers that the MOL reviews carried out for the Local Plan are appropriate, as set out in more detail below.

5.44. Metropolitan Open Land is a London-specific spatial definition in the London Plan. The policy context for MOL is established in the London Plan ([Document 0D32](#)), which identifies that MOL protects and enhances the open environment and improves Londoners' quality of life. The London Plan identifies that MOL is afforded the same status and protection as Green Belt, setting out how planning applications are to be determined for any development proposals on MOL, in accordance with the national policy tests that apply to the Green Belt. In this regard, both Green Belt and MOL are protected from inappropriate development.

5.45. The NPPF Chapter 13 provides policies on the protection of Green Belt land. Paragraph 137 states that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open' the essential characteristics of Green Belts are their openness and their permanence." The Planning Practice Guidance ([Document 0D23](#)) on Green Belts sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt. It also provides information on compensatory improvements, should land be removed from Green Belt. This includes how these might be informed and set out in Local Plans, as well as suggesting how such improvements might be secured. No specific guidance is provided on how Green Belt or MOL studies should be undertaken.

5.46. The London Plan Policy G3 states the following:

B The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area*
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value*
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.*

C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for

including land in MOL set out in Part B.

- 5.47. As the London Plan sets out that MOL is afforded the same status and level of protection as Green Belt, the national policy on Green Belt is of relevance to London's MOL designation. The characteristics of Green Belt, namely openness and permanence are therefore also applicable to MOL. These characteristics are covered in London Plan Policy G3(B) which sets out the four criteria for MOL. The openness and permanence of MOL contribute to the maintenance of the physical structure of London, by making it clearly distinguishable from the built up area ((B)(1)). Openness can also be attributed to the diverse range of functions of MOL, such as leisure, recreation, sport, the arts and cultural activities ((B)(2)), historic, recreational, biodiverse landscapes ((B)(3)) and strategic corridors in green infrastructure networks ((B)(4)). The assessment of MOL undertaken for Merton therefore follows a similar structure to the Green Belt assessment set out in national policy, although considering the more specific London Plan criteria.
- 5.48. There is no specific guidance available on how a MOL review must be conducted and London boroughs have taken a variety of approaches to date. However, an assessment that focuses on the criteria set out in London Plan Policy G3(B) is considered appropriate, as referenced in Policy G3(C). The Green Infrastructure Study (Document 15D1) included an initial review of all the environmental Policy Map designations of sites in the borough, including MOL. As set out on page 349 of the Study, each site was considered against the four assessment criteria, with a high, medium or low contribution attributed for each of the sites. This methodology involved an initial desktop review, using OS maps, aerial photographs and evidence from approved planning application, followed by site visits.
- 5.49. Given that not all MOL sites have the same purpose or function, a standard rating across all sites cannot be used and each must be assessed individually. The MOL review carried out through the Green Infrastructure Study provided a number of recommendations to the council. These recommendations informed part of the assessment for exceptional circumstances. MOL sites were further reviewed by the council, to ensure that any proposed boundary changes were based on site evidence that was as up-to-date as possible. This included evidence including the SHMA (Document 11D8), feedback to the Local Plan consultations and any relevant site-specific circumstances. For consistency, this followed the same process as the initial review.
- 5.50. A further assessment was also undertaken by the council, which looked at the accuracy and robustness of the existing MOL boundaries, using GIS mapping which is significantly more accurate than that used for the previous Policy Maps. This considered the realignment of boundaries where necessary to reflect physical boundaries and features (refer to Appendix 1).
- 5.51. As set out above, the council's MOL review considered the criteria set out in the NPPF, PPG and London Plan, which is appropriate for the Local Plan.

Q5. Does the Plan set out ways in which the loss of any MOL land is offset by compensatory improvements to the environmental quality and accessibility of remaining MOL⁵⁵?

Council response:

5.52. NPPF para 142 sets out the following, with further guidance set out in the NPPG for Green Belts (paragraph 002 of [Document 0D23](#)):

“...Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

5.53. It should be noted that the council does not propose to remove any individual site of MOL in its entirety. As illustrated on the Policies Map ([Document 0D2](#)), there are 9 MOL sites within the borough, totalling over 960 hectares. The 12 MOL boundary amendments proposed through this Plan are minimal, and are not of a strategic nature. They comprise primarily of minor boundary adjustments which are practical, either to correct mapping errors and anomalies, or to reflect the current built form that has come forward through approved planning applications.

5.54. The proposed MOL boundary changes through this Plan result in a di minimis loss (0.11% reduction in MOL overall, refer to Appendix 1 for further details).

5.55. The 12 proposed MOL boundary changes fall into one of three categories:

1. To reflect physical land boundaries and built form that have changed since the 2014 Policies Map was adopted, via approved planning applications that have been implemented and completed. (4 proposed changes).
2. To correct cartographic errors from the 2014 Policies Map and anomalies where the MOL boundary does not reflect the physical site boundary or built form, and the site does clearly not meet the MOL criteria. (6 proposed changes).
3. Where a review of the MOL boundaries and physical features of the site has resulted in the council recommending changes, in accordance with national policy and the London Plan. (2 proposed changes).

