



# GREEN INFRASTRUCTURE, BIODIVERSITY AND OPEN SPACE STUDY

## LONDON BOROUGH OF MERTON

### POLICY AND CONTEXT REVIEW TECHNICAL REPORT

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## 1.0 Introduction

- 1.1 This report has been produced by The Environment Partnership (TEP) Ltd on behalf of the London Borough of Merton (LBM) to review, and provide a contextual analysis on the national, regional and local planning policies relevant to the Green Infrastructure, Biodiversity and Open Space Study, which will provide up to date information to inform Merton's emerging Local Plan.
- 1.2 The Mayor of London and Greater London Authority have already undertaken a wide range of work to promote and encourage green infrastructure, biodiversity and open space through the London Plan and Supplementary Planning Guidance.
- 1.3 The statutory development plan for the London Borough of Merton comprises:
- Merton's Core Planning Strategy 2011-2026;
  - Merton's Site and Policies Plan and Policies Maps 2014-2024;
  - Merton's Estates Local Plan 2018; and
  - The London Plan.
- 1.4 The London Borough of Merton has adopted several plans with aims and objectives to reduce health inequalities and improve the health and wellbeing (including mental health) of Merton's residents. Merton council has adopted a Health in All Policies approach, which means health and wellbeing is a key factor for all borough plans and policies, including open space provision, as considered in this report.
- 1.5 The Policy and Context Review 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.

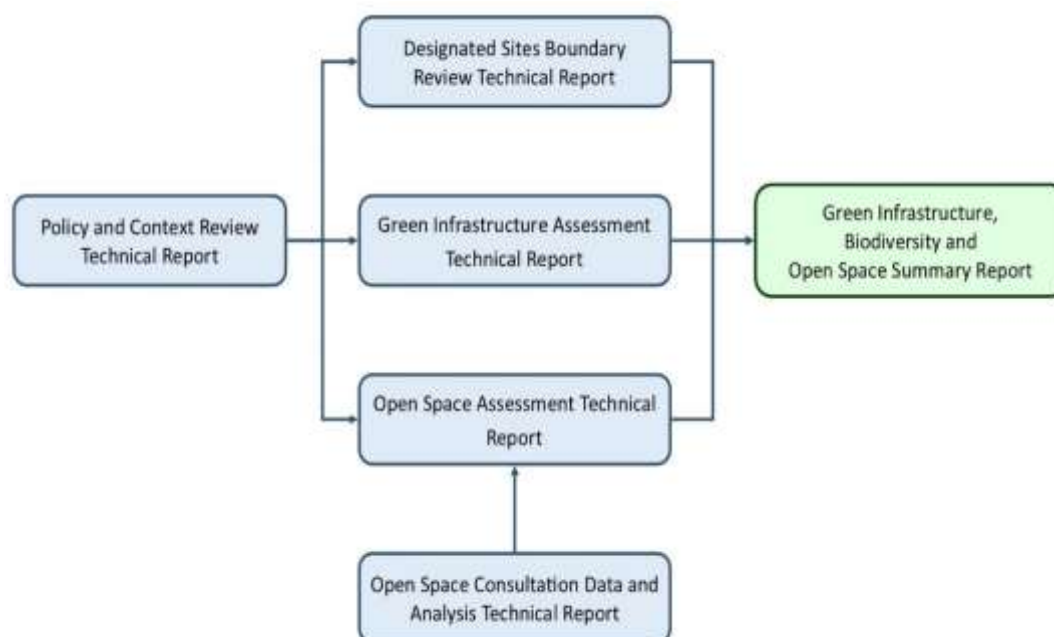


Figure 1: Report structure for Green Infrastructure, Biodiversity and Open Space Study

## 2.0 National Context

### National Planning Policy Framework (NPPF)

- 2.1 The revised National Planning Policy Framework (NPPF) was updated on 19 February 2019 and sets out the Government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous NPPF published in March 2012 and revised in July 2018. The NPPF is a material consideration in planning decisions and guides policy development in Local Plans.
- 2.2 The NPPF sets out the Government's planning policies and how these are to be applied. The NPPF requirements in relation to open space, green infrastructure and biodiversity are outlined in the following paragraphs. The previous paragraph numbers from the NPPF 2012 are also included for reference where appropriate.
- 2.3 Open space is defined in the NPPF as *"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"*.

#### Strategic Policies

- 2.4 The Strategic Policies set out an overall strategy for pattern, scale and quality of development, and make sufficient provision for *"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"* Paragraph 20 (d).

#### Chapter 2: Achieving Sustainable Development

- 2.5 Paragraph 8 sets out the three overarching objectives for sustainable development:
- Economic - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places;
  - Social - to support strong, vibrant and healthy communities through sufficient housing and accessible open spaces that reflect the current and future needs and support communities' health, social and cultural well-being; and
  - Environmental - to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity and adapting to climate change.

#### Chapter 8: Promoting Healthy and Safe Communities

- 2.6 Paragraph 91 (c) advises that planning policies and decisions should aim to achieve healthy, inclusive and safe places through the provision of safe and accessible green infrastructure, sports facilities and allotments.
- 2.7 Paragraph 92 (previously 70) of the NPPF advises that planning policies should plan positively, including for the provision and use of shared spaces and community facilities to enhance the sustainability of communities and residential environments.

- 2.8 Paragraph 93 states the social, economic and environmental benefits of estate regeneration, which should be delivered to a high standard through local planning authority planning powers.
- 2.9 Paragraph 96 (previously 73) states that access to high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities and planning policies should be based on robust and up-to-date assessments of the needs for open space and recreation facilities and opportunities for new provision.
- 2.10 Paragraph 97 states that existing open space including sports and recreational buildings and playing fields should not be built on unless an assessment has been undertaken which has clearly shown the open space is surplus to requirements; or the loss would be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreational provision.
- 2.11 Paragraph 99 (previously 76) states that local communities through local and neighbourhood plans should be able to identify green areas of particular importance to them that may warrant special protection through designation as 'Local Green Space'.

#### Chapter 9: Promoting Sustainable Transport

- 2.12 Paragraph 102 states that development proposals should provide opportunities to promote walking, cycling and public transport. Furthermore, the environmental impacts of traffic and transport infrastructure should be identified and appropriate opportunities sought to avoid these impacts and mitigate any adverse effects, and for net environmental gains.
- 2.13 Paragraph 104 (d) states that planning policies should provide for high quality walking and cycling networks. Furthermore, paragraph 110 (c) states that development proposals should create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles.

#### Chapter 11: Making Effective Use of Land

- 2.14 Chapter 11 aims to ensure that planning policies and decisions promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 2.15 Paragraph 118 (b) states that planning policies and decisions should recognise that undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage and food production.

#### Chapter 12: Achieving Well-Designed Places

- 2.16 Good design is a key aspect of sustainable development and should contribute positively to making places better for people. It is important to plan positively for the achievement of high quality, safe and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (paragraph 124 and previously 56 and 57).



- 2.17 Paragraphs 127 (e) and (f) state that planning policies should ensure developments accommodate and sustain an appropriate amount and mix of development including green and other public spaces and that places should be created which are safe, inclusive and accessible, which promote health and well-being.

Chapter 14: Meeting the challenges of Climate Change, Flooding and Coastal Change

- 2.18 The NPPF recognises the need for the planning system to support the transition to a low carbon future to tackle climate change and take account for flood risk.
- 2.19 Paragraph 149 states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long term implications for flood risk, biodiversity and landscapes.
- 2.20 Paragraph 150 states that new development should be planned for in ways that avoid increased vulnerability from climate change, through implementing measures such as green infrastructure.

Chapter 15: Conserving and Enhancing the Natural Environment

- 2.21 Paragraph 170 (previously 109 and 111) of the NPPF states that the planning system has a role to contribute to and enhance the natural and local environment. Valued landscapes and ecosystems should be protected, with development prevented from adversely affecting soil, air or water, or from causing noise pollution and land instability.
- 2.22 Paragraph 171 states that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- 2.23 The NPPF states in paragraph 174 (previously 113 and 114) that local planning authorities should plan to protect and enhance biodiversity and geodiversity. This should be achieved through identifying and mapping local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them. Furthermore, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 2.24 When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles (paragraph 175):
- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
  - development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in



combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

2.25 Paragraph 181 of the NPPF states that there are opportunities to improve air quality or mitigate impacts of pollution through the provision and enhancement of green infrastructure.

### **Planning Practice Guidance (PPG)**

2.26 The National Planning Practice Guidance (NPPG) adds further context to the NPPF and must be read together with the NPPF.

#### Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space (March 2014)

2.27 Planning Practice Guidance sets out key advice on open space, sports and recreation facilities, public rights of way and the new Local Green Space designation.

2.28 Public Rights of Way (PRoW) are an important part of sustainable transport links and should be protected and enhanced.

### **Promoting Healthy Cities (Royal Town Planning Institute)**

2.29 The Royal Town Planning Institute (RTPI) published Promoting Healthy Cities<sup>1</sup>, a document tackling the role of planning in creating healthy cities in October 2014.

2.30 The report calls for the UK to develop more integrated strategies for healthy place making, gather greater intelligence on the social and economic determinants of health and reform and strengthen institutions to ensure integration of health policies. This process should involve a range of professions and community stakeholders.

