



GREEN INFRASTRUCTURE, BIODIVERSITY AND OPEN SPACE STUDY

LONDON BOROUGH OF MERTON

DESIGNATED SITES BOUNDARY REVIEW TECHNICAL REPORT

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1.0 Introduction

- 1.1 This technical report has been produced by The Environment Partnership (TEP) Ltd on behalf of the London Borough of Merton (LBM) to provide details of the designation boundary reviews for both open space and biodiversity sites within the Borough.
- 1.2 Boundary reviews of land currently designated in the Merton Core Strategy (2011) and Sites and Policies Plan (2014) as Open Space, Metropolitan Open Land, Sites of Importance for Nature Conservation and Green Corridors were undertaken borough wide. Many of these land parcels were identified as a result of planning applications and decisions which have impacted or may impact the designation boundaries.
- 1.3 The method and criteria for the open space and biodiversity boundary reviews are provided in Chapter 2 of this report and cover the following:

Open Space Sites

- Open Space (OS)
- Metropolitan Open Land (MOL)

Biodiversity Sites

- Site of Importance for Nature Conservation (SINC)
- Green Corridor (GC)

- 1.4 The outcomes of the boundary reviews are provided in Chapter 3.
- 1.5 Survey Points are shown on the following GIS maps in Appendix B:
 - G7118.063 Metropolitan Open Land (MOL) Boundary Review
 - G7118.064 Open Space Boundary Review
 - G7118.062 Sites of Importance for Nature Conservation (SINC) Boundary Review
 - G7118.065 Green Corridor Boundary Review

Purpose and Scope

- 1.6 The Designated Sites Boundary Review Technical Report forms part of a set of Technical Reports which will provide an evidence base for the Merton Local Plan, and inform the overall Merton Green Infrastructure, Biodiversity and Open Space Study as shown in Figure 1.

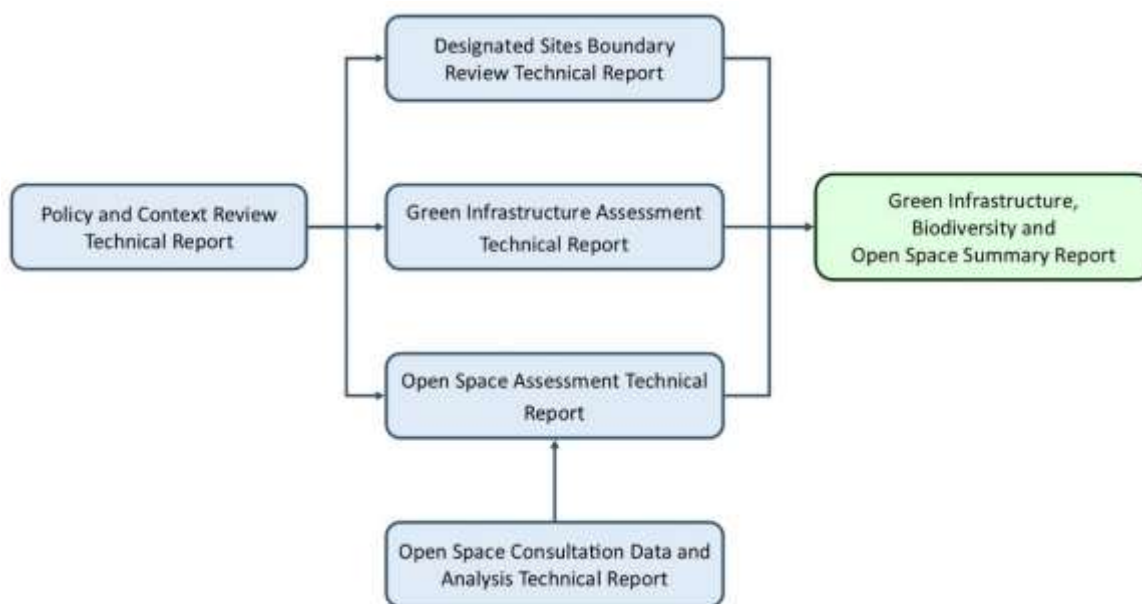


Figure 1: Report Structure for Green Infrastructure, Biodiversity and Open Space Study

2.0 Method

Open Space

Definitions

- 2.1 The definition of Open Space below is taken from National Planning Policy Framework (NPPF) (2019¹):

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

- 2.2 The London Plan (2016²) definition is:

All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

- 2.3 The draft new London Plan (2018³) definition remains the same as the London Plan (2016).

- 2.4 Greenspace Information for Greater London (GiGL⁴) manages a London-wide database of open spaces. This includes GIS files of open space sites and facilities as well as information such as ownership, whether the site is publicly accessible, and details of designations that apply to the site. GiGL defines open space as follows:

Open space is defined as undeveloped land which has an amenity value, or has potential for an amenity value. The value could be visual, derive from a site's historical or cultural interest or from the enjoyment of facilities which it provides. It includes both public and private spaces, but excludes private gardens.

- 2.5 Merton's current adopted Sites and Policies Plan (2014⁵) defines Open Space as:

All the land that is predominantly undeveloped, other than by buildings or structures that are ancillary to the open space use, and bodies of water that are indicated as open space on Merton's Policies Map. The definition covers a broad range of types of open space within Merton, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan>

³ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0>

⁴ <http://www.gigl.org.uk/open-spaces/>

⁵ <https://www2.merton.gov.uk/environment/planning/planningpolicy/localplan/sitesandpoliciesplan.htm>

2.6 The Part 1 Sites and Policies Plan is supplemented by Part 2 Index of Sites and Maps. These underwent Stage 3 consultation between January and February 2013⁶. The criteria used to apply the Open Space designation, including Inclusions and Exclusions has been reviewed and is listed below for information. The definitions used in the Sites and Policies Plan were taken from the NPPF (2012⁷) and London Plan (2011⁸) but are the same as those above for the NPPF (2019) and London Plan (2016).

2.7 Inclusions:

- Inclusion 1 - All open spaces within the borough such as parks, commons, play grounds, sports fields (including MUGAs and bowling greens), allotments, cemeteries and churchyards, urban farms and woods that are not specifically excluded below.
- Inclusion 2 - Buildings within open spaces that are ancillary to the use of the open space (e.g. changing rooms).
- Inclusion 3 - Large soft landscaped open spaces within school grounds (e.g. playing fields) and (hard) demarcated playing pitches (e.g. netball courts), including ancillary school buildings or hard standing (e.g. car parks) not in the immediate vicinity of the main school building.

2.8 Exclusions:

- Exclusion 1- Main school buildings. (These parts of the site are predominantly developed and the school use is not ancillary to open space.)
- Exclusion 2 - The hard standing and ancillary buildings surrounding the main school buildings. (These areas form part of the site which is predominantly developed, where the non-ancillary use is most intense.)
- Exclusion 3 - Private residential gardens. (The primary use of these properties is residential and they would therefore not conform to the London Plan definition. Furthermore, due to the extensive amount of development that is allowed on residential gardens without the requirement for planning permission, draft policy DM O1 Open Space will not be deliverable in these areas. It is also worth noting that residential back gardens are explicitly removed from the definition of 'Previously Developed Land' in the NPPF (2012), and in accordance with paragraph 53 of the NPPF (2012), Core Strategy Policy CS 13(e) resists development on them)⁹.
- Exclusion 4 - Soft landscaped areas associated with blocks of flats or housing estates, which have a sense of enclosure and privacy. (These sites are usually predominantly developed with various areas of soft

⁶https://www2.merton.gov.uk/environment/planning/planningpolicy/localplan/sitesandpoliciesplan/sites_policies_stages3.htm

⁷ <https://webarchive.nationalarchives.gov.uk/20180608213715/https://www.gov.uk/guidance/national-planning-policy-framework>

⁸ <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2011>

⁹ The Court of Appeal decision of *Dartford Borough Council v Secretary of State for Communities And Local Government & Anor* [2017] EWCA Civ 141 found that the term 'previously developed land' as defined by the glossary forming part of the National Planning Policy Framework (NPPF) includes private residential gardens in an area that is not built-up. The London Borough of Merton is assumed to comprise 'built-up' areas and so this change is not relevant.

landscaped amenity space to serve the occupants. These areas of soft landscaping would not conform to the London Plan definition.)

- Exclusion 5 - Public and private highways as listed on the Streets Register (which usually include the pavements) and open areas that are part of, or essential to the prevailing character of the area (such as parcels of land within St Helier Estate). (Most works in or adjacent to a highway do not require planning permission and therefore draft policy DM O1 Open Space will not be deliverable in these areas. In some neighbourhoods there are small open spaces that are integral to the design of the original townscape layout and although they might appear to be part of the highway, they are not on the Streets Register. These open spaces are protected from development by means of the design policies and do not warrant safeguarding by means of designation on the Policies Map.)
- Exclusion 6 - Land along operational rail reserves (with restricted public accessibility or limited visual amenity value). (These areas are usually predominantly developed with narrow strips of vegetation on either side and would therefore not conform to the London Plan definition. Although they might provide some “visual amenity”, due to the restricted access they would not “offer important opportunities for sport and recreation”. The majority of these areas are however protected for their nature conservation value as Green Corridors.)
- Exclusion 7 - Very small areas (typically less than a quarter of an acre/0.1ha) of green open space which, as a result of a qualitative assessment, are considered to have too restrictive access or are of a size or shape which result in them having a very limited functional use as open space and therefore do not warrant safeguarding by means of designation on the Policies Map. (Although these areas might provide some “visual amenity”, they would not also “offer important opportunities for sport and recreation”. Officers have judged these open spaces to have limited public value and they therefore do not warrant safeguarding by means of designation on the Policies Map.)
- Exclusion 8 - Buildings, and their adjoining land, on the edge of open space of which the primary use is not ancillary to the use of open space. (These sites would not conform to the London Plan definition).

2.9 The Merton definition, and each of the existing Inclusions and Exclusions criteria is discussed below and has been reviewed and updated in line with the NPPF (2019), London Plan (2016), draft new London Plan (2018), and GiGL definitions.

Review of Merton's Open Space Definition in Light of NPPF (2019)

2.10 There are differences between the definitions of open space in planning documents as set out at the start of this Chapter. The NPPF definition of open space has some ambiguity as to whether the criterion that open space needs to '*offer important opportunities for sport and recreation*' or whether that applies to areas of water only. However Planning Practice Guidance (PPG)¹⁰ gives further clarification on open space.