5.56. For the 10 proposed amendments which fall under the first two categories, these sites have not been identified for release for development, but rather the proposed alterations are simply to correct mapping errors, or to reflect already approved and completed planning applications. There is little to no impact on the environmental quality and accessibility of the remaining MOL, from these changes, as the proposed mapping alterations are to reflect what is physically on the ground. As such, compensatory improvements are not considered necessary or appropriate in these cases.

⁵⁵ Paragraph 142 of the Framework

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- 5.57. Two of the sites where MOL is proposed to be removed include Site Allocations Mo3 Imperial Sports Ground Tooting and Mitcham Hub and Wi3 All England Lawn Tennis Club. These are considered in more detail below.
- 5.58. Both proposed amendments are of a minor nature in terms of the changes to the MOL boundaries, removing a small portion of MOL in each case. With reference to Appendix 1, the proposed change to Tooting and Mitcham Hub site results in a reduction of 0.29% of the Wandle Valley MOL and the All England Lawn Tennis Club proposed change results in a reduction of 4.76% to Wimbledon Park MOL.
- 5.59. Site allocation Mo3 is for enabling development, to facilitate the intensification of sporting activity on the wider site through long term capital investment. The site allocation already includes requirements for proposals to enhance the nature conservation value of the green corridor (under Design and accessibility guidance) and to provide urban greening on site and ensure that proposals positively enhance accessibility to the Wandle Valley Regional Park (under Infrastructure Requirements).
- 5.60. It should be noted that the signed Section 106 agreement for planning application 19/P4094 also includes a requirement for a management plan to be submitted for a new biodiversity area on the MOL, alongside annual costs for maintenance.
- 5.61. Site allocation Wi3 proposes a “World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake.” It includes requirements for proposals to alleviate the current deficiencies in access to nature and public open space. Part of the site is also designated as a Site of Importance for Nature Conservation (SINC) and proposals would therefore need to be considered in accordance with Policies O15.1 and O15.3 relating to biodiversity and access to nature.
- 5.62. With reference to Strategic Policy O15.1(a) and (h), both of these site allocations promote healthy lifestyles through enabling long term investment in sports, leisure and community uses and improvements to other open spaces and areas of nature conservation.
- 5.63. The Merton Green Infrastructure Study ([Document 15D1](#)) provides an assessment of green and blue infrastructure, biodiversity and open space in the borough, identifying a number of challenges and opportunities for green infrastructure over the plan period. This Study can be used to inform any compensatory improvements that may come forward on sites in the borough, through ecological enhancements, new or enhanced green infrastructure, landscape and visual enhancement and improvements to accessibility to MOL and open spaces.
- 5.64. While these two site allocations already provide some details on environmental and accessibility improvements and green infrastructure requirements, a modification is proposed to each site allocation. These modifications are
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considered necessary to provide clarity on the environmental improvements that are required for each site, to accord with national policy.

Proposed modification:

Site allocation Mo3, “Infrastructure Requirements” (page 199):

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.

Proposed modification:

Site allocation Wi3, new paragraph under “Infrastructure Requirements” (page 284):

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.

Q6. Site Allocation Mo3 relates to an area designated as MOL. Consequently, is the allocation of this site for a mix of uses, including housing, consistent with the Framework and London Plan insofar as the restrictions they impose on ‘inappropriate development’ are concerned⁵⁶?

Council response:

5.65. Site allocation Mo3 is clear that development may be able to come forward on this site, only if it enables the intensification of sporting activity on the wider site, through direct and long-term capital investment. Such details would need to be captured in a Section 106 agreement.

5.66. NPPF 147 sets out:

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

⁵⁶ At paragraph 147ff of the Framework, and in Policy G3 of the London Plan.

5.67. London Plan Policy G3 states:

A Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:

- 1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt*
- 2) boroughs should work with partners to enhance the quality and range of uses of MOL.*

5.68. Taking into consideration the representations made by Tooting and Mitcham Sports & Leisure Ltd throughout the Local Plan consultations, in addition to a number of other supportive representations (including a petition with 63 signatures and 156 letters of support), the site allocation for enabling development will provide an opportunity for enhancements to the quality and range of uses of the Wandle Valley MOL on the wider site.

5.69. A decision notice for planning permission (19/P4094) was issued on 21 December 2021 for (in summary) 77 affordable homes which would fund investment in sports and community uses on the Tooting and Mitcham Hub wider site. This followed a Stage 2 decision letter from the Mayor of London dated 26 April 2021, stating that the Mayor was content for the council to determine the application. The planning application decision was based on these very special circumstances.

5.70. The Mayor of London has also provided his opinion that Merton's Local Plan is in general conformity with the London Plan.