### **Green Infrastructure Strategies (Natural England)**

2.31 A Green Infrastructure Strategies document<sup>2</sup> was published by Natural England in October 2014 to provide guidance on:

- Why we need green infrastructure;
- What green infrastructure should achieve;
- What green infrastructure is; and

<sup>1</sup> [https://www.rtpi.org.uk/media/1119674/rtpi\\_promoting\\_healthy\\_cities.pdf](https://www.rtpi.org.uk/media/1119674/rtpi_promoting_healthy_cities.pdf)

<sup>2</sup> <http://publications.naturalengland.org.uk/publication/35033>

- Green infrastructure strategies.

2.32 Natural England states that green infrastructure:-

*"Contributes so much to the setting and quality of people's living and working environments, and its role in generating economic benefit has often been overlooked".*

2.33 Natural England states that *"policies and decisions on development proposals should conserve and enhance environmental assets"*. Consideration should be made to providing off road, green routes for walkers and cyclists, and consider privately owned land, which provides connectivity for wildlife, and helps tackle climate change and flooding.

## 3.0 Regional Context

### Current London Plan (2016)

- 3.1 The London Borough of Merton is within the Greater London Authority (GLA). The GLA and the Mayor of London have produced a spatial development strategy known as the London Plan (2016). Boroughs' local development documents have to be 'in general conformity' with the London Plan, which is also legally part of the development plan that has to be taken into account when planning decisions are taken in any part of London unless there are planning reasons why it should not.
- 3.2 The London Plan is an overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 3.3 The London Plan provides policies of a strategic importance for Greater London, with a focus on three main themes.
- Economic development and wealth creation;
  - Social development; and
  - Improvements of the environment.
- 3.4 The current London Plan (2016) defines open space as *"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"*. The definition of open space remains the same in the draft new London Plan (2018).

### New draft London Plan (2018)

- 3.5 The new London Plan<sup>3</sup> will run from 2020-2041 replacing the current adopted London Plan (2016). Once adopted it will replace the previous London Plan and become the spatial strategic plan for London. It will be a replacement, not an alteration or update to previous London Plans.
- 3.6 In July 2017, the Mayor of London published a new draft London Plan to replace the current London Plan (2016). In December 2017, the Mayor held a 3 month public consultation on the draft plan. The current London Plan (2016) is still the Development Plan for London, with the draft Plan being a material consideration in determining planning decisions.
- 3.7 In August 2018, the Mayor published a version of the draft London Plan that includes his minor suggested changes. The suggested changes are informed by a review of consultation responses; consist of clarifications, corrections and factual updates to the draft plan that will help inform the EiP.

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<sup>3</sup> [https://www.london.gov.uk/sites/default/files/draft\\_london\\_plan\\_-\\_showing\\_minor\\_suggested\\_changes\\_july\\_2018.pdf](https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf)

3.8 At the time of writing this document, the draft London Plan was at the Examination in Public (EiP) stage (January – May 2019). Led by an independent planning inspector appointed by the Secretary of State, who will consider whether or not it is 'sound', If found to be 'sound' the draft plan will be adopted and will therefore become the spatial development plan for London. London Plan Policies and Supplementary Planning Guidance.

### London Plan Policies and Supplementary Planning Guidance

3.9 The following section sets out relevant planning policies from the London Plan (2016) and Supplementary Planning Guidance (SPG) documents. It is structured to align with the London Plan chapters and policies, but also includes extracts from the draft new London Plan (using the Minor Suggested Changes version, August 2018) to demonstrate emerging policy. Where policies are included in tables for reference, only the relevant sections of the policies have been included in some instances rather than the full policy.

#### London Plan Chapter 1 Context and Strategy

3.10 London Plan Policy 1.1 states that growth will be supported where the development does not encroach on the Green Belt or London's protected open spaces, and does not have an unacceptable impact on the environment. Merton has no Green Belt, but does have protected open spaces.

3.11 Policy G3 (paragraph 8.3.2) of the new London Plan (2018) states "the principles of national Green Belt policy also apply to MOL. Any proposed changes to MOL boundaries which result in loss must be accompanied by thorough evidence which demonstrates that there are exception circumstances, as set out in the NPPF. The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy".

*Table 1: London Plan 2016 - 1.1 Delivering the Strategic Vision and Objectives*

Reference	Policy
Chapter 1 Context and Strategy  Policy 1.1	<p><b>Delivering the Strategic Vision and Objectives for London</b></p> <p>B. Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without:</p> <p>a) encroaching on the Green Belt, or on London's protected open spaces</p> <p>b) having unacceptable impacts on the environment</p>

3.12 The draft new London Plan (2018) Chapter 1 'Planning London's Future' covers six 'Good Growth Policies'. These are:

- Policy GG1 Building strong and inclusive communities;
- Policy GG2 Making the best use of land;
- Policy GG3 Creating a healthy city;

- Policy GG4 Delivering the homes Londoners need;
- Policy GG5 Growing a good economy; and
- Policy GG6 Increasing efficiency and resilience.

3.13 All of these policies are broadly relatable to green infrastructure, open space and biodiversity, but in particular GG2 'Making the best use of land' paragraph 1.2.6 states: *Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50 per cent green cover across London, will be important to help London become a National Park City.*

Table 2: Draft New London Plan 2018 - GG2 Making the Best Use of Land

Reference	Policy
Chapter 1 Planning London's Future Policy GG2	<p><b>Making the Best Use of Land</b></p> <p>To create successful high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>D. Protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.</p>

3.14 Also of relevance is Good Growth Policy GG3 'Creating a healthy city' paragraph 1.3.3 states: *Access to green and open spaces, including waterways, can improve health, but access and quality varies widely across the city.* Merton's Health and Wellbeing Strategy 2015-2018 promotes the use of open space to facilitate healthy lifestyles.

Table 3: Draft New London Plan 2018 - GG3 Creating a Healthy City

Reference	Policy
Chapter 1 Planning London's Future Policy GG3	<p><b>Creating a Healthy City</b></p> <p>To improve Londoners' health and reduce health inequalities, those involved in planning and development must:</p> <p>E. Plan for improved access to and quality of green spaces, and the provision of new green infrastructure, and spaces for play, recreation and sports.</p>

3.15 The Merton Green Infrastructure, Biodiversity and Open Space Study will provide up to date baseline information and mapping of all open spaces, sites for biodiversity, and green infrastructure in Merton. This will form part of the Open Space Assessment and Green and Blue Infrastructure Technical Reports.

London Plan Chapter 2 London's Places

- 3.16 The policies in this chapter set the overall spatial context and policy including ensuring that London is a city that becomes a world leader in improving the environment.
- 3.17 London Plan Policy 2.18 highlights the strategic opportunities to enhance the current green infrastructure opportunities of the Wandle Valley and encourage further green infrastructure and areas of nature conservation. The River Wandle and Wandle Valley Regional Park runs through Merton and provides several recreation and nature conservation opportunities; including the Wandle Trail, Wandle Meadow Nature Park and Morden Hall Park.

*Table 4: London Plan 2016 - 2.18 Green Infrastructure*

Reference	Policy
<p>Chapter 2                      London's                      Places                       Policy 2.18</p>	<p><b>Green Infrastructure: The Multi-Functional Network of Green and Open Spaces</b></p> <p><b>Strategic</b></p> <p>A. The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London’s network of green infrastructure. This multifunctional network will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.</p> <p>B. The Mayor will pursue the delivery of green infrastructure by working in partnership with all relevant bodies, including across London’s boundaries, as with the Green Arc Partnerships and Lee Valley Regional Park Authority. The Mayor has published supplementary guidance on the All London Green Grid to set out the strategic objectives and priorities for green infrastructure across London.</p> <p>C. In areas of deficiency for regional and metropolitan parks, opportunities for the creation of green infrastructure to help address this deficiency should be identified and their implementation should be supported, such as in the Wandle Valley Regional Park (EDAW Ltd London Strategic Parks Projects, GLA, 2004).</p> <p><b>Planning Decisions</b></p> <p>D. Enhancements to London’s green infrastructure should be sought from development and where a proposal falls within a regional or metropolitan park deficiency area (broadly corresponding to the areas identified as “regional park</p>

	<p>opportunities” on Map 2.8), it should contribute to addressing this need.</p> <p>E. Development proposals should:</p> <p>a) incorporate appropriate elements of green infrastructure that are integrated into the wider network</p> <p>b) encourage the linkage of green infrastructure including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening (Policy 5.10)</p> <p><b>LDF Preparation</b></p> <p>F. Boroughs should:</p> <p>a) set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure by producing green infrastructure strategies that cover all forms of green and open space and the interrelationship between these spaces. These should identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space. Delivery of local biodiversity action plans should be linked to these strategies.</p> <p>b) ensure that in and through DPD policies, green infrastructure needs are planned and managed to realise the current and potential value of these to communities and to support delivery of the widest range of linked environmental and social benefits.</p> <p>c) in London’s urban fringe support, through appropriate initiatives, the vision of creating and protecting an extensive and valued recreational landscape of well-connected and accessible.</p>
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3.18 The draft new London Plan Chapter 8, Policy G1 acknowledges that green (and blue) infrastructure meets multiple objectives including: mental and physical health; the heat island effect; air and water quality; landscape and heritage conservation; learning about the environment; alongside traditional functions such as space for play, sports and recreation. Green infrastructure should be an integral element of development, and not an ad on. Economic and social value should be recognised as highlighted in the London i-Tree Assessment<sup>4</sup> and Natural Capital Account for London's Public Parks<sup>5</sup>.