¹⁰ Paragraph: 001 Reference ID: 37-001-20140306 Accessed 10/01/19

- 2.11 It states that open space includes all open space of public value. That is helpful as it does not refer to the need for open space to *'offer important opportunities for sport and recreation'*. This interpretation is reinforced by PPG explaining that open space can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It is clear that not all of these examples, such as open areas within a development and linear corridors, will offer important opportunities for sport and recreation.
- 2.12 PPG confirms that open space can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development. These are not criteria which must apply but can be read as examples of how public value may be provided by open space.
- 2.13 PPG on open space refers to NPPF paragraph 96, headed *'Open space and recreation'* which states that *'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.'* It also refers to NPPF paragraph 171 under the heading *'Conserving and enhancing the natural environment'*. Paragraph 171 explains that plans should, amongst other things, *'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'*.
- 2.14 The guidance on open space also refers to NPPF paragraphs 7-9 which set out the basis of sustainable development including the economic, social and environmental objectives. This strongly indicates that open space has a role in each of these objectives, rather than a narrowly prescribed function (such as solely sport and recreation).
- 2.15 PPG on open space sets out three further references to related policy in the NPPF in addition to those discussed above. The first is to NPPF paragraph 92 under the heading *'Promoting healthy and safe communities'* and advises
- 'To provide the social recreational and cultural facilities and services that the community needs, planning policies and decisions should:*
- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;'*
- 2.16 Further sub-paragraphs of NPPF paragraph 92 refer to guarding against loss of valued facilities; ensuring facilities are able to develop and modernise and are retained for community benefit; and ensuing an integrated approach to the location of housing, economic uses and community facilities.

- 2.17 PPG also references NPPF paragraphs 20-23 which are under the heading '*Strategic policies*'. This aspect of guidance refers to the need for strategic policies that are clearly identified, set out the pattern, scale and quality of development, and anticipate long-term requirements over a minimum period of 15 years. The paragraphs refer to land use designations identified on a policies map and paragraph 20 refers at sub-paragraph d) to making sufficient provision for, amongst other things, '*conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation*'.
- 2.18 The third additional aspect of policy related to open space which is flagged in PPG is NPPF paragraph 26 regarding '*Maintaining effective cooperation*'. Paragraph 26 notes that cooperation is integral to good strategy and joint working should help determine where infrastructure is needed and where development needs can be met. This advice is not directly relevant to characteristics of open space, but can be applied to various policy aspects.
- 2.19 Taking the NPPF definition of open space read in conjunction with advice in PPG, it is clear that open space is taken to be open land (or water) which has public value and that value may be derived from characteristics or contributions it makes other than important opportunities for sport and recreation.
- 2.20 Merton's definition of open space is qualified by the phrase that it applies to land or bodies of water indicated as open space on the Policies Map. The discussion below considers the criteria used to identify open space designations, described below, and whether they are consistent with the aspects of public value described in the NPPF as clarified by PPG.
- 2.21 The second sentence of the Merton definition of open space identifies that land or water which may be designated as open space may be in public or private ownership and may have unrestricted, limited or restricted public access. NPPF and PPG does not set out that open space should be in any particular form of ownership or tenure or that any particular form of public access applies. The clarification that open space may be in different forms of tenure and with different access is helpful in clarifying that the designation is not solely related to land in public ownership and with public access.

Review of Merton's Inclusions

Inclusion 1 - Types of Open Space

- 2.22 This point provides more detail on the '*broad range of types of open space within Merton*'. It includes some of the previous PPG17¹¹ categories and London Survey Method sub-categories (as cited on GiGL's Open Space Categories page¹²).

¹¹

<https://webarchive.nationalarchives.gov.uk/20120920011634/http://www.communities.gov.uk/archived/publications/planningandbuilding/planningpolicyguidance17>

¹² <https://www.gigl.org.uk/open-spaces/open-space-categories/>

- 2.23 The types of land use listed are those which would be anticipated to have public value as advised in the NPPF and PPG. A challenge could be made that including each of these land uses as a matter of course without evaluating public value risks inclusion of land which should not be designated open space although it is difficult to envisage that any of the land uses would not contribute some public value such as habitat or visual amenity.

Inclusion 2 - Ancillary Buildings

- 2.24 This point reiterates that open space designation includes *'land that is predominantly undeveloped, other than by buildings or structures that are ancillary to the open space use'* from the Merton definition, and mirrors the London Plan definition.

- 2.25 This is useful clarification and there are no suggested changes to the inclusion text.

Inclusion 3 - Large Soft Landscaped Open Spaces within School Grounds

- 2.26 School grounds are classified as open space by the previous PPG17 categories and London Survey Method sub-categories (as cited on GiGL's Open Space Categories page). The GiGL 'Educational' subcategory falls under the 'Amenity' category, and is described as *'school or college ground and field study centres where school education is the primary function'*.

- 2.27 It is recommended that this inclusion remains, with the additional point that *'ancillary school buildings or hard standing (e.g. car parks) not in the immediate vicinity of the main school building'* should only include land on which the buildings or hardstanding are ancillary to the open space use (e.g. changing rooms, car parking for users of the playing fields), to be consistent with the Merton and London Plan open space definition.

- 2.28 Further information from Sport England's 'Playing Fields Policy and Guidance'¹³ and Government guidance on 'School land and property: protection, transfer and disposal'¹⁴ which references the non-statutory advice document 'Disposal or change of use of playing field and school land' (DfE, May 2015), has been provided to the Future Merton team as supporting information.

- 2.29 Open space comprising land used as recreational space by a school often has wider public benefits including visual amenity and habitat value and it may form part of a linear corridor and green infrastructure.

¹³ <https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>

¹⁴ <https://www.gov.uk/guidance/school-land-and-property-protection-transfer-and-disposal>

- 2.30 A query was raised during the study as to whether the definition of open space should be amended to assist development management decisions where there is a need to provide school places to meet local educational needs assessment and school expansion onto adjacent land is the most appropriate option. Addressing this issue is a matter of ensuring relevant policy and its application addresses the planning balance in such instances. There is not a need to specifically identify open space which comprises land used by a school in the definition as a 'sub-category' as this is readily discerned and the facts that lead to its identification may change over time. The application of policy in these instances is not a matter that can be assisted by the changes to the definition of open space.

Review of Merton's Exclusions

Exclusion 1 - Main School Buildings

- 2.31 School buildings cannot be classed as undeveloped land, and are not ancillary to the open space use and should continue to be excluded.

Exclusion 2 - School Ancillary Buildings

- 2.32 School ancillary buildings and hard standing (unless ancillary to the open space use e.g. changing rooms, or hard standing for sports use e.g. netball courts, which are covered by the Inclusion 2), cannot be classed as undeveloped land and should continue to be excluded.

Exclusion 3 - Private Residential Gardens

- 2.33 The Merton Site and Policies Plan highlights the value gardens have for biodiversity and amenity. In the draft new London Plan (2018) the definition for Green Corridor includes 'extensive areas of private gardens'. These points demonstrate that there is some public value represented by private residential gardens.
- 2.34 The exclusion states that private residential gardens do not comply with the 2011 London Plan definition, which remains unchanged in the 2016 and 2018 versions. However the London Plan definition does not state that private residential gardens are excluded; this is stated in the GiGL definition. Although it can be anticipated that the majority of private residential gardens are less than 0.1ha (see Exclusion 7) and also that many do not contribute public value, the Merton definition explains that tenure and access are not criteria for designation.
- 2.35 The exclusion also refers to residential back gardens in built-up areas being excluded from the definition of 'Previously Developed Land' in the NPPF (2012). This is consistent with NPPF (2018). (Footnote 9 explains that gardens outside of built-up areas comprise Previously Developed Land.) It is not clear that this is relevant to definition of open space or of the exclusion.
- 2.36 Adopted policy DM 01 aims to protect and enhance open space and the notes on the exclusion of private gardens set out that permitted development rights allow some forms of development in gardens (unless the rights have been removed, for example the property is listed or in a Conservation Area or an Article 4 Direction applies).

- 2.37 Given the relatively low public access from private residential gardens, the autonomy of each individual garden owner and the permitted development rights that apply within the curtilage of a dwelling house, it seems proportionate to exclude private residential gardens from the definition of designated open space. When adopted, the equivalent policy to DM01 Open Space in new Merton Local Plan should be referenced in the notes on the exclusion.

Exclusion 4 - Blocks of Flats and Housing Estates

- 2.38 This states that soft landscape areas associated with blocks of flats or housing estates, which have a sense of enclosure and privacy do not comply with the London Plan definition. The discussion of this exclusion refers to the 2011 London Plan definition, which remains unchanged in the 2016 and 2018 versions. However the London Plan definition does not state that these areas are excluded and the Merton definition of open space explains that land which has limited or restricted access is not excluded solely due to these attributes. As for private gardens, there will be many areas of land which are too small to be designated or which may not contribute an aspect of public value, particularly because of their enclosure although they may be valuable for the residents.
- 2.39 This exclusion effectively offers an explanation that where land associated with blocks of flats or in housing estates offers little public value because of its enclosure (although they may be valuable for local residents), it will be excluded from being designated as open space. That is a useful clarification and the exclusion can remain.
- 2.40 In discussions during this study, the role of open space and its protection during redevelopment of housing estates was raised with a query if the definition of open space should acknowledge redevelopment where part of planned regeneration is acceptable. This is similar to the query raised regarding possible development of schools on open space comprising school land (see above). Merton Council's adopted Estates Local Plan (2018) covers three existing housing estates within Merton: Eastfields; High Path, and Ravensbury. The Estates Plan is a tool to shape and manage the redevelopment process of these three estates, and includes more detailed policies on the provision of open space in terms of losses and gains.
- 2.41 As for school land which is open space, there is not a need to specifically identify open space which comprises land in a housing estate in the definition as a 'sub-category' as this is readily discerned and the facts that lead to its identification may change over time. The application of policy in these instances is not a matter that can be assisted by the changes to the definition of open space.

Exclusion 5 - Public and Private Highways

- 2.42 Verges and roadside planting may be included in the highway and can give public value and also form important components of green infrastructure. However there are extensive permitted development rights that apply to highways and which could be used irrespective of protection of open spaces by planning policy.

- 2.43 Public and Private Highways as listed on the Streets Register should continue to be excluded. When adopted, the equivalent policy to DM01 Open Space in new Merton Local Plan should be referenced in the exclusion.

Exclusion 6 - Operational Rail Reserves

- 2.44 This point states that land along operational rail reserves does not comply with the London Plan definition. As with previous statements, this appears incorrect as the 2011 London Plan definition, which remains unchanged in the 2016 and 2018 versions does not state that these areas are excluded. The Merton definition of open space confirms that tenure and access to land are not relevant when considering if it is open space and the notes on this Exclusion acknowledge that In fact open space which has restricted access is included. The reference to providing some “visual amenity”, but due to the restricted access they would not “offer important opportunities for sport and recreation” is compliant with the NPPF definition and therefore justifies their continued exclusion.