Q7. Given that very special circumstances would likely be needed to justify any residential development proposals at the application stage, is the Site Mo3 policy effective in this regard?

Council response:

5.71. Yes, the site allocation is effective. A planning application has been submitted by the applicant and approved by the council (and referred to and considered by the Mayor of London), which demonstrates that the site can be delivered over the plan period.

5.72. Very special circumstances were demonstrated as part of the [Planning Application 19/P4094](#), which was approved on 20 August 2020 by the Merton [Planning Application Committee](#), with a Section 106 agreement signed on 17 December 2011 and a [Decision Notice](#) issued on 21 December 2021.

5.73. As the application was referable to the Mayor of London, it was considered by the Mayor and a [Stage 2 decision letter](#) was issued on 26 April 2021, which stated that the Mayor was content for the council to determine the planning application. The [Mayor's Stage 2 report](#) sets out the case for very special circumstances:

“Very special circumstances case - conclusion

18 The scheme would cause harm to MOL by virtue of it being inappropriate development. It would also cause harm to the openness and character of the MOL. However, in light of the above benefits which the Council has robustly secured, GLA officers now conclude that the applicant has demonstrated very special circumstances that would clearly outweigh this harm. The proposal therefore complies with London Plan Policy G3 and accords with paragraph 145 of the NPPF.”

5.74. Officers consider that the Site Allocation Mo3 is effective, as it identifies a parcel of land for housing (through enabling development for wider sporting uses) that is clearly deliverable over the plan period. This is evidenced by the approved Planning Application, signed Section 106 agreement and consideration and agreement by the Mayor of London that in this case, very special circumstances do exist to enable the site to come forward for housing.

Q8. Should the MOL boundary be adjusted to address the element of Site Mo3 likely to accommodate housing, and if so, are the exceptional circumstances necessary to justify such an alteration fully evidenced?

Council response:

5.75. Yes, the MOL boundary has been amended to remove site allocation Mo3 from MOL on the Policies Map. This can be seen in [Document 0D2 Policies Map](#), as submitted in December 2021.

5.76. This boundary amendment is necessary to reflect the approved planning application 19/P4094 for this site, decision dated 20 August 2020 by Merton's [Planning Applications Committee](#) with Section 106 agreement signed on 17 December 2021 and a [Decision Notice](#) issued on 21 December 2021.

5.77. The application was also referable to the Mayor of London and was considered by the Mayor. A [Stage 2 report](#) and [Stage 2 decision letter](#) were issued on 26 April 2021, which stated that the Mayor was content for the council to determine the planning application. The GLA's Stage 2 report sets out that the very special circumstances demonstrated by the applicant including the need for enabling development to fund new and improved sports facilities, and provision of 100% affordable housing, clearly outweighed any harm to the site's MOL designation.

5.78. The applicant has continually engaged with the council throughout the Local Plan process, providing supporting information on the future plans of the site. Alongside this, documentation provided as part of planning application 19/P4094 including the viability assessment, community use agreement, affordable housing details and ecological enhancements, have all been considered as part of the evidence to justify exceptional circumstances on this site.

5.79. The council is satisfied that exceptional circumstances exist in this case, which justifies the removal of the MOL from Site Allocation Mo3.

5.80. The council has identified some text in Site Allocation Mo3 (page 200) that also needs to be amended to reflect the MOL boundary change in the Policy Map, as discussed above.

5.81. An additional modification is proposed to correct this, provided below for information.

Proposed Additional Modification:

Impacts a designated open space	Yes, the site is designated as protected open space and Metropolitan Open Land (MOL). Poulter Park, to the south of the site is also designated as MOL in Sutton's Local Plan. The site is within the Wandle Valley Regional Park and the 400m buffer area.
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Q9. Is the allocation of Site Mo3 consistent with the findings of the 'Merton Green Infrastructure, Biodiversity and Open Space Study 2020'⁵⁷ (the Green Infrastructure Study)?

Council response:

5.82. The work undertaken as part of the Green Infrastructure Study (Document 15D1) included a review of the environmental policy map designations for this site; Metropolitan Open Land (MOL), open space, site of importance for nature conservation (SINC) and green corridor.

5.83. The Study provided the council with a number of recommendations for the Policies Maps. In the case of MOL alterations, these recommendations only informed part of the assessment for exceptional circumstances. The sites were subsequently reviewed by the council, to ensure that any proposed boundary changes were based on site evidence that was as up-to-date as possible. Further work by the council included site visits and assessments, consideration of up-to-date evidence and a number of other important elements of the borough's evidence base, including the SHMA (Document 11D8), feedback to the Local Plan consultations and any relevant site-specific circumstances. This enabled a complete and robust assessment of the exceptional circumstances of each parcel of MOL in the borough.

5.84. The final recommendations taken forward in the Policies Maps (Document 0D2) are based on both the Green Infrastructure Study and subsequent council reviews.