3.19 To help make more than half of London at least 50 per cent green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid (London’s strategic green infrastructure framework) to provide guidance on the strategic green infrastructure network and the preparation of green infrastructure strategies.

<sup>4</sup> <https://www.forestry.gov.uk/london-itree>

<sup>5</sup> <https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/green-infrastructure/natural-capital-account-london?source=vanityurl>



Table 5: Draft New London Plan 2018 - G1 Green Infrastructure

Reference	Policy
Chapter 8 Green Infrastructure and Natural Environment Policy G1	<p><b>Green Infrastructure</b></p> <p>A. London’s network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.</p> <p>B. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration to ensure green infrastructure is optimised.</p> <p>C. Development Plans and Opportunity Area Planning Frameworks should:</p> <ol style="list-style-type: none"> <li>1) identify key green infrastructure assets, their function and their potential function.</li> <li>2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.</li> </ol> <p>CA. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s network of green open spaces.</p>

3.20 The Merton Green Infrastructure, Biodiversity and Open Space Study will review existing green infrastructure in Merton and provide recommendations to protect, promote, and manage it. Recommendations will aim to increase the social, environmental and economic benefits of green infrastructure. This will form part of the Green and Blue Infrastructure Technical Report.

London Plan Chapter 3 London's People

3.21 This chapter sets policies to enable the planning system to deliver equal life chances for all Londoners by reducing health inequalities, supporting social infrastructure provision such as health, education and sports facilities and creating genuinely sustainable neighbourhoods.

3.22 London Plan Policy 3.6 states that all children and young people should have access to good quality, well designed, secure and stimulating play and informal recreation provisions. Boroughs should undertake audits of existing play and informal recreation provision to assess need in their areas and produce a strategy.

Table 6: London Plan 2016 - 3.6 Children and Young People's Play and Recreation

Reference	Policy
<p>Chapter 3                      London's                      People                      Policy 3.6</p>	<p><b>Children and Young People's Play and Informal Recreation Facilities</b></p> <p><b>Strategic</b></p> <p>A. The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.</p> <p><b>Planning Decisions</b></p> <p>B. Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation sets out guidance to assist in this process.</p> <p><b>LDF Preparation</b></p> <p>C. Boroughs should:</p> <p>a) undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities.</p> <p>b) Produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.</p>

3.23 The draft new London Plan, Chapter 5, Policy S4 also states that Boroughs should undertake audits of existing children and young person's play and informal recreation provisions, which will be used to produce strategies to address identified need. Policy S4 also provides new policy to include integrated, multifunctional and accessible play spaces in new developments.

Table 7: Draft New London Plan 2018 - S4 Play and Informal Recreation

Reference	Policy
<p>Chapter 5 Social Infrastructure Policy S4</p>	<p>A. Boroughs should:</p> <ol style="list-style-type: none"> <li>1) undertake audits of existing children and young person’s play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision</li> <li>2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.</li> </ol> <p>B. Development proposals for schemes that are likely to be used by children and young people should:</p> <ol style="list-style-type: none"> <li>1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile</li> <li>2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:                     <ol style="list-style-type: none"> <li>a) provides a stimulating environment</li> <li>b) can be accessed safely from the street by children and young people independently</li> <li>c) forms an integral part of the surrounding neighbourhood</li> <li>d) incorporates trees and/or other forms of greenery.</li> </ol> </li> <li>3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently</li> <li>4) for large-scale public realm developments, incorporate incidental play space to make the space more playable</li> <li>5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough’s play and informal recreation strategy should be used to identify ongoing or future demand for play provision.</li> </ol>

3.24 As part of the Merton Green Infrastructure, Biodiversity and Open Space Study there will be surveys of existing areas of play and informal recreation. The survey will assess the quantity, quality and accessibility of play and informal recreation facilities. Recommendations for improvements and gaps in provision or accessibility will be provided, which will inform the emerging Local Plan. This will form part of the Open Space Assessment Technical Report.

London Plan Chapter 5 London's Response to Climate Change

- 3.25 This chapter sets out policies to underpin London's response to climate change. The challenge of climate change is a theme that runs through the London Plan and is central to the economic, social and environmental dimensions of sustainable development.
- 3.26 London Plan, Policy 5.10 promotes and supports 'urban greening' of streets, squares and plaza's to help tackle the effects of climate change. Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change.

*Table 8: London Plan 2016 - 5.10 Urban Greening*

Reference	Policy
Chapter 5: London's Response to Climate Change  Policy 5.10	<p><b>Urban Greening</b></p> <p><b>Strategic</b></p> <p>A. The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.</p> <p><b>Planning Decisions</b></p> <p>C. Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping.</p> <p><b>LDF Preparation</b></p> <p>D. Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change, such as the urban heat island.</p>

- 3.27 The draft new London Plan, Chapter 8, Policy G5 'Urban Greening' builds on the policy set out in the adopted London Plan by stating that urban greening should be a fundamental element of the site and building design. Policy G5 also states that Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening require for new developments.

*Table 9: Draft New London Plan 2018 - G5 Urban Greening*

Reference	Policy
Chapter 8 Policy G5 Urban Greening	<p>A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.</p> <p>B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.</p> <p>BA. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.</p>

3.28 The Green Infrastructure, Biodiversity and Open Space Study will map existing areas of green infrastructure and identify opportunities to enhance and expand existing provision including recommendations to mitigate against the effects of climate change. This will form part of the Green and Blue Infrastructure Technical Report.

London Plan Chapter 7 London's Living Spaces and Places

3.29 This chapter focuses on a broad range of policies, which impact directly on how people perceive and use places and spaces. Chapter 7 aims to make the most of London's wealth of green spaces, natural environment and waterways, realising its potential for improving Londoners' health, wealth and development.

3.30 London Plan, Policy 7.1 states that people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhood principles. Paragraph 7.4(a) states that the three principles for lifetime neighbourhoods are:

- Can get around - neighbourhoods which are well-connected and walkable;
- As far as possible, can have a choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and
- Belong to a cohesive communication which fosters diversity, interaction and social capital.

3.31 Paragraph 7.4 also states "*lifetime neighbourhoods promote safe, healthy, supportive and inclusive neighbourhoods where people live*" and "*residents should have safe and easy access to a network of open and green spaces that meet their recreational needs to enhance their health and wellbeing*".

3.32 The new draft London Plan (2018) does not include the 'lifetime neighbourhoods' in the planning policy. However the new draft London Plan aims to ensure 'Good Growth' through six good growth policies, including Policy GG1 Building strong and inclusive communities and GG3 Creating a healthy city.

Table 10: London Plan 2016 - 7.1 Lifetime Neighbourhoods

Reference	Policy
<p>Chapter 7: London's Living Spaces and Places  Policy 7.1</p>	<p><b>Lifetime Neighbourhoods</b></p> <p><b>Strategic</b></p> <p>A. In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles.</p> <p><b>Planning Decisions</b></p> <p>B. Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport.</p> <p>C. Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods.</p> <p>D. The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.</p> <p>E. The policies in this chapter provide the context within which the targets set out in other chapters of this Plan should be met.</p> <p><b>LDF Preparation</b></p> <p>F. Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.</p> <p>G. Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms.</p>

- 3.33 The Green Infrastructure, Biodiversity and Open Space Study will survey the existing open space network in Merton and provide recommendations to enhance quality, safety and accessibility to open space and green infrastructure. It will also identify any surplus or deficiency in open spaces to ensure future population increases are taken into consideration. This will form part of the Open Space Assessment Technical Report and Green and Blue Infrastructure Assessment.

*Table 11: London Plan 2016 - Policy 7.8 Heritage Assets and Archaeology*

Reference	Policy
Chapter 7: London's Living Spaces and Places  Policy 7.8	<p><b>Heritage Assets and Archaeology</b></p> <p><b>Strategic</b></p> <p>A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.</p> <p><b>Planning Decisions</b></p> <p>C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.</p> <p>D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.</p> <p>E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials.</p>

- 3.34 The draft new London Plan, Chapter 7, Policy HC1 states that Boroughs should develop evidence that demonstrates a clear understanding of London's historic environment. Paragraph 7.1.2 states that "*London's diverse range of designated and non-designated heritage assets contributes to its status as a world-class city*".



Table 11: Draft New London Plan 2018 - HC1 Heritage conservation and growth

Reference	Policy
<p>Chapter 7                      Policy HC1                      Heritage conservation and growth</p>	<p>A. Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.</p> <p>B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:</p> <ol style="list-style-type: none"> <li>1) setting out a clear vision that recognises and embeds the role of heritage in place-making</li> <li>2) utilising the heritage significance of a site or area in the planning and design process</li> <li>3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place</li> <li>4) delivering positive benefits that sustain conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.</li> </ol>

Reference	Policy
	<p>C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.</p> <p>D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.</p> <p>E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.</p>

3.35 The Green Infrastructure, Biodiversity and Open Space Study will include auditing Merton's Historic Parks and Gardens. This will form part of the Open Space Assessment Technical Report.