Exclusion 7 - Very Small Areas

- 2.45 This exclusion is an acknowledgement that there needs to be proportionality in the application of designations of open space. Areas of land of less than 0.1ha may contribute to public value, notably in the street scene and where visible from public areas. Consideration of adverse effects from development in such instances will be addressed in relevant planning policy, such as taking account of local character and townscape. This exclusion is appropriate.

Exclusion 8 - Edge of Open Space/Non-Ancillary Use Buildings

- 2.46 Buildings, and their adjoining land, on the edge of open space cannot be classed as undeveloped land, and are not ancillary to the open space use. They should continue to be excluded.

Metropolitan Open Land (MOL)

- 2.47 The London Plan (2016) definition of Metropolitan Open Land is:

Strategic open land within the urban area that contributes to the structure of London.

- 2.48 Policy 7.17 of the London Plan (2016) states:

To designate land as MOL, boroughs need to establish that the land meets at least one of the following criteria:

It contributes to the physical structure of London by being clearly distinguishable from the built up area;

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;

It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;

It forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

- 2.49 The definition for Green Chain in the London Plan (2016) is:

These are areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes.

- 2.50 The draft new London Plan (2018) definition of MOL is:

Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

- 2.51 Policy G3 of the draft new London Plan (2018) states:

'Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:

It contributes to the physical structure of London by being clearly distinguishable from the built-up area;

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;

It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;

It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.'

- 2.52 In the draft new London Plan the fourth criterion removes 'Green Chain' (there is no mention or definition elsewhere in the Plan either) and replaces with 'strategic corridor', for which no definition is provided. 'Network of green infrastructure' is consistent across both London Plan criteria.

- 2.53 The draft new London Plan (2018) definition of Green infrastructure is:

Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.

- 2.54 Both the adopted London Plan (2016) criteria (including reference to 'Green Chains'), and the emerging draft new London Plan criteria, have been considered for the designated sites boundary review exercise.

- 2.55 The assessment of MOL sites within the borough considers the relative extent to which the site fulfils the purposes of MOL as set out in the London Plan and draft new London Plan.

- 2.56 The assessment has been used alongside general commentary of each site, to summarise the extent to which each parcel of land fulfils the MOL purpose. The assessments are based on professional judgement of the overall contribution and are not scored or weighted. The assessment criteria is set out in Appendix A.

Sites of Importance for Nature Conservation (SINC)

- 2.57 The London Plan (2016) does not have a definition of SINC, but the draft new London Plan (2018) definition of SINC is:

Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs, SINC are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINC are set out in Appendix 5 of the Mayor's London Environment Strategy.

- 2.58 The Advice Note: Process for selecting and confirming Sites of Importance for Nature Conservation (SINC) in Greater London (LWSB, updated March 2013¹⁵) is referenced in Appendix 5 of the Mayor's London Environment Strategy (2018¹⁶). This states that *'It is the responsibility of London Boroughs to obtain and maintain up to date data on all land of nature conservation interest that is located within the administrative borough boundary, irrespective of land ownership'*.
- 2.59 The Mayor's Biodiversity Strategy (A 1.2.13) defines Areas of Deficiency (AoD) as built-up areas more than one kilometre actual walking distance from an accessible Metropolitan or Borough Site of Importance for Nature Conservation (SINC). SINC are graded in four tiers; Sites of Metropolitan Importance, Sites of Borough Importance (Borough Grade 1 and Borough Grade 2) and Sites of Local Importance. One kilometre distance is measured along actual walking routes via roads, bridges and paths from modelled SINC access points.
- 2.60 Appendix 1 of: Process for selecting and confirming Sites of Importance for Nature Conservation (SINC) in Greater London is the process used in the previous assessment of SINC throughout the borough of Merton and is still considered as the most relevant way to select and assess SINC. Reference to the application of criteria can be found in Stage 3 (Part 2) consultation on Potential Sites and Draft Policies Maps between January and February 2013¹⁷. SINC are criteria based designations. Some criteria are assessed using desk-based techniques and some are assessed on the basis of field survey.

¹⁵ https://www.london.gov.uk/sites/default/files/sinc_selection_process_-_update_march_2013.pdf

¹⁶ <https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>

¹⁷

- 2.61 The boundary review exercise undertaken by TEP is on the basis of sites meeting field survey criteria, as listed under the Survey Method heading below. Desk based assessments of criteria including size, species data, and geodiversity have not been updated as part of the boundary reviews.
- 2.62 There are three tiers of SINCs, which are chosen on the basis of their importance to a particular defined geographic area. This use of defined areas is an attempt, not only to protect the best sites in London, but also to provide each part of London with a nearby site, so that people are able to have access to enjoy nature.
- 2.63 **Sites of Metropolitan Importance** - Those sites which contain the best examples of London's habitats, sites which contain particularly rare species, rare assemblages of species or important populations of species, or sites which are of particular significance within otherwise heavily built-up areas of London.
- 2.64 **Sites of Borough Importance** - These are sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough. As with Metropolitan sites, while protection is important, management of borough sites should usually allow and encourage their enjoyment by people and their use for education.
- 2.65 **Sites of Local Importance** - A Site of Local Importance is one which is, or may be, of particular value to people nearby (such as residents or schools). These sites may already be used for nature study or be run by management committees mainly composed of local people. Where a Site of Metropolitan or Borough Importance may be so enjoyed it acts as a Local site, but further sites are given this designation in recognition of their role. This local importance means that these sites also deserve protection in planning.
- 2.66 **Other Wildlife Habitat** - If an area of wildlife habitat is not designated as being of Metropolitan, Borough or Local Importance this does not imply that it has little or no value. The needs of wildlife and the value of natural vegetation should be considered throughout the planning process. It is particularly important that opportunities be taken to preserve, enhance or create areas of natural water and vegetation within heavily built-up areas, and to provide access locally.

Survey Method

- 2.67 GiGL is the official custodian of information on London's more than 1,500 sites of importance for nature conservation (SINCs) – their citations and boundary information¹⁸.
- 2.68 The SINC Citations have been used to understand the site specific designation information associated with each SINC site boundary being reviewed, and to inform any recommendations for necessary boundary changes.
- 2.69 The following criteria were used during the field study carried out by TEP in August 2018.

¹⁸ <https://www.gigl.org.uk/designated-sites/non-statutory-sincs/>

- **Habitat richness** - Protecting a site with a rich selection of habitat types not only conserves those habitats, but also the wide range of organisms that live within them and the species that require more than one habitat type for their survival. Rich sites also afford more opportunities for enjoyment and educational use.
- **Ancient character** - Some sites have valuable ecological characteristics derived from long periods of traditional management, or even a continuity in time to the woodlands and wetlands which occupied the London area before agriculture. Ancient woodlands, old parkland trees and traditionally managed grasslands tend to have typical species that are rare elsewhere. These habitats deserve protection also because of the ease with which they are damaged by changes in management, ploughing, fertiliser and herbicide treatment.
- **Typical Urban Character** - Features such as canals, abandoned wharves, walls, bridges, tombstones and railway sidings colonised by nature often have a juxtaposition of artificial and wild features. Some of these habitats are particularly rich in species and have rare species and communities of species. Their substrates may have a particular physical and chemical nature which allows species to thrive that are rare elsewhere. They may also have particular visual qualities. Such areas are often useful for the study of colonisation and ecological succession.
- **Cultural or historic character** - Sites such as historic gardens with semi-wild areas, garden suburbs, churchyards and Victorian cemeteries which have reverted to the wild may have a unique blend of cultural and natural history.
- **Use** - The importance of a site can include its established usage (eg for education, research, or quiet enjoyment of nature).
- **Potential** - Where a site can be enhanced given modest changes in management practices this gives it value. Opportunity exists where a site is likely to become available for nature conservation use, or where there is considerable local enthusiasm about it, or where a voluntary group is willing to use and manage it. Potential in this context can be for habitat enhancement through management, for educational or nature conservation amenity use. Where such potential could remedy a deficiency, or is readily capitalised, it is considered important.
- **Aesthetic appeal** - This factor is the most difficult to measure, but it includes such factors, which contribute to the enjoyment of the experience of visiting a site, as seclusion, views, variety of landscape and habitat structure, colour, and natural sounds and scents.

Green Corridors

2.70 The London Plan (2016) definition of Green Corridors is:

This refers to relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

2.71 The draft new London Plan (2018) definition of Green Corridors is:

Relatively continuous areas of open space leading through the built environment, which may link to each other and to the Green Belt or Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

2.72 Green Corridors in London (London Ecology Unit: Advice Note 6 guidance from Dr. Dave Dawson 1991¹⁹) and the Merton Potential Sites and Draft Policies Maps (2013) identify the detailed criteria (see below) for sites which can be classified as making up a Green Corridor.

2.73 The essential tests are habitat composition and near continuity. The minimum habitat requirement is a natural surface: water or vegetation, and continuity is that the corridor network connects to the countryside, Green Belt or Metropolitan Open Land. Small discontinuities, such as division by a road, are allowed, but larger gaps are fatal. Most blocks of back garden land are isolated from the network, but sometimes they adjoin it, or the gap is small enough for them to be included. Corridor elements are not required to be any particular shape, to link sites, or link together into any particular geometry.

2.74 The detailed criteria are set out below:

- **Continuity** – corridors are required to lead from the countryside into the suburban and urban fabric. The size of gap between individual (terrestrial) sites forming a green corridor should be no more than the width of a tarmac road, provided that the ends of the corridor are more than a few metres wide.
- **Quality and Composition** – the corridor should have a natural surface of vegetation. All forms of terrestrial habitat are allowed, even close mown grass.
- **Shape** – there is no specific requirement for green corridors to be a particular shape.
- **Geometry** – Green corridors do not need to conform to any particular geometry: habitat composition and continuity are sufficient for their purpose. Neither do corridors need to link sites – a corridor which leads away from a main site into ‘nothing’ as it thins out is still able to support vegetation and animals.
- **Change** – sites change over time (abandoned land reverts to nature, landscaping is carried out, or open land is developed), so sites are continually being added to and removed from the network of green corridors.

¹⁹ https://www2.merton.gov.uk/sp2.48_green_corridors_-_dawson_1991.pdf

2.75 Green Corridor sites throughout the borough were reviewed by TEP to assess whether the boundaries and land cover met the criteria. Recommendations for changes to the Green Corridor boundaries are made in Section 3.