⁵⁷ Document 15D1

5.85. In the case of site allocation Mo3, the alteration of the MOL boundary does not reflect the recommendation set out in the Green Infrastructure Study, as the council considered additional evidence which led to the conclusion of exception circumstances. However, a number of other green infrastructure elements identified in the Study are included in the site allocation, including requirements to enhance the nature conservation value of the green corridor, provide urban greening on site and accessibility improvements, given the site's location and relationship with the Wandle Valley Regional Park.

Q10. In light of the considerations set out in the Regulation 19 response of Thames Water, do exceptional circumstances exist which would justify the removal of the MOL designation from the Thames Water Site at Bygrove Road?

Council response:

5.86. The council does not consider that exceptional circumstances exist that would justify the removal of MOL from the Bygrove Road site.

5.87. Thames Water's Reg 19 submission sets out 4 reasons why Thames Water believe the site does not meet the London Plan Policy G3(B) criteria, and therefore should be removed from MOL. These are listed below:

1) The site is not distinguishable from the built-up area. The site is not a green open space and is fully developed with large concrete/brick tanks, buildings and significant areas of hardstanding/parking areas as illustrated on the enclosed photos. The site is industrial in nature and therefore, in our view is not distinguishable from the built-up area and should not be designated as MOL.

2) There is no public access to the Thames Water operational SPS site for health and safety and security reasons. The site incorporates significant built development including a number of sewage pumping station buildings and two sets of large concrete storm tanks with deep water/storm sewage, which would not permit public access. The site does not include any open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.

3) The site is fully developed with sewerage infrastructure and does not contain any features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.

4) The site is not green infrastructure. It is a developed sewerage infrastructure site. Therefore, it does not form part of a strategic corridor, node or a link in the network of green infrastructure and meets none of the above criteria.

The removal of the MOL designation would facilitate any new infill operational buildings in the future which would otherwise have to justify very special circumstances. In our experience, such operational development within the MOL/Green Belt can be delayed by having to demonstrate a very special circumstances case.

5.88. Following on from the [Regulation 19 response](#) received by Thames Water, a meeting was held between LBM and Thames Water representatives on 5th October 2021 to discuss the details of the Thames Water submission.

5.89. The following items were discussed at the meeting, which are of relevance to this question:

a. Use of land for Thames Water operations

- i. In London and the south-east, most Thames Water land is prioritised for operational purposes.
- ii. The current site is used for combined sewerage and flow tanks, storm tanks have been designed for use in extreme storm conditions and there is one borehole on site which Thames Water has permission to use in extreme drought situations.
- iii. Land is reviewed every five years; next review is due in 2025.
- iv. This site is a very active operational site for Thames Water.

b. Thames Water's future plans for the site

- i. There are currently no known intentions for the future of the site, but options may include expansion of operational capacity, storage, or disposal, if deemed surplus.

c. Current MOL designation

- i. Thames Water propose to remove entire site from MOL, in similar circumstances to the Beckton Crossness Sewerage Treatment Works.
- ii. The council's view at the time was that exceptional circumstances do not currently exist to remove the site from MOL, particularly when compared with the Beckton site. The [Beckton site](#) is the largest sewerage treatment works in Europe and has received significant investment for expansion over the last 15 years. It also forms part of a wider Thames Water investment plan. The Byegrove Road site does not currently have any concrete plans for the future and continues as an operational site with no significant changes proposed.

5.90. For the following reasons, the council does not consider that exceptional circumstances exist, to justify the removal of MOL from the entire site:

- The site meets the following MOL criteria set out in the London Plan G3(B):
 - o The site is clearly distinguishable from the surrounding built up area. While there is some built form to the south and south-east of the site, the majority of the site provides for an open landscape which is nestled between mature trees, the River Wandle and the Wandle Meadow Nature Reserve. It is clearly different from the surrounding residential terrace properties and suburban landscape.
 - o The site forms part of a continuous MOL corridor along the River Wandle, as shown in the maps in Appendix 3.
 - o As discussed at the meeting on 5th October 2021, the site photos provided were dated 2018 and 2019. It was agreed that Thames Water would provide some updated site photos to benefit this discussion point.

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- The site forms part of the strategic green corridor that runs along the River Wandle and surrounding areas. This includes parts of the site being designated as Green Corridor, SINC and Open Space.
 - The MOL designation does not restrict Thames Water from using the site for the utilities and operational purposes it is currently being used.
 - The site does not need to have public accessibility in order for it to be designated as MOL.
 - Thames Water has confirmed that while high level proposals for the site have been reviewed internally, no decisions have been made as to future uses/changes for the site.
 - The site does not appear to have changed significantly since the Merton Sites and Policies Plan (SPP) 2014 and no evidence has been provided to show any significant change. Thames Water also requested the site be removed from MOL in the 2014 SPP Examination in Public, however this was not agreed by LBM or the Planning Inspector at the time.