Table 12: London Plan 2016 - 7.17 Metropolitan Open Land

Reference	Policy
<p>Chapter 7:                      London's                      Living                      Spaces and                      Places                      Policy 7.17</p>	<p><b>Metropolitan Open Land (MOL)</b></p> <p><b>Strategic</b></p> <p>A. The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL.</p> <p><b>Planning Decisions</b></p> <p>B. The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.</p> <p><b>LDF Preparation</b></p> <p>C. Any alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities.</p> <p>D. To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:</p> <ul style="list-style-type: none"> <li>a) it contributes to the physical structure of London by being clearly distinguishable from the built up area</li> <li>b) 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</li> <li>c) it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value</li> <li>d) it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria</li> </ul>

- 3.36 Metropolitan Open Land (MOL) has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. MOL is designated to protect areas of landscape, recreation, nature conservation and scientific interest, which are strategically important.
- 3.37 London Plan, Policy 7.17 states that MOL is given the strongest protection and inappropriate development should be refused. Any alterations of a MOL boundary should be undertaken by boroughs through their Local Plans .

3.38 The draft new London Plan, Chapter 8, Policy G3 continues to restrict development on MOL using the same principles as national Green Belt policy. However Policy G3 states that the overall quantum of MOL should not be reduced, and the value of the land designated as MOL should be improved. There is also additional detail regarding strategic corridors, nodes and links in the green infrastructure network.

*Table 13: Draft New London Plan 2018- G3 Metropolitan Open Land*

Reference	Policy
<p>Chapter 8                      Policy G3                      Metropolitan                      Open Land</p>	<p>A. Metropolitan Open Land (MOL) should be protected from inappropriate development:</p> <ol style="list-style-type: none"> <li>1) development proposals that would harm MOL should be refused</li> <li>2) boroughs should work with partners to enhance the quality and range of uses of MOL.</li> </ol> <p>AA. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:</p> <ol style="list-style-type: none"> <li>1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area</li> <li>2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</li> <li>3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value</li> <li>4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.</li> </ol> <p>B. The extension of MOL designations should be supported where appropriate.</p> <p>C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs; ensuring that the overall quantum of MOL is not reduced, and that the value of the land designated as MOL is improved, having regard to all of the criteria in Part B.</p>

3.39 As part of the Green Infrastructure, Biodiversity and Open Space Study MOL will be surveyed and recommendations for any boundary changes will be made to inform Merton's emerging Local Plan. This will form part of the Designated Sites Boundary Review Technical Report.

Table 14: London Plan 2016 - 7.18 Protecting Open Space and Addressing Deficiency

Reference	Policy
<p>Chapter 7:                      London's                      Living                      Spaces and                      Places</p> <p>Policy 7.18</p>	<p><b>Protecting Open Space and Addressing Deficiency</b></p> <p><b>Strategic</b></p> <p>A. The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.</p> <p><b>Planning Decisions</b></p> <p>B. The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.</p> <p><b>LDF Preparation</b></p> <p>C. When assessing local open space needs LDFs should:</p> <ul style="list-style-type: none"> <li>a) include appropriate designations and policies for the protection open space to address deficiencies</li> <li>b) identify areas of open space deficiency, using the open space categorisation [Table 7.2 of the London Plan] as a benchmark for all the different types of open space identified therein</li> <li>c) ensure that future publically accessible open space needs are planned for in areas with the potential for substantial change such as opportunity areas, regeneration areas, intensification areas and other local areas</li> <li>d) ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits</li> </ul> <p>D. Boroughs should undertake audits of all forms of open space and assessments of need. These should be both qualitative and quantitative, and have regard to the cross-borough nature and use of many of these open spaces</p>

<b>Table 7.2 Public open space categorisation</b>		
<b>Open Space categorisation</b>	<b>Size Guide-line</b>	<b>Distances from homes</b>
<b>Regional Parks</b> Large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. Offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.	400 hectares	3.2 to 8 kilometres
<b>Metropolitan Parks</b> Large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards.	60 hectares	3.2 kilometres
<b>District Parks</b> Large areas of open space that provide a landscape setting with a variety of natural features providing a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits.	20 hectares	1.2 kilometres
<b>Local Parks and Open Spaces</b> Providing for court games, children's play, sitting out areas and nature conservation areas.	2 hectares	400 metres
<b>Small Open Spaces</b> Gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas.	Under 2 hectares	Less than 400 metres
<b>Pocket Parks</b> Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.	Under 0.4	Less than 400 metres
<b>Linear Open Spaces</b> Open spaces and towpaths alongside the Thames, canals and other waterways; paths, disused railways; nature conservation areas; and other routes that provide opportunities for informal recreation. Often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space.	Variable	Wherever feasible

Figure 2: London Plan 2016 - Public Open Space Categorisation

3.40 London Plan, Policy 7.18 states that the creation of new open space in London will be supported and loss of protected open spaces will be resisted. Boroughs should include appropriate designations and policies within their Development Plan to address identified deficiencies in their area. Draft new London Plan, Chapter 8; Policy G4 continues to highlight the need for boroughs to undertake needs assessment of local green and open spaces. Policy G4 continues to promote the creation of new publically accessible open space and resist the loss of protected open spaces.

Table 15: Draft New London Plan 2018 - G4 Open Space

Reference	Policy
<p>Chapter 8                      Policy G4                      Open Space</p>	<p>AA Development Plans should:</p> <p>1A) undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.</p> <p>1B) Promote the creation of new publicly-accessible open space particularly green space, ensuring that future open space needs are planned for in areas with the potential for substantial change.</p> <p>1C) ensure that secured open space, particularly green space remains publically accessible.</p> <p>AB Development proposals should:</p> <p>1) where possible create areas of publically accessible open space, particularly in areas of deficiency.</p> <p>1A) resist the loss of protected green space in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment areas unless an up-to-date needs assessment demonstrates this is unnecessary.</p>



Table 8.1 - Public open space categorisation

Open Space categorisation	Description	Size guideline	Distance from homes
Regional Parks	These are large areas, corridors or networks of open space, the majority of which will be publicly-accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. They offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.	400 ha	3.2 to 8 km
Metropolitan Parks	These are large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level. They are readily accessible by public transport and are managed to meet best practice quality standards.	60 ha	3.2 km
District Parks	These are large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits.	20 ha	1.2 km
Local Parks and Open Spaces	These provide for court games, children's play, sitting out areas and nature conservation areas.	2 ha	400 m
Small Open Spaces	These include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas.	under 2 ha	less than 400 m
Pocket Parks	These are small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.	under 0.4 ha	less than 400 m
Linear Open Spaces	These are open spaces and towpaths alongside the Thames, canals and other waterways, paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They are often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space.		

Figure 3: New London Plan (2018) - Public Open Space categorisation

3.41 The Green Infrastructure, Biodiversity and Open Space Study will include a survey of all open space provision in Merton. Open space will be assessed for quantity, quality and accessibility. This will form part of the Open Space Assessment Technical Report.

Table 16: London Plan 2016 - 7.19 Biodiversity and Access to Nature

Reference	Policy
<p>Chapter 7:                      London's                      Living                      Spaces and                      Places</p>	<p><b>Biodiversity and Access to Nature</b></p> <p><b>Strategic</b></p> <p>A. The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.</p> <p>B. Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects.</p>
<p>Policy 7.19</p>	<p><b>Planning Decisions</b></p> <p>C. Development Proposals should:</p> <p>a) wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity</p> <p>b) prioritise assisting in achieving targets in biodiversity action plans (BAPs), and/or improving access to nature in areas deficient in accessible wildlife sites</p> <p>c) not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.</p>

Reference	Policy
	<p>D. On Sites of Importance for Nature Conservation development proposals should:</p> <ul style="list-style-type: none"> <li>a) give the highest protection to sites with existing or proposed international designations (SACs, SPAs, Ramsar sites) and national designations (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations</li> <li>b) give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance</li> <li>c) give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.</li> </ul> <p>E. When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:</p> <ol style="list-style-type: none"> <li>1. avoid adverse impact to the biodiversity interest</li> <li>2. minimize impact and seek mitigation</li> <li>3. only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.</li> </ol>
	<p><b>LDF Preparation</b></p> <p>F. In their LDFs, Boroughs should:</p> <ul style="list-style-type: none"> <li>a) use the procedures in the Mayor’s Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.</li> <li>b) identify areas deficient in accessible wildlife sites and seek opportunities to address them</li> <li>c) include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets</li> <li>d) ensure sites of European or National Nature Conservation Importance are clearly identified</li> <li>e) identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.</li> </ul>

3.42 London Plan, Policy 7.19 states that there should be a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in line with the Mayor’s Biodiversity Strategy (2002). Furthermore boroughs should identify, protect and enhance corridors of movement, such as green corridors.

3.43 The draft new London Plan, Chapter 8, Policy G6 continues to provide protection to sites designated for biodiversity. However Policy G6 provides additional protection to Sites of Importance for Nature Conservation (SINC) and provides more information for boroughs on Development Plan policies, for example identifying areas of deficiency to nature (1km walking distance).