3.0 Boundary Reviews

3.1 Table 1 shows the sites that have been reviewed, including the relevant designation, and where a boundary change is proposed by indicating a Yes or No. Further information is then provided on the review of each site in line with the criteria set out in this chapter, including information on relevant planning applications. Appendix B provides the maps showing all of the designation boundary review changes.

Table 1: Boundary Review Sites & Designations by TEP

TEP Survey Point	Site Address	MOL	OS	SINC	GC
1	Clockhouse Close, off Parkside, Wimbledon SW19	-	-	-	GC22 Yes
2	Roads and dwellings off Camp Road, Wimbledon SW19	12 Wimbledon Common No	-	-	GC22 No
3	All England Lawn Tennis & Croquet Club Church Road Wimbledon, SW19 5AE & Somerset Road, Wimbledon, SW19 5HN	2 Wimbledon Park/AELTCC Yes	P035 Yes	-	GC23 Yes
4	Former Wolfson Hospital and Atkinson Morley Hospital, Copse Hill, Wimbledon SW20	5 Copse Hill Yes	P018 Yes	MeBI09 Yes	-
5	8A The Drive West Wimbledon SW20 8TG	-	S050 Yes	-	-
6	Land adjacent to 111 Coombe Lane, Wimbledon SW20 0QY	4 Beverley Brook/A3 Yes	P020 Yes	-	GC16 No
7	Land between Copper Mill Lane and Plough Lane, Wimbledon SW17 0BN	18 Wandle Valley No	W003 No	MeBI04 No	CG19 No
8	Haydon's Road Train Station, Haydons Road SW19 8SL 1 Caxton Road	-	-	MeBI01A Yes	GC19 Yes

TEP Survey Point	Site Address	MOL	OS	SINC	GC
9	Wandle Valley Sewerage Disposal Works, 100 Byegrove Rd, Colliers Wood SW19 2BJ	18 Wandle Valley Yes	- Yes	MeBI04 No	GC19 Yes
10	Pelham Primary School Southey Road Wimbledon London SW19 1NU	-	S062 Yes	-	-
11	Merton Hall Bowling Green, Manor Club Institute, 76 Kingston Road, Wimbledon SW19 1LA	-	P016 Yes	-	-
12	River Wandle, Priory Retail Park, Colliers Wood SW19 1DD	18 Wandle Valley Yes	W002 Yes	MeBI04 No	GC19 Yes
13	Dwellings at the end of Rutlish Road, South Wimbledon SW19 3AL	-	-	MeBII12 Yes	GC24 Yes
14	Eveline Day Nursery School, Meadowsweet Close, Grand Drive, Raynes Park SW20 9NA	3 Lower Morden Yes	P036 No	-	GC09 Yes
15	Morden Park Leisure Centre, Morden, SM4 5HE	16 Morden Park Yes	M050 Yes	MeBI11 Yes	GC10 Yes
16	Mostyn Park Scooter Park Public Convenience, Mostyn Gardens Open Space Mostyn Road, London SM4 5AQ	-	M051 No	-	GC12 No
17 & 18	Haig Housing Estate Hill Top & Rhodes Moorhouse Court Green Lane Morden SM4 5NS	-	M099 Yes M100 No	MeL22 Yes	-
19	Perseid Upper School, Middleton Road, Morden SM4 6RU	-	S055 Yes	MeBII01F Yes	GC10 Yes
20	Morden Recreation Ground Spinney	-	-	MeL08 No	GC10 No

TEP Survey Point	Site Address	MOL	OS	SINC	GC
21	64-70 Ravensbury Grove, Ravensbury Garages and Adj Land Mitcham Surrey CR4 4DL	18 Wandle Valley No	M053 Yes	M091 No	GC14 No
22	Tooting and Mitcham Hub – Imperial Fields Sports Ground, Bishopsford Road, Morden SM4 6BF	18 Wandle Valley No	P028 No	-	GC14 Yes
23	Cricket Green School, Lower Green West, Mitcham, CR4 3AF	-	S014 Yes	-	-
24 (OS & GC) 25 (MOL)	The Wilson Hospital, Cranmer Rd, Mitcham CR4 4LD	14 Mitcham Common No	S006 No	-	GC05 Yes
26	The Ravensbury Arms, 260 Croydon Road Mitcham, CR4 4JA	14 Mitcham Common No	M056 Yes	M093 Yes	GC05 Yes
26a	Miller & Carter Steakhouse, 1 Windmill Rd, Mitcham, CR4 1HT	14 Mitcham Common No	M056 Yes	M093 Yes	GC05 Yes
27	Former Westminster City Sports Ground, Mitcham CR4 1DQ	-	P030 No	-	-
28	Allotments behind 13 – 45 Hill Road, Mitcham CR4 2HS <i>*Unless there is a landownership issue</i>	-	A009 No*	-	GC19 No
29	Harris Academy Merton (Tamworth Manor High School) Wide Way Mitcham Surrey CR4 1BP	-	S032 Yes	-	-
30	Former Natwest sports ground, Turle Road Streatham SW16 5QN	-	P001a No	-	-
31	Pollards Hill Estate, Mitcham	-	M014 Yes	-	-

Survey Point	Site Address	MOL	OS	SINC	GC
32	Hollymount School, Cambridge Road, Raynes Park	-	S051 Yes	-	-
33	Former Lessa Sports Ground, Meadowview Road, Raynes Park	-	P006 No	-	-
34	Cannon Hill Lane, Raynes Park	-	P002 Yes	-	-
35	Stanford Primary School, Streatham	-	S020 Yes	-	-
36	St. Mary's Primary School, Wimbledon	-	S065 Yes	-	-
37	Ursuline High School, Crescent Road, Wimbledon	-	S052 Yes	-	-
38	Raynes Park High School, Bushey Road, Raynes Park	-	S008 Yes	-	-
39	Mary Tate Almshouses, Mitcham	-	New Yes	-	-
40	Part of Ravensbury Park, Ravensbury Estate, Mitcham	-	M053 Yes	-	-
41	Links Primary School, Tooting	-	S059 Yes	-	-

Site 1: Clockhouse Close, Parkside, Wimbledon

Green Corridor (GC22)

- 3.2 The area in question is predominantly residential, approximately 1.7ha in size. The area is dominated by buildings, including large residential properties and one commercial building, with associated hardstanding, amenity grassland, introduced scrub and scattered trees.
- 3.3 The front gardens of the properties comprise hardstanding and ornamental shrub. A small patch of closely mown amenity grassland with limited species diversity is present off Clockhouse Close. One semi-mature elm tree and one semi-mature willow tree are also present off Clockhouse Close. All other trees off Clockhouse Close are young. The back gardens of properties could not be accessed, but viewing over fences indicated no mature trees.

- 3.4 TEP recommends that Clockhouse Close, including all buildings, associated hardstanding, front and back gardens, and amenity grassland and scattered trees off Clockhouse Close are removed from the Green Corridor boundary as this area does not provide the necessary quality or continuity.

Site 2: Roads and dwellings off Camp Road, Wimbledon

Metropolitan Open Land (MOL 12 Wimbledon Common)

- 3.5 The area in question is a gated residential development, approximately 3.5ha in area. The development comprises large houses off Kinsella Gardens, Eversley Park and Cedar Park Gardens. It is within Wimbledon Common beside the golf course and nestled within woodland.
- 3.6 The development is of a considerable size, which would warrant removal from the MOL designation should it not meet the MOL criteria. However due to the setting and extent of semi-mature and mature trees (see review for Green Corridor GC22), the development is distinguishable from the built up areas surrounding the Common and appears to form part of the surrounding MOL. In addition the green infrastructure network remains largely uninterrupted. TEP recommends no boundary change to the MOL.

Green Corridor (GC22)

- 3.7 The residential community is gated so could not be accessed for assessment. Review has therefore been made through observations walking around the perimeter of the development, and through analysis of aerial imagery.
- 3.8 Review of aerial imagery and observations indicates that a number of semi-mature and mature trees remain within the site along the roads which all run north to south, and between the residential properties. These include mature Cedar trees, and semi-mature oak, poplar species and birch species. Mature trees are also present around the periphery of the development.
- 3.9 There are sufficient semi-mature and mature trees for the area to still function as a Green Corridor. The trees provide potential foraging and commuting habitat for bats and potential nesting and foraging habitat for birds.
- 3.10 TEP recommends no amendment to the Green Corridor boundary.

Site 3: All England Lawn Tennis & Croquet Club (AELTCC), Wimbledon

Metropolitan Open Land (MOL 2 Wimbledon Park)

- 3.11 The definition of MOL in the draft London Plan 2018 set out at paragraph 2.50 explains that it should apply to extensive tracts of land bound by urban development that fulfils a similar function to Green Belt and be protected by land use policies protecting it from inappropriate development. While the AELTCC site comprises a large area of land, it is not bound by urban development because its eastern boundary abuts Wimbledon Park's golf course. It is clear that much of this site comprises built form that is required to fulfil the sporting needs of the Wimbledon Championships.
- 3.12 The present MOL designation on this site includes the practice tennis courts in the north of the AELTCC site, north of the large Court 1 stadium, and the open space landscaping to the west of Court 1 and the open space used as temporary car parking. This part of the site, together with Wimbledon Park Golf Course and Wimbledon Park Lake comprises a significant area of land that is distinguishable from the built up area. This part of the site includes open air facilities for sport and recreation purposes that serve the people of London and are directly associated with the internationally recognised Wimbledon Championships. The northern part of this site is also designated as a Green Corridor, providing a link in the green infrastructure network.
- 3.13 TEP recommends that the present MOL designation applying to the AELTCC's northernmost portion is amended to remove the buildings, but retain the practice tennis courts and open space areas.

Open Space (P035)

- 3.14 The site is complex and contains an array of differing features and types of space. The great majority of the area contained within the present Open Space boundary is built form and hard standing with tennis courts as a very small proportion of the land area. For the large part, it cannot be described as 'open', even when the tennis courts are considered and it is inappropriate to apply the designation of Open Space to the full extent of the land.
- 3.15 There are pockets of land which are lawns, gardens or general open space and most of these are just within the north-western boundary. They are sufficient in size to consider meeting the Open Space boundary criteria as they are undeveloped and have public value. Access to these areas is restricted for the majority of the year, but they offer a significant amenity value to the public when tournaments are being hosted at the venue, as spaces to gather in and enjoy e.g. 'Murray Mound' (known by the AELTCC as Aorangi Terrace).
- 3.16 TEP recommends a boundary change to remove all parts of the site which are developed, including buildings and car parks, and to retain only the lawns, gardens and general open space in the northwest of the site (west of Court 1) in the Open Space designation.