5.91. At the current time, the two parties are not in agreement on the future MOL status of the land at Byegrove Road.

Q11. Is site allocation CW5 justified by the evidence base? Is the presence of MOL recognised adequately?

Council response:

5.92. Yes, the Site Allocation CW5 is justified by the evidence base, as set out below.

The council received [representations](#) from the landowner in January 2018, in response to the Stage 1 Local Plan consultation (call for sites). Further discussions and meetings took place with the landowner in relation to the site, including confidential pre application discussions, held in June 2021. These discussions reviewed the options for the CW5 site and included whole site delivery in line with the proposed site allocation.

5.93. The site is located within the Merton Opportunity Area and Colliers Wood Town Centre ([Document 0D2 Policies Map](#)) and has therefore been identified as suitable for optimising town centre type uses and housing intensification through mixed use development. This is also supported through London Plan Policies SD6 and SD7 ([Document 0D32](#)).

5.94. The MOL, open space, SINC and green corridor boundaries were reviewed as part of the Green Infrastructure Study 2020 ([Document 15D1](#)), in addition to further council site reviews. The site allocation identifies the green infrastructure elements that cross through the site, highlighting opportunities for future improvements, enhancement and protection. The site allocation provides the opportunity for future development to provide enhanced access to the Wandle Valley MOL, through design-led public accessibility improvements.

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- 5.95. For the second part of this question, the presence of MOL is clearly shown on the Policies Map ([Document 0D2 Policies Map](#)) as well as described in the Site Allocation text.
- 5.96. Page 104 of Site Allocation CW5 ([Document 0D1 Local Plan](#)) in the table “The site location” with the heading “Impacts a designated open space” states that “Parts of the site to the south are Metropolitan Open Land”.
- 5.97. The Plan does not propose to modify the MOL boundaries on this site. The Wandle Valley MOL (MOL-03) runs along, and includes, the western edge of the site, following the course of the Pickle Ditch tributary.
- 5.98. A modification is proposed to the Site Allocation under “Impacts a designated open space” (page 104) to amend the description of the parts of the site that are designated as MOL. This is to provide a more accurate description of which parts of the site are MOL, as illustrated in the Policies Map.
- 5.99. A second modification is also proposed to add further text to the “Design and accessibility guidance”. This is to provide a more accurate description of the MOL boundary on site and to make it clear that any future development will need to protect and enhance the MOL and open space on, and adjacent to the site in accordance with the relevant Green Infrastructure policies and national policy.
- 5.100. Both of these modifications are considered necessary to this Site Allocation for clarity and accuracy and to maintain consistency with national policy.

Proposed Modification:

A Main Modification is proposed to the Site Allocation CW5 (page 104):

The site location	
Impacts a designated open space	Yes, the western edge Parts of the site to the south are <u>is</u> Metropolitan Open Land (MOL) and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer.

Proposed Modification:

A Main Modification is proposed to the Site Allocation CW5, to the text under “Design and accessibility guidance” (page 102).

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.

Q12. Is the Council satisfied that the MOL boundaries will not need to be altered at the end of the plan period?

Council response:

- 5.101. Yes, the council is satisfied that MOL boundaries will not need to be altered at the end of the plan period, in accordance with NPPF 143(e) ([Document 0D20](#)). The MOL boundaries in the Plan are clearly defined ([Document 0D2 Policies Map](#)), using physical features that are readily recognisable and are considered to be permanent.
- 5.102. With reference to the Matters on Housing, the council is satisfied that the Plan will bring forward a sufficient supply of housing in the first 5 years, and over the Plan period and there are no identified requirements for further employment land in the Plan. Therefore, there are no strategic reasons to believe that MOL boundaries would need to be altered at the end of the plan period.
- 5.103. The approach set out in the Plan ensures that development will be able to come forward on the proposed Site Allocations and through small sites, without the need to make alterations to the MOL boundaries at the end of the Plan period.

APPENDICES TO MATTER 5

Appendix 1 – Summary of MOL proposed changes.

Appendix 2 – Extract of Policies Map showing MOL sites and names.

Appendix 3 – Further information on Byegrove Road.

APPENDIX 1

Summary of MOL area proposed changes:

MOL-ID	Metropolitan Open Land (MOL)	Area (ha) (2014)	Area (ha) 2021	Difference (ha)	Percentage Change	
1	Cannon Hill	55.25	55.79	0.54	0.98	%
2	Wimbledon Park	52.50	50.00	-2.50	-4.76	%
3	Lower Morden	81.00	80.80	-0.20	-0.25	%
4	Beverley Brook/A3	28.96	28.94	-0.02	-0.07	%
5	Copse Hill	16.10	16.00	-0.10	-0.62	%
12	Wimbledon Common	334.79	334.79	0.00	0.00	%
14	Mitcham Common	217.30	217.30	0.00	0.00	%
16	Morden Park	73.24	74.80	1.56	2.13	%
18	Wandle Valley	103.00	102.70	-0.30	-0.29	%
		962.14	961.12	-1.02	-0.11	%

The table below sets out the following features of all MOL sites in the borough:

1. Name and mapping reference of MOL site.
2. Details of any proposed MOL boundary change (linked with [Document 15D1](#) and [Document 18D3](#)).
3. Any relevant approved Planning Application references and a link to the [Planning Explorer](#).
4. Description of relevant physical features of the MOL identified through site assessments.
5. The area of MOL proposed to be changed and the percentage change this represents.