*Table 17: Draft New London Plan 2018 - G6 Biodiversity and Access to Nature*

Reference	Policy
<p>Chapter 8                      Policy G6                      Biodiversity and access to nature</p>	<p>A. Sites of Importance for Nature Conservation (SINCs) should be protected.</p> <p>B. In developing Development Plan policies, boroughs should:</p> <ol style="list-style-type: none"> <li>1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks.</li> <li>2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them.</li> <li>3) support the protection and conservation of priority species and habitats that sit outside of the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans.</li> <li>4) opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.</li> <li>5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.</li> </ol>

Reference	Policy
	<p>BA. Where harm to a European Site is unavoidable, a proposal must demonstrate that there are no alternatives and that there are Imperative Reasons of Overriding Public Interest (IROPI).</p> <p>C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:</p> <ol style="list-style-type: none"> <li>1) avoid damaging to the significant ecological features of the site.</li> <li>2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site</li> <li>3) seek appropriate compensation off-site based on biodiversity offsets, or other appropriate metric</li> </ol> <p>D. Development proposals should aim to secure net biodiversity gain and be informed by the best available ecological information which should be considered from the start of the development process.</p> <p>E. Proposals which reduce deficiencies in access to wildlife sites should be considered positively.</p>

- 3.44 SINC's within Merton will be surveyed as part of the Green Infrastructure, Biodiversity and Open Space Study. This will form part of the Designated Sites Boundary Review Technical Report.
- 3.45 London Plan, Policy 7.21 sets out policy for the protection, maintenance and enhancement of trees and woodlands in London.

Table 18: London Plan 2016 - 7.21 Trees and Woodland

Reference	Policy
<p>Chapter 7:                      London's                      Living                      Spaces and                      Places                      Policy 7.21</p>	<p><b>Trees and Woodland</b></p> <p><b>Strategic</b></p> <p>A. Trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework (or any successor strategy). In collaboration with the Forestry Commission the Mayor has produced supplementary guidance on Tree Strategies to guide each borough's production of a Tree Strategy covering the audit, protection, planting and management of trees and woodland. This should be linked to a green infrastructure strategy.</p> <p><b>Planning Decisions</b></p> <p>B. Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.</p> <p><b>LDF Preparation</b></p> <p>C. Boroughs should follow the advice of paragraph 118 of the NPPF to protect 'veteran' trees and ancient woodland where these are not already part of a protected site.</p> <p>D. Boroughs should develop appropriate policies to implement their borough tree strategy</p>

3.46 The draft new London Plan, Chapter 19, G7 builds on the aims of the current London Plan, Policy 7.21 by encouraging the creation of canopies of trees and urban forests, which are multifunctional.

Table 19: Draft New London Plan 2018 - G7 Trees and Woodland

Reference	Policy
<p>Chapter 19                      Policy G7                      Trees and                      woodland</p>	<p>A. London’s urban forest and woodlands should be protected, and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London’s urban forest – the area of London under the canopy of trees.</p> <p>B In their Development Plans, boroughs should:</p> <ol style="list-style-type: none"> <li>1) protect ‘veteran’ trees and ancient woodland where these are not already part of a protected site</li> <li>2) identify opportunities for tree planting in strategic locations.</li> </ol> <p>C Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or other appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.</p>

- 3.47 Trees and woodland have a key role in open spaces, green infrastructure and biodiversity. Trees and woodland also have a crucial role in the resilience to climate change and flooding.
- 3.48 Woodland and trees form an important part of biodiversity network and green infrastructure in Merton. The Green Infrastructure, Biodiversity and Open Space Study will not survey the quality or status of trees within open spaces, but they will form part of the assessment of the overall quality of open spaces and their provision to support biodiversity. When looking at recommendations for improving and enhancing opportunities for open spaces and green infrastructure, tree planting is a consideration.



Table 20: London Plan 2016 - 7.22 Land for Food

Reference	Policy
Chapter 7: London's Living Spaces and Places  Policy 7.22	<p><b>Land for Food</b></p> <p><b>Strategic</b></p> <p>A The Mayor will seek to encourage and support thriving farming and land-based sectors in London, particularly in the Green Belt.</p> <p>B Use of land for growing food will be encouraged nearer to urban communities via such mechanisms as 'Capital Growth'.</p> <p><b>LDF Preparation</b></p> <p>C Boroughs should protect existing allotments. They should identify other potential spaces that could be used for commercial food production or for community gardening, including for allotments and orchards.</p>

- 3.49 London Plan, Policy 7.22 seeks to encourage and support farming and boroughs should protect existing allotments and identify potential sites for food production and community gardens.
- 3.50 Allotments provide a valuable outdoor leisure opportunity for residents living in an urban environment. London Plan, paragraph 7.66 states that food growing "*promotes more active lifestyles, better diets, food security and social benefits*".
- 3.51 The draft new London Plan, Chapter 8, Policy G8 continues to protect the provision of allotments and areas for community gardens through Development Plans however; it also encourages the use of vacant or underutilised sites for food growing. Paragraph 8.8.1 highlights some of the key benefits of food growing at a local level, which includes active lifestyles, better diet, social integration, community cohesion and improved mental and physical health and wellbeing.

Table 21: Draft New London Plan 2018 - G8 Food Growing

Reference	Policy
Chapter 8 Policy G8 Food Growing	<p><b>Food Growing</b></p> <p>A In Development Plans, boroughs should:</p> <ol style="list-style-type: none"> <li>1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments or as a meanwhile use on vacant or under-utilised sites</li> <li>2) identify potential sites that could be used for commercial food production.</li> </ol>

- 3.52 All allotments, city farms, community gardens and orchards form part of the quantity, quality and accessibility assessment. This will form part of the Open Space Assessment Technical Report.
- 3.53 London Plan, Policy 7.24, 7.28 and 7.30 states that the Blue Ribbon Network is London's strategic network of waterspaces, covering the River Thames, canals, tributary rivers, lakes, reservoirs and docks. The Blue Ribbon Network should be restored and enhanced and where development is proposed along the Blue Ribbon Network the local character and accessibility should be taken into consideration.

*Table 22: London Plan 2016 - 7.24 Blue Ribbon Network*

Reference	Policy
Chapter 7: London's Living Spaces and Places  Policy 7.24	<p><b>Blue Ribbon Network</b></p> <p><b>Strategic</b></p> <p>A. The Blue Ribbon Network is a strategically important series of linked spaces. It should contribute to the overall quality and sustainability of London by prioritising uses of the waterspace and land alongside it safely for water related purposes, in particular for passenger and freight transport. Regard should be paid to the Thames River Basin Management Plan and the emerging marine planning regime and the Marine Policy Statement.</p>

Table 23: London Plan 2016 - 7.28 Restoration of the Blue Ribbon Network

Reference	Policy
<p>Chapter 7:                      London's                      Living                      Spaces and                      Places                      Policy 7.28</p>	<p><b>Restoration of the Blue Ribbon Network</b></p> <p><b>Planning decisions</b></p> <p>A. Development proposals should restore and enhance the Blue Ribbon Network by:</p> <ul style="list-style-type: none"> <li>a taking opportunities to open culverts and naturalise river channels</li> <li>b increasing habitat value. Development which reduces biodiversity should be refused</li> <li>c preventing development and structures into the water space unless it serves a water related purpose (see paragraph 7.84).</li> <li>d protecting the value of the foreshore of the Thames and tidal rivers</li> <li>e resisting the impounding of rivers</li> <li>f protecting the open character of the Blue Ribbon Network.</li> </ul> <p><b>LDF preparation</b></p> <p>B. Within LDFs boroughs should identify any parts of the Blue Ribbon Network where particular biodiversity improvements will be sought, having reference to the London River Restoration Action Plan (see London Plan, paragraph 7.86).</p>

Table 24: London Plan 2016 - 7.30 Canals and Other Rivers and Waterspaces

Reference	Policy
<p>Chapter 7:                      London's                      Living                      Spaces and                      Places                      Policy 7.30</p>	<p><b>London's Canals and Other Rivers and Waterspaces</b></p> <p><b>Planning Decisions</b></p> <p>A. Development proposals along London's canal network and other rivers and waterspace (such as reservoirs, lakes and ponds) should respect their local character and contribute to their accessibility and active water related uses, in particular transport uses, where these are possible.</p> <p><b>LDF Preparation</b></p> <p>C. Within LDFs boroughs should identify any local opportunities for increasing the local distinctiveness and use of their parts of the Blue Ribbon Network</p>

- 3.54 The draft new London Plan, Chapter 9, Policy SI14 will replace 'Blue Ribbon Network' policy in the adopted London Plan. Paragraph 9.14.1 states that *"the term 'waterways' does not only refer to the River Thames, its tributary rivers and canals, but also to other water spaces including docks, lakes and reservoirs. This network of linked waterways - also known as the Blue Ribbon Network - is of strategic importance for London. Every London borough contains some waterways"*.
- 3.55 Furthermore the draft new London Plan, paragraph 9.14.2 states that *"London's waterways are multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and as well as drainage, flood and water management and urban cooling functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners"*.

Table 25: Draft New London Plan 2018 - SI14 Waterways

Reference	Policy
Chapter 9 Policy SI14 Waterways - strategic role	<p>A To ensure coordination and alignment at the interface between terrestrial and marine planning, Development Plans and development proposals should take account of the emerging Marine Spatial Plans prepared by the Marine Management Organisation.</p> <p>B To reflect the distinctiveness of areas that specifically relate to the River Thames, relevant Development Plans should designate, and ensure the maintenance of, Thames Policy Areas. Boroughs are encouraged to work together on policies and to develop and update joint Thames Strategies that should support individual Development Plans.</p> <p>BA Development Plans and development proposals should seek to maximise the multifunctional benefits waterways provide.</p>

- 3.56 Blue infrastructure and waterways form part of the Green Infrastructure, Biodiversity and Open Space Study. This will form part of the Green and Blue Infrastructure Technical Report.

### Mayor of London Supplementary Planning Guidance (SPG)

- 3.57 SPGs provide further details on certain policies found in the London Plan.