Green Corridor (GC23)

- 3.17 The current Green Corridor boundary is along the north and north-west of the site. The area in question comprises a sports club building, hardstanding footpaths and access roads, lawn tennis courts, closely mown amenity grassland, hedgerow ornamental and native shrub and scattered trees. Trees and shrubs are planted along the lengths of the access roads and amongst areas of amenity grassland.
- 3.18 The amenity grassland, trees and shrubs within the site allow the area to function as a Green Corridor. The trees and shrubs provide potential foraging and nesting habitat for birds, and potential foraging and commuting habitat for bats.
- 3.19 TEP recommends an amendment to the Green Corridor boundary to remove the buildings, as these no longer form part of the open space corridor on the site.

Possible Specific AELTCC Policy

- 3.20 The AELTCC is a bespoke land use with an international profile and reputation. The value of the practice courts as part of a larger tract of land is described above. The public value of the other undeveloped areas of land comprising open space relate solely to the present use of the site as the AELTCC. The extent, locations and dispositions of the current open space may need to change if other development is required to maintain the overall function of the AELTCC. If the AELTCC site is to be subject of a bespoke policy addressing its form and function and how changes are managed, there would be little merit in identifying the current designations for protection in its present locations under an open space policy.

Site 4: Former Wolfson Hospital and Atkinson Morley Hospital, Wimbledon

Metropolitan Open Land (MOL 5 Copse Hill) & Open Space (P018)

- 3.21 There has been substantial development of the site, which has impacted on parts of the Open Space and MOL boundaries. Planning application 11/P0346 was approved for the demolition of existing hospital, outbuildings and residential accommodation. The demolition works will enable the provision of a 79 residential unit development, gym and car parking along with the resurfacing of existing 27 car parking spaces. Also approved under the planning application is the remodelling of the existing sports pitches, the refurbishment and extension of the existing scout hut, the replacement of the existing sports pavilion with a new changing room facility, the rebuilding and re-siting of the existing cottage, with landscaping, drainage and other associated works.
- 3.22 Planning application 16/P4853 was also approved for the erection of 75 residential units with associated arrangements including basement car parking and the provision of public and private landscaped spaces.
- 3.23 TEP recommends boundary amendments to Open Space and MOL as approved through the relevant planning applications on this site.

Site of Importance for Nature Conservation (SINC MeBI09)

- 3.24 The area in question comprises an area of woodland, approximately 1.15ha in area.
- 3.25 The woodland is located to north east of the recreational grassland associated with the 19th Wimbledon Scout Group, and to the west of the public footpath that connects Chambers Park Hill to Cottenham Park Road. The woodland comprises semi-natural broadleaved woodland, and contains a number of mature and semi-mature trees. The woodland is dominated by oak, Sycamore, birch species, ash, wych elm and *Acer* species are also present. The scrub layer is dominated by bramble and ivy. Other species include holly, ash and sycamore saplings, hawthorn, hedge bindweed and common nettle,
- 3.26 A number of trees support potential bat roost features, including dense ivy growing up stems and branches, stag ends and broken branches. The woodland provides habitat for nesting and foraging birds, potential roost sites for bats, foraging habitat for bats, and potential habitat for badger sett creation.
- 3.27 TEP recommends the woodland should be retained within the SINC. It contributes to the Borough's ecology, provides opportunity to enjoy nature, is of value to local people, has mature trees, aesthetic appeal and is not easily re-creatable.
- 3.28 TEP recommends no amendment is made for the woodland SINC.
- 3.29 A field is present adjacent to the western boundary of the SINC boundary. This comprises a modified neutral grassland field, which supports a diverse range of species including birds-foot trefoil. A pond is present which was dry at the time of survey. Rows of semi-mature trees, including oak, willow species, cherry species, hawthorn, blackthorn, dogwood, ash and *Acer* species delineate the field boundaries. Tree rows along the northern and southern site boundaries connect the field to the SINC. Common blue butterfly and large white butterfly were observed.
- 3.30 TEP recommends an amendment to the SINC boundary to include the modified neutral grassland field. The semi-mature trees, diverse grassland sward and pond contribute to the ecology of the area and the site provides an opportunity for the enjoyment of nature. The field was assessed as being of Borough Importance for Nature Conservation.

Site 5: 8A The Drive West, Wimbledon

Open Space (S050 Blossom House School Playing Fields)

- 3.31 The site consists mainly of development taking place in the wider area whereby works are in progress to demolish a school and erect 13 houses and the development boundary occupies most of the Open Space boundary (approved through planning application 15/P1750). The Open Space boundary also extends towards the rear gardens of residential properties on Durrington Park Road and contains a number of mature trees, which will be retained as part of the development. The area of open space remaining will total less than 0.09 ha of land, so will no longer meet the criteria of minimum 0.1 ha.

- 3.32 TEP recommends an amendment to the Open Space boundary to remove it in its entirety as a result of the approved planning application.

Site 6: Land adjacent to 111 Coombe Lane, Wimbledon

Metropolitan Open Land (MOL 4 Beverley Brook/A3) & Open Space (P020)

- 3.33 The section of land in question has been subject to a planning application for the demolition of a garage and the erection of a 4 bedroom house (14/P2600). Both the application and subsequent appeal have been refused. The land remains dominated by scrub and mature trees, some of which are subject to Tree Preservation Orders (TPOs).
- 3.34 The Planning Inspectorate Report (Appeal Ref: APP/T5720/W/15/3006352) dated 06/10/2015 provides evidence to dismiss the appeal based on, amongst other reasons, the impact on the MOL. The report also explicitly comments that;
- "Whether either this part of the site being included within the MOL is an anomaly or the boundary of the MOL should be altered are not matters for me to determine as part of this appeal".*
- 3.35 Through a review of this site, it is considered that this portion of land is not in keeping with the rest of the MOL site and does not meet any of the MOL criteria set out in the London Plan.
- 3.36 The area of MOL affected by the planning application boundary is owned privately by the applicant (owner of both 111 and 113, Coombe Lane). It does not offer sporting and leisure use, heritage value, and health benefits through encouraging walking, running and other physical activity, given its sylvan appearance.
- 3.37 The site also fails to meet the criteria for Open Space designation as it offers no sporting, visual or amenity value.
- 3.38 TEP recommends both the MOL and Open Space boundaries are amended to remove the MOL and Open Space designations for this site.

Green Corridor (GC16)

- 3.39 The area in question comprises a strip of scrub, approximately 7m wide, with semi-mature trees adjacent to 111 Coombe Lane. The area is enclosed by fencing. The scrub is dominated by bramble, with elm saplings, ash saplings, cow parsley and wood avens. Trees comprise one semi-mature elm and 6 semi-mature ash trees. Trees are up to 12m in height and many have ivy growing up the stems.
- 3.40 Adjacent to the fenced off strip is a footpath, adjacent to which are young to semi-mature trees, including holly, rowan, cherry and black poplar, and scrub including ivy, buddleja and cherry species.
- 3.41 The strip of vegetation provides a link from tree lines along Coombe Lane to the playing fields which comprises much of the Green Corridor.

- 3.42 TEP recommend no amendment to the Green Corridor boundary. The strip meets the criteria and potentially provides habitat for wildlife in the surrounding area.

Site 7: Land between Copper Mill Lane and Plough Lane, Wimbledon

Metropolitan Open Land (MOL 18 Wandle Valley) & Open Space (W003)

- 3.43 This section of land forms part of the River Wandle footpath network and consists of amenity grass with a mature hedge network running alongside the river Wandle. The eastern boundary of the MOL designation is the edge of the river, and the boundary of a car showroom.
- 3.44 The site meets the criteria for MOL as it forms part of a link in the network of green infrastructure and contributes to the physical structure of London by being clearly distinguishable from the built-up area. It also provides opportunities for leisure via the walking route.
- 3.45 The site meets the criteria for Open Space in its entirety as it is undeveloped, open to the public and has amenity value.
- 3.46 Additional open space to the west of the designated area forms part of the residential development, therefore is semi-private, and although accessible via a through route, is largely separated from the Wandle Valley footpath by fencing.
- 3.47 TEP recommends no boundary changes to the MOL and Open Space.

Site of Importance for Nature Conservation (SINC MeBI04) & Green Corridor (GC19)

- 3.48 The area comprises the River Wandle and banks. Species along the banks include crack willow, elder, bramble, pendulous sedge, nettle, blackthorn, Himalayan balsam, sycamore, hogweed, grey poplar, turkey oak, hawthorn, white poplar and ash. Commercial development is situated on the eastern side of the river, although this does not encroach into the corridor.
- 3.49 There are no gaps in connectivity along the river. TEP recommends no amendment for either SINC or Green Corridor.

Site 8: Haydon's Road Train Station, Caxton Road

Site of Importance for Nature Conservation (SINC MeBII01A) & Green Corridor (GC19)

- 3.50 The area in question comprises a block of flats and car park which were built in the SINC and Green Corridor (Planning application 10/P2827).
- 3.51 The northern boundary of the car park is delineated by a wall. Behind the wall is a 1m strip of bramble scrub. The scrub is separated by a fence from a 2m wide strip of amenity grassland on the platform.

- 3.52 TEP recommends a boundary amendment to remove the building and car park footprint from the SINC and Green Corridor, as there is no longer vegetation present to contribute to these designations.

Site 9: Wandle Valley Sewerage Disposal Works, Colliers Wood

Metropolitan Open Land (MOL 18 Wandle Valley)

- 3.53 The section of the MOL is located off Byegrove Road and comprises Wandle Valley Sewerage Works; a private residential property (Wandle Valley Cottage) on Byegrove Road; and the River Wandle corridor and footpath network.
- 3.54 The River Wandle corridor is part of the wider Wandle Valley network and should remain part of the designation as it meets all MOL designation criteria.
- 3.55 Wandle Valley Cottage is part of the site that is distinct from the built up area; it is a single detached property set amongst mature trees, which also provide a link in the network of green infrastructure.
- 3.56 The sewerage works are also distinct from the built up area, and the tanks in particular provide a link in the network of green infrastructure.
- 3.57 TEP recommends a boundary amendment to extend the MOL boundary to include the eastern part of the site, which is clearly distinguishable from the adjoining built up area and allows for continuity of the Wandle Valley. While this part of the site contains some built form, it is directly associated with the other parts of the site.

Open Space

- 3.58 There is a potential to designate a stretch of the River Wandle corridor and footpath network as Open Space. This would align to the site being a green corridor in the open space assessment categorisation (it is also a designated Green Corridor). This would be consistent with other sections of the Wandle Valley which are also categorised as green corridors and also designated as Open Space.