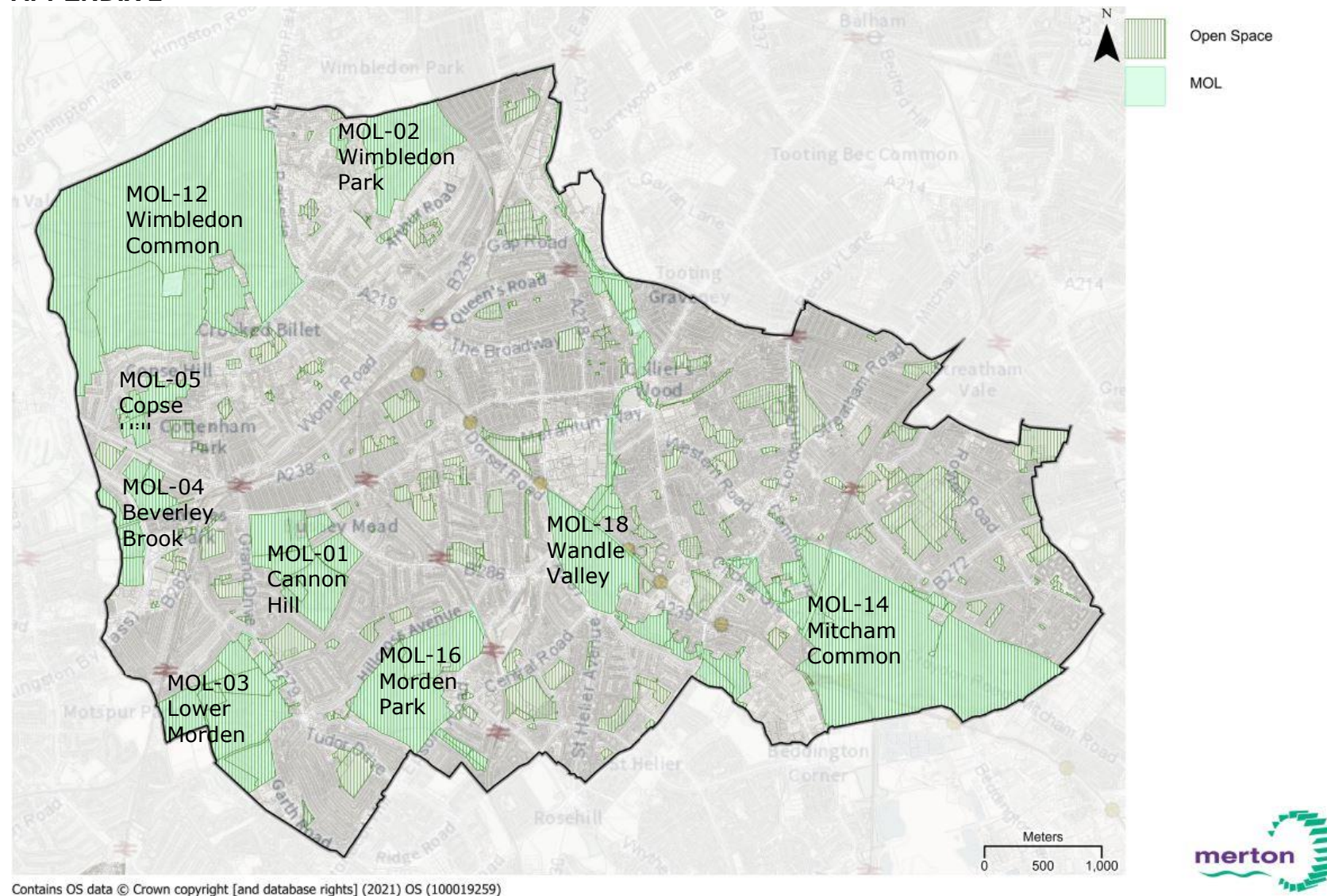
MOL Site	Description of proposed boundary change	Relevant Planning Applications	Relevant physical features of the MOL site	Area of MOL proposed for change (ha)
MOL-01 Cannon Hill	<p>To realign the MOL boundary with the current building line, which has changed through approved planning applications since the 2014 Sites and Policies Map was adopted. This boundary amendment is made to accurately reflect what is built on site, namely the outline of the David Lloyd building along with associated entrances and exits to the outdoor sporting features, fencing to the north and landscaping to the east.</p> <p>The remainder of the site still meets the MOL criteria 1, 2 and 3 from the London Plan and maintains openness as detailed in the NPPF.</p> <p>There would be no harm to the wider MOL function through the removal of this building. In fact, the building itself is deemed to harm the openness of wider the Cannon Hill MOL.</p>	19/P3979	<p>North – Bushey Road.</p> <p>East – The David Lloyd building footprint, fencing and rear of residential properties surrounding Martin Way Allotments and Joseph Hood Recreation Ground.</p> <p>South – Cannon Hill Lane, Parkway and the fenced rear boundaries of residential properties.</p> <p>West – Fenced rear boundaries of residential properties facing Grand Drive to the west.</p>	<p>Proposed addition of 0.54ha MOL.</p> <p>55.25ha (2014).</p> <p>55.79ha (proposed).</p> <p>0.98% change.</p>
MOL-02 Wimbledon Park	<p>To remove a small area on the AELTC site which contains buildings and other specific features that are not considered to contribute to the openness of the Wimbledon Park MOL.</p> <p>The Wimbledon Championships event is of national and international significance, in sporting, economic and cultural circumstances. The Wimbledon Park MOL comprises the entirety of Wimbledon Park, to the east of Church Road, in addition to a small area to the north of the AELTC site. This area includes some practice courts and buildings, but is not connected either visually or physically, to the park, with clear boundaries set by Church Road. The site owners have provided evidence which sets out a long-term vision for The Wimbledon Championships at this location, which includes the</p>	No	<p>North – It should be noted that as Wimbledon Park is located in both Merton and Wandsworth boroughs, the northern boundary of this MOL site in Merton is the borough boundary, which is not a physical boundary.</p> <p>East – fenced landscaping along the District Underground Line.</p> <p>South – Home Park Road and the fenced rear boundaries of residential properties.</p> <p>West – Church Road.</p> <p>The smaller area of Wimbledon Park MOL on the site of the Wimbledon Championships site is bound by the rear fenced boundaries of residential properties to the north and west, operational buildings to the south, and the</p>	<p>Proposed reduction of 2.5ha.</p> <p>52.5ha (2014).</p> <p>50ha (proposed).</p> <p>4.76% change.</p>