All London Green Grid Supplementary Planning Guidance (March 2012)

- 3.58 The Mayor's All London Green Grid Supplementary Planning Guidance<sup>6</sup> (SPG) provides guidance for designing and managing green and open spaces to encourage boroughs, developers and communities to increase the delivery of green infrastructure for London.
- 3.59 The All London Green Grid SPG aims to:
- Provide guidance on the implementation of relevant policies in the London Plan;
  - Sets out a vision and spatial framework for London-wide strategic green infrastructure;
  - Promotes cross boundary working with the 11 Green Grid Areas; and
  - Identifies strategic green infrastructure opportunities.
- 3.60 Paragraph 2.3 states that purpose of the All London Green Grid is to be productive, responsive, attractive and connected. Productive spaces includes providing food, enhancing biodiversity and supporting natural processes. Responsive spaces are able to adopt to changing conditions and a changing climate. Attractive spaces make a significant contribution to the identity of neighbourhoods and connected spaces encourage healthy lives through safe walking and cycling routes.
- 3.61 The functions of green infrastructure as states in the London Plan are:-
- Protection and enhancement of biodiversity, including mitigation of new development;
  - Making a positive contribution to tackling climate change by adapting to and mitigating its impact;
  - Improving the management of water resources, flood mitigation and reduced flood risk through sustainable urban drainage systems;
  - Increasing recreational opportunities, access to and enjoyment of open space and the Blue Ribbon Network to promote healthy living;
  - Creating a sense of place and opportunities for greater appreciation of the landscape, and cultural heritage;
  - Promoting walking and cycling;
  - As a place for outdoor education and children's play; and
  - As a place for local food production.
- 3.62 Green Grid Area (GGA) 8 Wandle Valley runs through five London Boroughs, one of which is Merton. The Wandle Valley Regional Park initiative sets out a vision for the creation and improvement of a linked network of open spaces along the river corridor. This is the only Green Grid Area in Merton and proposed as an area for potential green infrastructure improvement through Merton Core Planning Strategy 2011.
- 3.63 The All London Green Grid SPG states that the strategic green infrastructure opportunities for the Wandle Valley are:

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<sup>6</sup> [https://www.london.gov.uk/sites/default/files/algg\\_spg\\_mar2012.pdf](https://www.london.gov.uk/sites/default/files/algg_spg_mar2012.pdf)

- Continue work to create a new regional park as a vehicle to improve the quality, management, funding and identity of open space within the Wandle Valley.
- Improve the ecological and environmental value of the River Wandle through restoration projects (such as deculverting the river in Wandle Park), habitat enhancement and species re-introduction, and projects which seek to mitigate flood risk.
- Create a 200 hectare country park at Beddington Farmlands through the restoration of land used for gravel extraction and landfill tipping, linking Beddington Park (London Borough of Sutton) with Mitcham Common (London Borough of Merton).
- Create improved cycle and pedestrian connections to the Wandle Valley and Wandle Trail from the surrounding areas – through significant open spaces such as the proposed district park, and a suite of projects connecting the River Wandle to Croydon Town Centre.

Play and Informal Recreation Supplementary Planning Guidance (September 2012)

3.64 The Play and Informal Recreation Supplementary Planning Guidance<sup>7</sup> (SPG) promotes a child-friendly city, where children have access to play and recreation opportunities. It also promotes play and recreational facilities, which are inclusive, accessible and safe.

3.65 The SPG aims to:-

- Work with boroughs and other partners to ensure that all children have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision
- Ensure housing developments make adequate provision for play and informal recreation, based on the development's expected child population and an assessment of future needs

London View Management Framework Supplementary Planning Guidance (March 2012)

3.66 The London View Management Framework Supplementary Planning Guidance<sup>8</sup> (SPG). The SPG seeks to designate, protect and manage twenty-seven views of London and some of its major landmarks.

3.67 The London Borough of Merton is not within a viewing corridor or within a wider consultation setting of a view corridor.

3.68 Designated views are concentrated around the River Thames and North London. This is due to the historic landmarks located around the River Thames and the higher topography in North London, which creates views towards the River Thames.

<sup>7</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/play-and-informal>

<sup>8</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/london-view-management>

## Other Relevant Strategies

### Natural Capital: Accounts for public green space in London (October 2017)<sup>9</sup>

- 3.69 This report highlights the economic value and benefits provided by public parks and green spaces. It provides an evidence base for maintaining, or even increasing investment in London's public green spaces.
- 3.70 The main findings of the report are set out in Section 1.2:-
- **London's public parks have a gross asset value in excess of £91 billion** - The value of parks reflects their general amenity, benefit to health and opportunity for exercise, and the value of recreation. Individuals, public services and businesses all benefit from public parks across the city.
  - **For each £1 spent by local authorities and their partners on public parks, Londoners enjoy at least £27 in value** - This demonstrates value for money from the network of public parks for London and Londoners, and therefore encourages the investment in existing parks.
  - **Londoners avoid £950 million per year in health costs due to public parks. Public parks create opportunities for people to exercise, socialise, relax and enjoy being part of their community** - The total cost is made up of £580 million per year by being in better physical health and £370 million per year by being in a better mental health. The health benefits of London's public parks amount to 20 per cent of their total economic value.
  - **The value of recreational activities is estimated to be £926 million per year** - London's public parks provide many opportunities for recreational activities that people enjoy, including sporting activities and enjoyment of natural and cultural heritage.
  - **People enjoy the benefits of the services provided by public parks and this is reflected in the amount they are willing to pay to live close to them** - It is estimated that for the average household in London, the value of proximity to parks is over £900 per year.
  - **Public parks supply other services too, such as temperature regulation and carbon storage** - Green spaces in urban areas counter higher temperatures in summer months that can lead to ill health and carbon storage is provided by the soil and trees.
  - **One fifth of the area of Greater London is designated as publicly accessible parks** - Public parks are defined as areas in Greater London that are free to enter and use. This includes local and regional parks, woodlands, sports fields and children's play areas. Other green areas, such as private gardens, farmland and private sports fields and golf courses are not included in the study.
  - **All these estimates are based on a number of assumptions about the effects that urban parks have on Londoners and their preferences** - Further work is required to understand the number of people who use parks and activities they engage in.

<sup>9</sup> [https://www.london.gov.uk/sites/default/files/11015viv\\_natural\\_capital\\_account\\_for\\_london\\_v7\\_full\\_vis.pdf](https://www.london.gov.uk/sites/default/files/11015viv_natural_capital_account_for_london_v7_full_vis.pdf)



- **The term ‘economic value’ refers to some of the benefits that people enjoy** - These benefits, when represented in monetary terms, give policy makers and the public a better understanding for making decisions about park management and funding

#### London Environment Strategy (May 2018)

- 3.71 The London Environment Strategy<sup>10</sup> sets out a vision for improving London's environment. This includes air quality, new green spaces and tackling environmental challenges.
- 3.72 Environmental challenges identified in the London Environment Strategy are:-
- Air quality – London's air is dangerously and illegally poor. These high levels can harm human health and stop children's development
  - Green space – Development encroaches on green spaces and private gardens are being paved over. There has been a gradual loss in green spaces across London and half of Londoners have poor access to parks, and Local Authorities have less funding to spend on maintenance so quality has declined.
  - Biodiversity – Areas of green space has been lost and reduced in quality, therefore the range of plants and animals in London have decreased.
  - Flood Risk – The loss in green space and expansion of impermeable surfaces has increased flood risk in several areas of London.
- 3.73 Taking into consideration the identified environmental challenges the aims of the London Environment Strategy up to 2050 state that
- London will be the world's first 'National Park City' where more than half of it's area is green, where the natural environment is protected and where the network of green infrastructure is managed to benefit all Londoner's.*
- All Londoners should be able to enjoy the very best parks, trees and wildlife. Creating a greener city is good for everyone – it will improve people's health and quality of life, support the success of businesses and attract more visitors to London.*
- 3.74 Chapter 3 Green Infrastructure and Natural Capital Accounting, states that London's green infrastructure can reduce the impacts of climate change, improve air and water quality; and promote healthier lives. It can also provide ecological and economic benefits.
- 3.75 Chapter 3 also provides details on the Transport for London Healthy Streets Approach, which provides a framework for promote human health as a priority for planning.