Site of Importance for Nature Conservation (SINC MeBI04) & Green Corridor (GC19)

- 3.59 A stream is located off the River Wandle, accessed via Byegrove Road. The stream is currently designated as SINC but not as Green Corridor.
- 3.60 The stream comprises the same habitat as the River Wandle, although is a narrower channel. No aquatic vegetation was observed. Bankside vegetation includes young and semi-mature sycamore and alder, privet, snowberry, cypress sedge, pendulous sedge, ivy, harts tongue fern and buddleja. The stream was surveyed from a distance so a full species list could not be compiled.
- 3.61 The stream flows around a building and then goes underground, under Byegrove Road. It is not obvious where the stream then emerges.

- 3.62 The stream should remain in the SINC. As the stream runs around the building and goes underground, a habitat link is also formed through the mature trees that run along the south of the site and towards Byegrove Road.
- 3.63 TEP recommends no amendment to the SINC corridor, but recommends that the Green Corridor boundary be extended to account for the habitat link through the mature trees that run above the stream and across Byegrove Road to connect with Wandle Park to the south.
- 3.64 TEP also recommend an omission to the Green Corridor boundary where it currently crosses Byegrove Road, as the exiting link is severed by a building and the road at this point.

Site 10: Pelham Primary School, Wimbledon

Open Space (S062)

- 3.65 The site currently consists primarily of buildings associated with the school and hardstanding areas for outdoor play. There are no natural greenspaces on site apart from a small number of semi-mature trees. A planning application (13/P2659) was approved to develop the school to erect an extension to existing school buildings, which will reduce some existing areas for outdoor play. There was no evidence on site that development has taken place to date.
- 3.66 TEP recommends a boundary amendment to remove this site from Open Space designation as it does not meet the criteria because the site is almost entirely buildings.

Site 11: Merton Hall Bowling Green, Wimbledon

Open Space (P016)

- 3.67 The site consists of a disused bowling green at the rear of a large building formerly known as the Manor Club. As a bowling green, the site met the Open Space criteria for sports field. The bowls green does not appear to have been used for some time and was classified in the Merton Playing Pitch Strategy (2019) as disused and no longer required for bowls. The site is privately owned and has been recently cleared, with no green space available for use. Development is currently underway directly to the north of the site boundary, but appears to have no impact on the boundary itself.
- A planning application has been submitted (19/P2120) for this site and the adjacent site to restore the Manor Club building and build a six storey residential block to provide 26 residential units. The application does not propose to build on the open space. At the time of writing, the application has not yet been decided.
- 3.68 TEP recommends that the Open Space designation is removed as it no longer meets the open space criteria.

Site 12: River Wandle, Priory Retail Park, Colliers Wood

Metropolitan Open Land (MOL 18 Wandle Valley) & Open Space (W002)

- 3.69 The site comprises the River Wandle and associated land along the river consisting of a network of footpaths and footbridges, and remains of historic structures associated with the former use of the area as a priory (the priory wall is part of a Scheduled Ancient Monument). Despite being in a built up area adjacent to a large retail park, the river and footpaths are distinguishable from the built up area and provide an alternative walking route to adjacent roads. The site links to the Wandle Valley Regional Park network to the north and south, providing recreation and leisure opportunities serving the wider area. The watercourse and paths forms part an important link in the network of green infrastructure. The Open Space is categorised²⁰ as a Green Corridor. The site is also designated as a Green Corridor and a SINC (Borough Grade 1).
- 3.70 TEP recommends a minor boundary amendment to the MOL to remove the retail properties which back onto Wandle Park, on the northern side of Merton High Street.
- 3.71 TEP recommends a minor addition to the Open Space boundary to include the footpath, which clearly forms part of the open space and appears to be an anomaly on the previous designation.

Site of Importance for Nature Conservation (SINC MeBI04) & Green Corridor (GC19)

- 3.72 The area comprises the River Wandle and banks which flows around the retail park. The banks are vegetation with amenity grassland, scrub, vegetation and semi-mature trees. Species include broadleaved dock, butterfly bush, common nettle, hazel, willow and bramble. A hardstanding footpath runs adjacent to the river corridor.
- 3.73 There are no gaps in connectivity along the river. TEP recommends no amendment for the SINC. A minor amendment to the Green Corridor boundary should be made to remove the retail properties which back onto Wandle Park, on the northern side of Merton High Street and align the Green Corridor with the SINC and MOL.

Site 13: Dwellings at the end of Rutlish Road

Site of Importance for Nature Conservation (SINC MeBII12) & Green Corridor (GC24)

- 3.74 The area in question is a collection of residential properties, hardstanding car park and a footpath built immediately east of a tram line. A vegetated area and footpath is present adjacent to the tram stop to the north of the residential development. The vegetation includes bramble scrub, closely mown amenity grassland, a sycamore tree, snowberry and privet hedge.

²⁰ <https://www.gigl.org.uk/open-spaces/open-space-categories/>

- 3.75 TEP recommends a boundary amendment to remove the vegetated area and footpath adjacent to the tram stop from the SINC. The area is of low ecological value, and does not contribute to the borough ecology or provide opportunity for enjoyment of nature.
- 3.76 TEP recommends a boundary amendment to remove the footprint of the residential properties, hardstanding car park and footpath from the Green Corridor.

Site 14: Eveline Day Nursery School

Metropolitan Open Land (MOL 3 Lower Morden) & Open Space (P036)

- 3.77 Meadowsweet Close leads off Grand Drive leading into the MOL boundary, with the majority of the MOL designation appearing to the south of Meadowsweet Close. There is a grass verge to the north of Meadowsweet Close. The land to the south is comprised mainly of scrub, unmanaged grassland and self-set trees. There are some examples of semi-mature trees running along a ditch across the site. Some sections of the day nursery buildings and associated hardstanding are within the MOL designation area.
- 3.78 TEP recommends a boundary amendment to remove any buildings and associated hardstanding which form part of the Nursery School from the MOL designation, as they are not distinguishable from the built up area.
- 3.79 The Open Space boundary does not include the Nursery School, therefore no boundary change is required.

Green Corridor (GC09)

- 3.80 The area in question comprises a children's play area associated with nursery buildings. The play area is dominated by hardstanding play surfaces, with closely mown amenity grassland and wooden sheds. There are no trees or shrubs within the area.
- 3.81 TEP recommends boundary amendment to remove the children's play area from Green Corridor. The hardstanding which dominates the area is not a natural surface so does not meet Green Corridor criteria. The closely mown amenity grassland is small in area and provides limited function for species foraging or ranging, with no trees or shrubs to provide connectivity.

Site 15: Morden Park Leisure Centre

Metropolitan Open Land (MOL 16 Morden Park) & Open Space (M050)

- 3.82 At the time of the site visit, the new leisure centre and associated parking and provisions were being developed, with the new footprint visible. The development is built in MOL, however the former leisure centre will be newly designated as MOL and Open Space as a land swap, agreed through the approved planning application (16/P0882). There will be a net gain of 749sqm of MOL.

- 3.83 TEP recommends a boundary amendment for both Open Space and MOL to accommodate the new location of the leisure centre footprint and subsequent loss and gain of Open Space and MOL. The associated carpark, Morden Park playground and Merton Registry Office should also be designated as MOL and Open Space as a slight extension to the MOL boundary.
- 3.84 The Open Space identified as Merton Technical College (S057) has been built over and forms part of the Merton College buildings and should be removed as an Open Space designation.

Site of Importance for Nature Conservation (SINC MeBI11) & Green Corridor (GC10)

- 3.85 The SINC boundary cuts through half of the neutral grassland field, so that a pond is included within the SINC. To the east of the pond the neutral grassland field continues, and is bordered by trees and hedgerow. This is the same grassland habitat as within the western portion of the field.
- 3.86 TEP recommends the SINC boundary be amended to include the eastern portion of the neutral grassland field.
- 3.87 The new leisure centre building extends in to a neutral grassland field. The neutral grassland field is within the Green Corridor but not within the SINC. The footprint of the building should be removed from the Green Corridor.
- 3.88 A complex of building and hardstanding is also present within the north west of the Green Corridor. This area is not in the SINC. This area should also be removed from the Green Corridor.

Site 16: Mostyn Park Scooter Park

Open Space (M051)

- 3.89 The Open Space boundary in its entirety includes the vast majority of Mostyn Gardens, which contains the community scooter park. The gardens have a wide range of features, both natural (specimen trees, lawns, playing fields) and man-made (outdoor gym, bowling greens, outdoor play). The community scooter park itself is a structure which is ancillary to the context of its surroundings i.e. an open space for public use and can be considered as forming part of the wider Mostyn Gardens.
- 3.90 TEP recommends no amendment to the Open Space boundary as there is no change to the use of the site as Open Space.

Green Corridor (GC12)

- 3.91 The area comprises a scooter park which has been built in the Green Corridor. The scooter park comprises a tarmac scooter track, amenity grassland, shrubs and semi-mature and mature trees.

- 3.92 Vegetation dominates the area. Shrubs include field rose, hazel, snowberry, ivy, elder, butterfly bush and bryony. Semi-mature to mature trees include alder, turkey oak, birch, purple sycamore, ash, yew, purple beech, hazel, large leaved lime, cherry and sycamore.
- 3.93 The tarmac scooter track is maximum 2m wide, and does not disrupt connectivity between patches of amenity grassland and semi-mature trees. The semi-mature to mature trees provide connectivity for birds and bats from the scooter park to the wider area of Mostyn Gardens Park.
- 3.94 TEP recommends no amendment to the Green Corridor boundary.

Site 17 & 18: Haig Housing Estate Hill Top & Rhodes Moorhouse Court, Morden

Open Space (M099 & M100)

- 3.95 Both sites are contained within a private, gated residential housing estate. The housing estate itself caters for ex-service personnel and appears to be a former barracks. Site reference M100 (point 17) consists of amenity grass with mature trees located around the boundaries and represents an area of open space for the housing estate.
- 3.96 Site reference M099 (point 18) is being developed via the demolition of garages and erection of 68 residential units off Rhodes Moorhouse Court (planning application 16/P1696). The development is underway and has resulted in the loss of Open Space (M099) through the approved planning application, but M100 is unaffected.
- 3.97 TEP recommends that Open Space M099 be removed from Open Space designation, given that the new development will be built on this area it will no longer meet the open space criteria. Open Space M100 still meets the criteria for Open Space designation.