	<p>relocation of the Qualifying Event and enhancement of the current site to create a more user friendly experience and to maintain it's position as one of the best sporting events in the World.</p> <p>This part of MOL does not meet the strategic designation criteria and it is considered there would be no harm to the wider MOL function of Wimbledon Park, as the land is clearly separated from Wimbledon Park, visually and physically.</p> <p>The remaining areas of the site, namely Wimbledon Park and the area known as Aorangi Terrace (Murray Mound) still meet MOL criteria 1, 2 and 4 and maintain openness as detailed in the NPPF..</p> <p>The physical boundaries are clear and defensible and capable of enduring beyond the Plan period, as the Wimbledon Championships is a long lasting international sporting event. The council considers that exceptional circumstances exist for this part of the MOL to be removed.</p>		boundary of Aorangi Terrace (also known as Murray Mound) to the east.	
MOL-03 Lower Morden	<p>1. Land off Meadowsweet Close. A minor amendment is proposed to realign the MOL boundary with the current building line which has changed since the 2014 Policies Map was adopted. The site is physically and visually separated, with a nursery building, outdoor play area and site boundary fence offering no connections to the MOL.</p> <p>2. Correction to cartographic boundary error near Eveline Day Nursery & St Catherine's Close. (Main modification reference MM-MOL Map-01b).</p> <p>3. Land off Buttermere Close. A minor boundary amendment is proposed to realign the MOL boundary and remove a residential carpark. The carpark is</p>	<p>1. No</p> <p>2. No</p> <p>3. No</p>	<p>North – fenced residential properties on both sides of Arthur Road, along Marina Avenue, Tennyson Avenue, Westway and Meadowsweet Close.</p> <p>East – Grand Drive, fenced residential properties off St Catherine's Close, Derwent Road, Coniston Close and Buttermere Close, Eveline Day Nursery, St John Fisher Primary School and Lower Morden Lane.</p> <p>South – Garth Road, landscaped edge of Morden and Sutton Joint Cemetery abutting built form of adjoining industrial area.</p> <p>West – the western boundary primarily follows the pedestrian walkways which provide a link from Trafalgar Avenue, along the rear of the industrial area, cemetery and equestrian</p>	<p>Proposed reduction of 0.2ha.</p> <p>81ha (2014).</p> <p>80.8ha (proposed, including MM-MOL Map-01a and MM-MOL Map-01b).</p> <p>0.25% change.</p>