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<sup>10</sup> [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

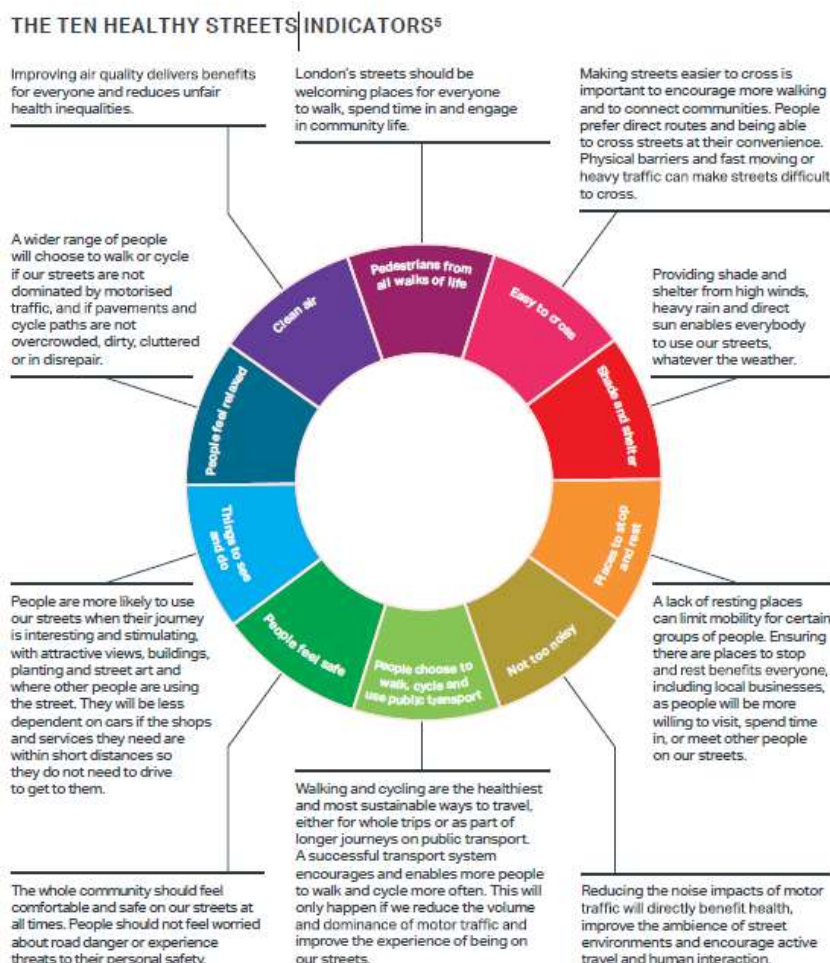


Figure 4: The Ten Healthy Streets Indicators

3.76 Chapter 5 Green Infrastructure aims to green half of London's area by 2050 by promoting, enhancing and increasing green areas in the city, as well as conserving and enhancing wildlife.

3.77 Chapter 5 also highlights the value of London's natural capital and states that it should be promoted as an economic asset. There should also be greater support and investment in green infrastructure.

Mayor's Biodiversity Strategy (July 2002)

3.78 The Mayor's Biodiversity Strategy<sup>11</sup> aims to protect and enhance the natural habitats of London together with their variety of species.

3.79 The Strategy's objectives for biodiversity are:-

- *Biodiversity for people:* to ensure all Londoners have ready access to wildlife and natural green spaces.

<sup>11</sup> [https://www.london.gov.uk/sites/default/files/biodiversity\\_strategy.pdf](https://www.london.gov.uk/sites/default/files/biodiversity_strategy.pdf)

- *Nature for its own sake*: to conserve London's plants, animals, and their habitats.
- *Economic benefits*: to ensure the economic benefits of natural greenspace and greening are fully realised.
- *Functional benefits*: to ensure London enjoys the functional benefits that biodiversity can bring.
- *Sustainable development*: to recognise biodiversity conservation as an essential element of sustainable development.

3.80 Merton has Metropolitan, Borough (Grade I), Borough (Grade II) and Local Sites of Importance for Nature Conservation (SINCs). The Mayor's Biodiversity Strategy states that:

*"SINC or equivalent includes any site protected for nature conservation. Green Corridor includes similar designations such as Wildlife Corridor, but not Green Chain, which is recorded separately. Other protected open space includes a wide range of designations, including Public Open Space, Urban Green Space, Local Open Land and Private Open Space; specify the designation which applies."*

3.81 Appendix 4.5 of the Mayor's Strategy provides a sample survey form which is still used to survey SINC's. The sample survey has been used as part of the survey work for the Designated Sites Boundary Review Technical Report (the sample survey has been included in the Technical Report).

#### Strategy for the Wandle Valley Regional Park Trust 2016-2021<sup>12</sup>

3.82 The Wandle Valley Regional Park is a vibrant but fragmented network of over 40 green spaces, and 12 nature reserves, linked by the riverside Wandle Trail, covering some 900 hectares. The Wandle Valley Regional Park runs through four boroughs (Croydon, Sutton, Wandsworth and Merton). In Merton, the regional park follows the River Wandle from Wimbledon, through Colliers Wood and ends in Mitcham Common. Mitcham Common.

3.83 The vision for the Wandle Valley is to *"be a coherent and vital part of London's green space network, creating a place, rich in heritage, where people are proud to live, work and play, that contributes to the economic vibrancy of South London"*.

3.84 The strategic aims are:-

- *Landscape* - The Wandle Valley is a clean, safe, sustainable and attractive natural environment. Its river valley character is protected and enhanced, and its biodiversity, heritage and archaeology are celebrated.
- *Heritage and culture* - The Wandle Valley's rich heritage and culture (current as well as past and future) is celebrated, preserved and developed, making it accessible to the diverse local community and

<sup>12</sup> <http://wandlevalleypark.co.uk/wp-content/uploads/2016/11/WVRPT-Strategy-Bringing-the-Park-to-Life-2016-2021.pdf>

attractive to visitors. The Living Wandle Partnership's heritage legacy is enhanced.

- *Health and wellbeing* - The Wandle Valley is a place for healthy living. It enhances physical and mental health, by improving access and quantity of good public realm and greenspace.
- *Natural Systems and Resilience* - The natural capital of the Wandle Valley and the River Wandle, with its network of green and blue spaces, is maintained and enhanced and its resilience to climate change increased.
- *People and communication* - Diverse communities along the Wandle Valley feel a shared ownership of the park, and are actively engaged in its development, management and enjoyment. Local communities, partners, stakeholders, businesses & visitors recognise the regional park and support it through advocacy, volunteering, fundraising & partnership working.
- *Economic Growth* - The Wandle Valley and the Regional Park becomes a driver of economic growth, and a strong business case develops for investment in heritage and the environment. A collaborative economy develops in the Wandle Valley that uses the environment to encourage employment, training, apprenticeships and enterprise.

#### London National Park City

- 3.85 The London National Park City is supported in planning policy through the London Environment Strategy (May 2018) and the draft New London Plan (2018). The London National Park City Charter is currently being prepared for the launch in May 2019. The Charter will set out the London National Park City Partnership's vision, aims, values and an action plan.
- 3.86 The London National Park City Foundation are currently agreeing a definition and typology for a 'National Park City', the current working definition is *"a large urban area that is managed and semi-protected through both formal and informal means to enhance the natural capital of its living landscape. A defining feature is the widespread and significant commitment of residents, visitors and decision-makers to allow natural processes to provide a foundation for a better quality of life"* (2015).
- 3.87 The London National City Park will work with residents, visitors and partners to:-
- Enjoy London's great outdoors more;
  - Make the city greener, healthier and wilder; and
  - Promote London's identity as a National Park City.
- 3.88 The London National Park City help tackle some of the challenges London faces, including air and water quality; threats to protected green spaces; fewer children having access to outdoor play and learning; growing childhood obesity and poor adult mental and physical health; inequality and isolation; and poor community cohesion.

## 4.0 Local Context

- 4.1 This chapter includes the statutory development plan and relevant supporting documents currently adopted by the London Borough of Merton.
- 4.2 The Local Plan sets out local planning policies, identifies how land is used and determines what will be built where. The development plan documents which have been reviewed for the Green Infrastructure, Biodiversity and Open Space Study comprise:
- Merton's Core Planning Strategy (2011);
  - Merton's Site and Policies Plan and Policy Map (2014); and
  - Merton's Estates Local Plan (2018)
  - South London Waste Plan (2012-2021)
- 4.3 The information in this section focuses on green infrastructure, biodiversity and open space planning policies. It also considers supplementary planning guidance documents which have been adopted to provide additional information and guidance on planning policies.

### Merton's Core Planning Strategy 2011-2026<sup>13</sup>

Table 26: Merton's Core Planning Strategy - Strategic Objective 5

Reference	Policy
Strategic Objective 5	<p><b>To make Merton a healthier and better place for people to live and work in or visit.</b></p> <p>We will achieve this by:</p> <p>a. Improving public health and well-being including working in partnership to deliver health facilities and promote healthy lifestyles;</p> <p>d. Improving access to nature and leisure facilities including opportunities for sport, play and relaxation;</p> <p>f. Creating safe, attractive and accessible places.</p>

- 4.4 Access to quality open space and play provisions is known to improve health and wellbeing. Merton has a range of open spaces, sports facilities and areas of play for children and young people.

<sup>13</sup> [https://www2.merton.gov.uk/2011-07-13\\_merton\\_core\\_strategy\\_adopted.pdf](https://www2.merton.gov.uk/2011-07-13_merton_core_strategy_adopted.pdf)

- 4.5 The Index of Multiple Deprivation, commonly known as the IMD, is the official measure of relative deprivation for small areas in England. In the 2015 IMD, Merton was ranked 39 out of 152 upper tier authorities, for the Living Environment Deprivation Domain, which is measured by the indoor living environment through the quality of housing, and the outdoors living environment through air quality and road traffic accidents<sup>14</sup>. However Merton was ranked 132 out of 152 in the IMD for Health Deprivation and Disability Domain. The Health Deprivation and Disability Domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. High quality, accessible open spaces are proven to increase mental wellbeing and increase opportunities for exercise, walking and cycling.
- 4.6 The Green Infrastructure, Biodiversity and Open Space Study will assess the quantity, quality and access to each open space. Surplus and deficiency information will be gathered and recommendations will be made to improve the existing green infrastructure, biodiversity and open space provisions in Merton. Recommendations will be consistent with the objectives and aspirations of the health and wellbeing strategies set out in Section 5.