Site of Importance for Nature Conservation (SINC MeL22)

- 3.98 The estate comprises veteran's housing, hardstanding roads and car parking, amenity grassland and mature trees, including oak, ash and yew.
- 3.99 Within the south west corner of the site, behind the car park, is an area of closely mown amenity grassland, ornamental shrub, scrub and young to semi-mature trees. Tree species include turkey oak, Lawson cypress, weeping willow, elm and eucalyptus. This area does not meet the criteria for the SINC, which was designated for its mature trees giving it the feel of an arboretum.
- 3.100 TEP recommend a boundary amendment to remove the amenity grass and ornamental shrubs area from the SINC.
- 3.101 Tennis courts are present surrounded by mature trees. TEP recommends an amendment of the SINC boundary to remove the tennis court footprint from SINC.

Site 19: Perseid Upper School, Morden

Open Space (S055)

- 3.102 The site consists of the outdoor sports provision and play associated with the school, including a multi-use surface for tennis and football, along with a generic playing field for students to use. The site is inaccessible for the public.
- 3.103 Planning application no. 17/P0148 has been granted subject to conditions. It will impact on the Open Space boundary at this site. The application is for the erection of a single storey north-west extension, a two storey rear central extension and two single storey south east extensions. The footprint of the development will result in the loss of a small area of land currently designated as Open Space.
- 3.104 TEP recommends a minor boundary change to accommodate the development footprint, in line with the open space criteria.

Site of Importance for Nature Conservation (SINC MeBII01F) & Green Corridor (GC10)

- 3.105 The site comprises land occupied by Perseid Upper School, including school buildings and associated hardstanding, amenity grassland, hedgerow and shrub planting, woodland, tree rows and scattered trees.
- 3.106 Extensions to the school, including new school buildings and hardstanding extend in to the Sutton Line South of Wimbledon SINC and Green Corridor.
- 3.107 TEP recommends boundary changes to the SINC and Green Corridor to reflect the extensions to the school. The new school buildings and hardstanding should be removed from the Green Corridor, as the area is now a man-made surface which does not meet the Green Corridor criteria of vegetation surface and connectivity. The buildings and hardstanding should also be removed from the SINC, as the habitats are not of ecological value.

Site 20: Morden Recreation Ground Spinney

Site of Importance for Nature Conservation (SINC MeL08) & Green Corridor (GC10)

- 3.108 The spinney comprises semi-natural broadleaved woodland, with young, semi-mature and mature trees. Tree species include English oak, ash, English elm, sycamore, elder, hawthorn, horse chestnut, hazel, field maple, London plane, Norway maple and holly. The scrub layer comprises hawthorn, bramble, ivy, snowberry, wood avens, butchers broom, cow parsley and nettle.
- 3.109 The spinney provides opportunities for local people to enjoy nature, is easily accessible, and is not easily re-creatable. Change in management e.g. being taken over by a local wildlife group will enhance the woodland.
- 3.110 TEP recommends no amendment for either the SINC or Green Corridor.

Site 21: 64-70 Ravensbury Grove, Ravensbury Garages

Metropolitan Open Land (MOL 18 Wandle Valley) & Open Space (M053)

- 3.111 The approved planning application (16/P1968) is to demolish existing garages and flats and redevelop the footprint into 21 residential units. The development includes the provision of 592.03sqm of open space, but will result in an overall net loss of designated Open Space. The planning decision was granted on the basis that new open space provision will be designated as Open Space at the next Local Plan review.
- 3.112 The proposed development does not encroach into the MOL boundary.
- 3.113 TEP recommends no amendment to the MOL boundary, and the Open Space boundary should be amended in accordance with the approved planning application, development footprint and the provision of new open space, which should be included as designated Open Space.

Site of Importance for Nature Conservation (SINC M091) & Green Corridor (GC14)

- 3.114 The area in question comprises a channelized stream which feeds in to the river Wandle (one of the finest chalk streams in London) in the north-west section of Ravensbury Park.
- 3.115 The channelized stream flows around the northern boundary of Ravensbury Park, linking to the River Wandle at two points. The stream has no aquatic flora. Semi-mature trees grow on the banks, including hawthorn, sycamore, ash, crack willow and poplar species. Many trees have ivy growing up them. The scrub layer and ground flora consists of bramble, sycamore, ivy, broadleaved dock, ash, cow parsley, brome species, nettle, elder, cherry, horse chestnut and dogwood. Ivy covers much of the ground.
- 3.116 The tributary flows in to a chalk stream, has bridges across it giving it urban character, is easily accessible to the public, and provides opportunity for enjoyment of nature and is of value to local people.
- 3.117 TEP recommends no amendment for either the SINC or Green Corridor.

Site 22: Tooting and Mitcham Hub, Morden

Metropolitan Open Land (MOL 18 Wandle Valley) & Open Space (P028)

- 3.118 The site comprises a sports stadium, artificial and grass football pitches / training facilities, access road, car parking and other associated buildings. Additionally, there is an area to the south of the stadium which consists of rough grassland and scattered scrub.
- 3.119 Both the Open Space and MOL boundary include all parts of the site.

- 3.120 TEP recommends that the stadium, pitches and associated facilities are retained as MOL. Despite the high density of built facilities, the purpose of the site is for leisure, recreation and sport, and as a hub with a range of facilities it serves a wide area. It also forms part of a link in the network of green infrastructure.
- 3.121 The grassland field to the south of the sports hub is distinguishable from the adjoining built up area (and the built facilities of the sports hub), and forms part of a link in the network of green infrastructure. It also forms part of a Green Corridor and contains features of nature conservation value and habitat interest (see GC14 below). TEP recommends that this area is retained as part of the MOL designation.
- 3.122 The whole site meets Open Space criteria as it is outdoor sports provision with ancillary buildings. The grassland is accessible from the sports facilities but does not form part of the sports use. TEP recommends that the stadium, pitches and associated facilities are retained as Open Space.

Green Corridor (GC14)

- 3.123 The area in question comprises the sports club building, access road, car park and artificial sports pitches, which were built in the Green Corridor.
- 3.124 To the south of the building complex is a modified neutral grassland field, bounded by scrub and scattered trees. Scrub and trees comprise bramble, field maple ash, weeping willow, nettle, broadleaved willowherb, hedge bindweed, hornbeam, hawthorn, dogwood and elm.
- 3.125 A strip of trees and modified neutral grassland, approximately 8m wide, is present to the north west of the sports complex. Trees include sycamore, ash, cherry species, English oak, elm, field maple and silver birch.
- 3.126 TEP recommends an amendment to remove the footprint of the stadium, car park, artificial sports pitches and access road from the Green Corridor because they no longer meet the Green Corridor criteria of vegetation surface and connectivity. The surrounding habitats comprising modified neutral grassland, scrub and trees should be retained.

Site 23: Cricket Green School, Mitcham

Open Space (S014)

- 3.127 The site consists of Open Space associated with the Cricket Green School, including woodland and sports pitch provision. Planning application 18/P0086 approved a proposal to construct a new two storey building and demolish the existing temporary modular building, as well as the construction of new hard play area and associated soft landscaping. The proposal also includes the erection of single storey extension on two blocks of the school. The development will negatively impact the amount of Open Space currently available as there will be a loss of two of the main areas of woodland within the site to either building extension or car parking, with proposed new areas of open space to be provided.

- 3.128 TEP recommends an amendment of the Open Space boundary to reflect the approved development footprint only, as the remaining land currently designated as Open Space will continue to meet the criteria.

Site 24 & 25: The Wilson Hospital

Metropolitan Open Land (MOL 14 Mitcham Common - site 25)

- 3.129 The Wilson Hospital site, including all buildings and associated hard standing are not within the MOL designation and are located just south of the boundary, which runs along the north of the A239 Cranmer Road. The site itself consists mainly of Hospital buildings and car parking with occasional pockets of amenity green space. Any future development of the buildings is unlikely to extend into the MOL designation.
- 3.130 TEP recommends no amendment to the MOL boundary.

Open Space (S006 - site 24)

- 3.131 The site in question is the Cranmer Primary School and could not be audited due to access being restricted/unavailable. However, the Open Space boundary appears to only include the large soft landscaped open spaces within school grounds, which does meet the criteria for Open Space.
- 3.132 TEP recommends no amendment to the Open Space boundary.

Green Corridor (GC05)

- 3.133 The areas in question are immediately to the north-west, south west and south east of the hospital building and car park.
- 3.134 To the north west of the car park is a row of semi-mature to mature trees, comprising white poplar, sycamore, field maple, elder, horse chestnut, birch species, English oak and large leaved lime.
- 3.135 To the south east of the car park is closely mown amenity grassland, a building, semi-mature to mature scattered trees with ivy growing up the trunks, and modified neutral grassland. Tree species include sycamore, English oak, birch and horse chestnut.
- 3.136 To the south west of the car park the area comprises closely mown amenity grassland and tree rows, including ash, white poplar, silver birch, poplar species, ivy, rose species, bramble and elder.
- 3.137 TEP recommends an amendment of the Green Corridor boundary to remove the building footprint from the Green Corridor designation with the other habitats retained.

Site 26 and 26a: The Ravensbury Arms and Miller & Carter Steakhouse, Mitcham

Metropolitan Open Land (MOL 14 Mitcham Common)

- 3.138 Both of these pubs/restaurants, including outdoor seating areas and car parks are situated within a larger MOL area and contribute to the provision of open air facilities, especially for leisure which serve the whole or significant parts of London. The wider MOL area also provides a significant amount of land which forms part a significant link in the network of green infrastructure. The Mill House Ecology Centre is also located adjacent to the Miller & Carter Steakhouse.
- 3.139 TEP recommends no amendment to the MOL boundary for either of these sites as the buildings and car parks do not detract from the wider area designated as MOL.

Open Space (M056)

- 3.140 TEP recommends a boundary amendment to remove the footprint of the restaurant buildings, car parks, beer garden and fenced off courtyards from the Open Space boundary as they are not ancillary to the open space use.
- 3.141 The Mill House Ecology Centre and associated car park are used by the Mitcham Common Conservators. As this is an ancillary use to the wider Mitcham Common, it is recommended that this part of the site remains designated as Open Space.

Site of Importance for Nature Conservation (SINC M093) & Green Corridor (GC05)

- 3.142 The area in question comprises the Ravensbury Arms pub, Miller & Carter Steakhouse and the Mill House Ecology Centre which were built within the SINC/Green Corridor.
- 3.143 These sites comprise pub/restaurant buildings, an ecology centre building, hardstanding car parks, beer gardens, and courtyards.
- 3.144 The hardstanding car park has 1 mature horse chestnut tree and 2 mature London plane trees in the centre. The beer garden comprises closely mown amenity grassland and ornamental shrubs. A row of mature London plane trees is present between the car park and the beer garden.
- 3.145 The fenced off courtyards comprise hardstanding with ephemeral/short perennial vegetation. One courtyard has a single story brick building, one has a storage tanker.
- 3.146 TEP recommends a boundary amendment to remove the footprint of the buildings, car parks, beer gardens and fenced off courtyards from the SINC and Green Corridor as they do not meet the habitat or continuity criteria.