	<p>ancillary to the adjoining residential units and is not linked to the cemetery. It does not contribute to the openness of the Lower Morden MOL. This appears to be an error in the 2014 Policies Map.</p> <p>4. Proposed boundary amendments to remove four houses next to the cemetery from Lower Morden MOL. This is an error from the 2014 Policies Map. While the houses are directly adjacent to the cemetery, they are freehold properties separately owned and are not related to the cemetery or surrounding MOL (Main modification reference MM-MOL Map-01a).</p>	4. No	<p>centre, up and around Sir Joseph Hood Memorial Playing Fields, along the Beverley Brook.</p> <p>It should be noted that this also forms the borough boundary with London Borough of Sutton.</p>	
MOL-04 Beverley Brook / A3	<p>This site appears to have been included as MOL in error in the 2014 Sites and Policies Plan.</p> <p>It does not meet the MOL criteria set out in the London Plan and is therefore recommended to be removed. The site is privately owned, is physically separated from the adjoining MOL, does not offer sports, leisure, recreation, art or cultural activities and does not contain features or landscapes of a national or metropolitan value.</p>	No	<p>North – Fenced residential properties off Somerset Avenue, Camberley Avenue, Coombe Lane, Coombe Gardens and Beverley Way.</p> <p>East – The A3, fenced residential properties off Aboyne Drive and Taunton Avenue.</p> <p>South – The built form of the adjoining industrial area and the landscaped edge of the overground railway line.</p> <p>West – The A3 and the Beverley Brook, which also forms the borough boundary with LB Kingston.</p>	<p>Proposed reduction of 0.02ha.</p> <p>28.96ha (2014).</p> <p>28.94ha (proposed).</p> <p>0.07% change.</p>
MOL-05 Copse Hill	<p>Boundary changes are proposed to reflect the approved planning applications and new built form for this site. The built form of the new developments at Atkinson Morley and the former Wilson Hospital sites set the physical boundaries of the northern edge of this MOL.</p>	13/P2722 16/P4853	<p>North – Built form at Atkinson Morley and the former Wilson Hospital.</p> <p>East – Fenced residential properties off Heights Close, Cottenham Place and Prospect Place.</p> <p>South – Cottenham Park Road.</p> <p>West – Primary School and fenced residential properties off Melville Avenue and Burdett Avenue.</p>	<p>Proposed reduction of 0.1ha.</p> <p>16.1ha (2014).</p> <p>16ha (proposed).</p> <p>0.62% change.</p>
MOL-12 Wimbledon Common	No changes proposed.	N/A	<p>North – Borough boundary with LB Wandsworth.</p> <p>East – The A219.</p>	No change.

			South – Southside Common and fenced residential properties. West – The A3.	Total area is 334.79ha
MOL-14 Mitcham Common	No changes proposed.	N/A	North – Commonsides East. East – Borough boundary with LB Croydon. South – Borough boundary with LB Sutton. West – Railway and Tram lines, A239.	No change. Total area is 217.3ha.
MOL-16 Morden Park	Boundary amendment to the former and new Morden Leisure Centre site and minor extension to the MOL boundary to include the adjoining carpark, play area and other ancillary features to the park. This proposed amendment is to reflect the location of the new Morden Leisure Centre, approved with a MOL land swap through a planning application and ensure all areas of Morden Park that meet the MOL criteria are included for protection. The former leisure centre building has been demolished and this area has now been restored for nature conservation purposes.	16/P0882	North – Railway line and rear fenced residential properties off Hillcross Avenue. East – A24. South – Lower Morden Lane. West – Residential properties off Hillcross Avenue, Lower Morden Garden Centre.	Proposed addition of 1.56ha. 73.24ha (2014). 74.8ha (proposed). 2.13% change.
MOL-18 Wandle Valley	1. 222 High Street, Colliers Wood. The removal of this retail property and adjacent car park is proposed and necessary to correct an error in the 2014 MOL boundary. This site does not form part of the Wandle Valley MOL corridor and is an anomaly that needs to be corrected. The built form and ancillary carpark are clearly separated from the park and do not contribute to the openness of the MOL. 2. Tooting and Mitcham Hub. As demonstrated through the approved planning application, this site meets very special circumstances and MOL is to be removed as per the granted permission and S106 agreement. The approved residential development will not contribute to the openness of the MOL and will act as a physical barrier to the surrounding area.	1. No 2. 19/P4094	North – Borough boundary with LB Wandsworth. South – Borough boundary with LB Sutton. East and West – The MOL follows the River Wandle and broadly encompasses the Wandle Valley Regional Park sites, which stretch across a thin corridor from north to south of the borough.	Proposed reduction of 0.3ha. 103ha (2014). 102.7ha (proposed). 0.29% change.

APPENDIX 2



APPENDIX 3

LB Merton's 2014 Policy Maps, illustrating the location of the Byegrove Road site and area Thames Water are proposing to remove from MOL

The maps below illustrate the Thames Water Byegrove Road site in red. They also show the wider and continuous Wandle Valley MOL boundary, which runs through the borough from north the south, largely along the River Wandle.