Site 27: Former Westminster City Sports Ground, Mitcham

Open Space (P030)

- 3.147 The site is a former sports pitch which has fallen out of use and is now unmanaged. The boundaries are formed by a tree belt and apart from one small road off Tamworth Lane, there is no access to the site. The site currently meets the criteria for Open Space because, despite being out of use as a sports pitch, it remains predominantly undeveloped and continues to have the potential to offer public value as an amenity area.
- 3.148 In planning terms, should an application be submitted for an extension of the cemetery, or the site be brought back into use as a playing pitch it would not result in the requirement for an amendment to the Open Space boundary.
- 3.149 Considering all aspects of the site at the current time, TEP recommends no amendment to the Open Space boundary.

Site 28: Allotments behind 13 – 45 Hill Road, Mitcham

Open Space (A009)

- 3.150 TEP recommends no amendment to the Open Space boundary as the area continues to offer amenity value to the public as an allotment.
- 3.151 There is potentially an encroachment issue if the land which appears to be allotments to the rear of the properties at 13-29 Hill Road is actually an encroachment of adjacent properties, or there needs to be a change of designation boundary if the land is privately owned by the adjacent properties. This will require land registry search or direct contact with these land owners to ascertain this.

Green Corridor (GC19)

- 3.152 The area in question comprises allotments, including vegetable patches, amenity grassland, bare ground paths, scattered trees, shrubs and wooden sheds.
- 3.153 The allotments were observed from the gate which was padlocked. Species observed include ash, hazel, hawthorn, ivy, privet, annual meadow grass, broadleaved dock, cow parsley, bramble, knotgrass, cherry species, sycamore and apple trees. Large white butterfly was also seen.
- 3.154 TEP recommends no amendment to the Green Corridor boundary. The area provides a habitat link for bats, birds, insects and mammals.

Site 29: Harris Academy Merton (Tamworth Manor High School), Mitcham

Open Space (S032)

- 3.155 The site consists of a school, including associated buildings and outdoor sports and play provision (artificial surface, hard standing and grass). The north and east boundaries of the site are shared with the rear gardens of houses and the south boundary backs onto a park. The west boundary is shared with the B272 Wide Way.
- 3.156 Planning application no 16/P1487 has been granted subject to conditions for the construction of a new two storey classroom block comprising 6no. general teaching classrooms, 2no. ICT suites, staff room, offices and other auxiliary spaces to existing secondary school.
- 3.157 The new classroom block has been constructed and has impacted on the Open Space boundary, creating a loss of grass playing field.
- 3.158 TEP recommends the boundary be changed to reflect the approved planning application, including the building footprint and other ancillary uses.

Site 30: Former Natwest Sports Ground, Streatham

Open Space (P001a)

- 3.159 The site comprises a former sports ground, which is now used by the Hope Ministries London. The site is currently managed as rough grassland with occasional pockets of scrub and individual mature trees along the east and north boundaries. The site does not appear to have an active use for the public and access is restricted.
- 3.160 The site continues to meet the open space criteria. Although it doesn't appear to be in use as a sports facility, there has been no formal change of use of the site. The grassland remains open, and the car park and buildings are ancillary to the open space.
- 3.161 TEP recommends no amendment to the Open Space boundary.

Site 31: Donnelly Green, Pollards Hill Estate, Mitcham

Open Space (M014)

- 3.162 The area in question is being redeveloped following planning application ref.15/P4305 being granted for the erection of 90 residential units, involving the demolition of 24 existing residential units and the construction of new estate access road with associated parking courts and car/cycle spaces. Pre-development, the area was already a housing estate with a high proportion of green space, the vast majority of which is designated as Open Space. New landscaping and waste storage facilities are also included in the development to complement green spaces already existing within the housing estate.

- 3.163 Redevelopment will impact on Donnelly's Green (Open Space within the development footprint) with the loss of 1.2ha of designated Open Space. However, development does include the provision of a grass pitch and an area of nature play elements and there is no adverse impact on protected species and/or biodiversity. The planning committee reports states the proposals provide an opportunity overall to enhance tree planting.
- 3.164 TEP recommends an amendment to the Open Space boundary to designate the configuration of open space on site as approved and developed through the planning application.

Site 32: Hollymount School, Cambridge Road, Raynes Park

Open Space (S051)

- 3.165 This site contains predominantly school buildings and hard standing areas, some of which contain dedicated play spaces. The western part of the site contains some soft landscaping areas. As these do not meet the criteria for Open Space, the current designation should be removed in its entirety.

Site 33: Former Lessa Sports Ground, Meadowview Road, Raynes Park

Open Space (P006)

- 3.166 The boundaries of this site are formed by residential terrace houses on three sides, residential units to the north separated by a hardstanding access way, with some mature trees and shrubs around the edges.
- 3.167 The site comprises three parts. The majority of the site is rough grassland, which appears to be maintained and is fenced off, with no public access and no active use. There is also a securely gated play space which is accessible only to the residents of the Meadowview Road development. To the north of the site, there is a public footpath which connects Grand Drive to Westway and 5 tennis courts which are managed by the Raynes Park Residents Lawn Tennis Club, in addition to an area of amenity space.
- 3.168 The southern area of the site has previously been identified as a sports pitch and is currently referred to in the Merton Playing Pitch Strategy (2019). As such, the site continues to meet the open space criteria as it remains predominantly undeveloped and continues to have the potential to offer public value as an amenity area. Although it is not currently in use as a sports facility, there has been no formal change of use of the site. The tennis courts and ancillary buildings to the north of the site continue to meet the Open Space criteria, as does the playground.
- 3.169 No amendments are recommended to the Open Space boundary.

Site 34: 274-312 Cannon Hill Lane, Raynes Park

Open Space (P002)

- 3.170 This site is located at the rear of six residential properties along Cannon Hill Lane. It is privately owned and is accessible only via a shared and gated driveway in between 320 and 322 Cannon Hill Lane. The All England Community Sports Ground lies directly adjacent to the north and the land to the west is currently unused (formerly a Scout Hall). The site is approximately 0.2 hectares in size and contains overgrown vegetation and some larger trees.
- 3.171 The site does not form part of the adjacent site known as Raynes Park Playing Fields, however it has been given the same designation. Given that it is landlocked, the site does not offer any public accessibility or visual amenity and is not designated as a Green Corridor or SINC.
- 3.172 It is recommended that the Open Space designation be removed for this parcel of land as it does not meet the Open Space criteria.

Site 35: Stanford Primary School, Streatham

Open Space (S020)

- 3.173 This site contains predominantly school buildings and hard standing areas, some of which contain dedicated play spaces. The south western part of the site contains soft landscaping areas. As these do not meet the criteria for Open Space, the current designation should be removed.

Site 36: St. Mary's Primary School, Wimbledon

Open Space (S065)

- 3.174 This site contains school buildings and hard standing areas, some of which contain dedicated play spaces. There are some trees to the east of the site, however these form a very small area in size. The Open Space designation should be removed as it does not meet the criteria because the site is almost entirely buildings and hard standing areas.

Site 37: Ursuline High School, Crescent Road, Wimbledon

Open Space (S052)

- 3.175 This site contains school buildings and hard standing areas, some of which contain dedicated play spaces. The Open Space designation should be removed as it does not meet the criteria because the site is almost entirely buildings and hard standing areas.

Site 38: Raynes Park High School, Bushey Road, Raynes Park

Open Space (S008)

- 3.176 This is an anomaly that is being rectified through this open space review. While Open Space S008 will remain designated for the school, the sliver of land shown on the map should be removed as it does not form part of the school land.

Site 39: Mary Tate Almshouses, Mitcham

- 3.177 This site forms the rear of the Mary Tates Cottages. The site is not publically accessible, is 0.11 hectares in size and is currently utilised as allotments, offering an amenity value through community gardening which should be protected.
- 3.178 It is recommended that this area be designated as new Open Space, under the Allotments, Community Gardens and City Farms Open Space category, subject to a site visit to confirm the current use.

Site 40: Part of Ravensbury Park, Ravensbury Estate, Mitcham

Open Space (M053)

- 3.179 This parcel of land was identified through the Estates Local Plan process for de-designation. It is simply being identified here to ensure that its removal is included in the updated Local Plan maps.

Site 41: Links Primary School, Tooting

Open Space (S059)

- 3.180 This site contains school buildings and hard standing areas, some of which contain dedicated play spaces. The Open Space designation should be removed as it does not meet the criteria because the site is almost entirely buildings and hard standing areas.

APPENDIX A: MOL Criteria Table

METROPOLITAN OPEN LAND – ASSESSMENT CRITERIA

In accordance with London Plan Policy 7.17 (and emerging policy G3), boroughs should designate MOL by establishing that the land meets at least one of the following criteria.

London Plan MOL Purpose (Policy 7.17 and draft policy G3)	Rating and Criteria Assessment		
	High	Medium	Low
Does the land contribute to the physical structure of London by being clearly distinguishable from the built up area?	The land is clearly distinguishable from the adjoining built up area and makes a significant contribution to the physical structure of London.	The land is moderately distinguishable from the adjoining built up area and makes a contribution to the physical structure of London.	The land is not clearly distinguishable from the adjoining built up area and does not make a contribution to the physical structure of London.
Does the land include open air facilities for leisure, recreation, sport, the arts and cultural activities which serve either the whole or significant parts of London?	The land includes open air facilities of a London importance.	The land includes open air facilities of a local importance.	The land does not include any open air facilities.
Does the land contain features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value?	The land contains features or landscapes of national or metropolitan value.	The land contains features or landscape of a local value.	The land does not contain any features or landscapes.
Does the land form part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria?	The land forms part of a strategic corridor, node or link in the green infrastructure network and meets one of the criteria above.	The land forms part of a strategic corridor, node or link in the green infrastructure network but does not meet any of the criteria above.	The land does not form part of a strategic corridor, node or link in the green infrastructure network and does not meet any of the criteria above.

Type of Contribution	Description
High	The site makes a clear and significant contribution to a MOL purpose.
Medium	The site makes a moderate contribution to a MOL purpose, but may have been compromised by development.
Low	The site makes limited or no contribution to a MOL purpose, it does not have a clear role and/or has been compromised by development.

APPENDIX B: GIS Designation Maps



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