Table 27: Merton's Core Planning Strategy - Strategic Objective 6

Reference	Policy
Strategic Objective 6	<p><b>To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place.</b></p> <p>We will achieve this by:</p> <ul style="list-style-type: none"> <li>a. Mitigating and adapting to the local, regional, national and global challenges of climate change as they affect Merton and encouraging development to achieve the lowest possible impact;</li> <li>c. Enhancing existing open spaces and the natural environment, providing adequate habitats for biodiversity to flourish and expand;</li> <li>d. Providing the local community with a new regional park in the Wandle Valley.</li> </ul>

- 4.7 Enhancing existing open spaces and the natural environment in Merton will support Core Planning Strategy Objective 6 and help Merton withstand climate change. Strategic Objective 6 also aims to support the development of a new regional park in the Wandle Valley, which is also promoted through the London Plan (2016) and the Strategy for the Wandle Valley Regional Park Trust 2016-2021

<sup>14</sup> <https://data.merton.gov.uk/deprivation/>



4.8 Surveys will be undertaken on all open spaces within Merton, including the Wandle Valley areas. The survey work will inform the assessment of open space for quantity, quality and accessibility. Recommendations will be made for enhancement and improvement to access and quality, which in turn will enable a proactive approach to climate change.

*Table 28: Merton's Core Planning Strategy - Policy CS5 Wandle Valley*

Reference	Policy
Policy CS 5	<p><b>Wandle Valley</b></p> <p>The Wandle Valley will act as a strategic fulcrum in bringing together initiatives that will contribute towards bridging the gap between the east and the west of Merton.</p> <p>Our objectives to deliver this vision are to:</p> <ol style="list-style-type: none"> <li>a. Improve the overall environment of Mitcham District Centre and surrounds by supporting businesses and enterprise, enhancing the public realm, and a more sustainable mix of new homes, including family housing;</li> <li>b. Regenerate Morden District Centre to provide improved quality and quantity of commercial, residential and leisure uses in an attractive suburban setting;</li> <li>c. Create a thriving, attractive and coherent District Centre at Colliers Wood, addressing flood risk comprehensively and facilitating an improved range of town centre uses;</li> <li>d. Maximise business and employment opportunities within the Wandle Valley, including for environmental technologies, creative industries and innovative businesses, optimising the performance of industrial areas;</li> <li>e. Support the creation of the Wandle Valley Regional Park, achieving a high quality, linked green infrastructure network, protecting biodiversity and providing opportunities for formal and informal recreation;</li> <li>f. Protect and enhance the river Wandle, including its green chains, biodiversity and wildlife corridors and recreational attributes;</li> <li>g. Conserve and enhance archaeological sites and protect conservation areas in the Wandle Valley and raise awareness of this heritage including Merton Priory and Merton Abbey Mills;</li> <li>h. Work with the Environment Agency, GLA, landowners and developers to explore viable and appropriate measures that contribute to minimising flood risk;</li> <li>i. Seek improvements to the transport accessibility to and within the area.</li> </ol>



- 4.9 The Wandle Valley is a vibrant but fragmented network of over 40 green spaces, and 12 nature reserves, linked by the riverside Wandle Trail, covering approximately 900 hectares. The section of the Wandle Valley cuts through the centre of Merton from Wimbledon and Tooting in the north to Croydon in the south.
- 4.10 The Wandle Valley is a strategic green infrastructure opportunity on a regional and local level, as per the All London Green Grid Supplementary Planning Guidance (Green Grid Area 8, Wandle Valley).
- 4.11 As part of the surveys for the Green Infrastructure, Biodiversity and Open Space Study the Wandle Valley (within Merton) will be assessed and recommendation will be made to assist in achieving the aims and objectives set out in the Merton's Core Planning Strategy and the All London Green Grid SPG. A comprehensive map will also be compiled to show the different typologies within the Wandle Valley, which will demonstrate the variety of potential opportunities.

*Table 29: Merton's Core Planning Strategy - Policy CS11 Infrastructure*

Reference	Policy
Policy CS 11	<p><b>Infrastructure</b></p> <p>We will support the provision and improvement of infrastructure of the borough for those living, working and visiting Merton and to accommodate population growth by:</p> <ul style="list-style-type: none"> <li>e. Supporting multi use of social, educational, cultural and recreational facilities;</li> <li>f. Resisting the net loss of social and community facilities particularly where a need has been identified;</li> </ul>

Table 30: Merton's Core Planning Strategy - Policy CS13 Open Space, Nature Conservation, Leisure & Culture

Reference	Policy
Policy CS 13	<p><b>Open space, nature conservation, leisure and culture</b></p> <p>We will:</p> <ul style="list-style-type: none"> <li>a. Protect and enhance the borough's public and private open space network including Metropolitan Open Land, parks, and other open spaces;</li> <li>b. Improve access to open space and nature conservation by public transport, cycle, mobility vehicles and on foot;</li> <li>c. Expect development to incorporate and maintain appropriate elements of open space, play areas and landscape features such as trees which makes a positive contribution to the wider network of open spaces. Where this is not feasible, planning contributions will be sought to do so;</li> <li>d. Work with partners to develop and implement proposals for the Wandle Valley Regional Park;</li> <li>f. Safeguard our existing allotments and encourage the use of land for growing food.</li> <li>g. Nature Conservation</li> </ul> <p>To improve opportunities for our residents and visitors to experience nature we will:</p> <ul style="list-style-type: none"> <li>2. Encourage new green links, green corridors and islands to seek to reduce areas of deficiency in nature conservation and to create safe species movement and havens for nature;</li> <li>5. Protect street trees and use Tree Preservation Orders to safeguard significant trees;</li> <li>6. Improve public access to and enhance our waterways, including the River Wandle and its banks, for leisure and recreational use while protecting its biodiversity value;</li> <li>7. Expect new development within the area of the Wandle Valley Regional Park, where appropriate, to incorporate physical, visual and landscape connections that will encourage pedestrian and cycle accessibility and enhance the attractiveness of the park;</li> <li>h. Leisure and culture</li> </ul>

Reference	Policy
	<p>Based on assessment of need and capacity, opportunities in culture, sport, recreation and play will be promoted by:</p> <ol style="list-style-type: none"> <li>2. Refurbishing and replacing culture, sport, recreation and play facilities in our parks and open spaces;</li> <li>3. Promoting healthy lifestyles to encourage physical education and well-being through the use of our leisure centres, schools, open spaces, playing pitches, recreation space and engagement in the arts through the use of our schools and colleges, open spaces, theatres and libraries. We will also encourage exercise in daily routines such as when travelling to work or school;</li> <li>4. Working with partners to facilitate and enable them to deliver culture, sport, recreation, play facilities and events for community benefit. To encourage shared use of sites and space through joint funding initiatives and commissioning, external funding including public and private sources;</li> <li>5. Safeguarding existing and seeking to provide enhanced play facilities along with formal and informal play spaces where these are needed;</li> </ol>

- 4.12 Policy CS13 sets out the aims and objectives for open space, nature conservation, leisure and culture for Merton. Merton has a range of open spaces including MOL, parks, play facilities, allotments and areas of nature conservation.
- 4.13 The Merton's Core Planning Strategy provides justification for each policy. The justification for Policy CS 13 is based on an emphasis to protect existing green and open spaces rather than creating new green and open space. This is because Merton is made up of 18% green space, which is above the London average of 10%. Paragraph 21.4 states that people use open space for exercise, play, socialising and relaxing. It also states that visual accessibility is equally important as physical access.
- 4.14 Paragraphs 21.5 and 21.6 highlight the value of front and back gardens in terms of biodiversity, climate change and flood mitigation. It states that although the Merton's Core Planning Strategy encourages front gardens to be covered in a permeable surface, any works to an area less than 5m<sup>2</sup> can be undertaken under General Permitted Development Order (GDPO 2008) and therefore does not require planning permission.
- 4.15 Allotments are recognised in paragraph 21.7 for their contribution to enabling health and sustainable lives. They offer recreational value as well as health and social benefits and therefore should be protected.
- 4.16 The Wandle Valley Regional Park is identified as a key green infrastructure opportunity through the London Plan and All London Green Grid SPG. The Wandle Valley Regional Park will provide a key cultural and recreational asset for the borough and protect the biodiversity value.

- 4.17 Paragraph 21.15 states that parks, play areas and leisure/cultural facilities encourages healthier, more active lifestyles and helps to improve mental well-being and social interaction. Furthermore, paragraph 21.17 states that children's play areas encourages happiness, social cohesion and development.
- 4.18 The Green Infrastructure, Biodiversity and Open Space Study will provide an assessment of all the open space typologies in Merton. This will then be mapped to demonstrate surplus and deficiency in the quantity, quality or deficiency of open spaces. Recommendations and strategies will be made to encourage new green links, improve access and nature conservation opportunities in the Wandale Valley and safeguard and recommend quality improvements to play facilities.

### Sites and Policies Plan 2014-2024

- 4.19 The Site and Policies Plan<sup>15</sup> and Policies Map was adopted in 2014 and includes detailed planning policies which guide planning applications for development Merton, as well as implementing strategic principles set out in the Merton's Core Planning Strategy 2011 and London Plan.
- 4.20 The Site and Policies Plan and Policies Map includes a full list of open spaces, nature conservation sites and historic gardens. The planning policies relevant to the Green Infrastructure, Biodiversity and Open Space Study are identified in the tables below.

*Table 31: Sites and Policies Plan - Policy DM01 Open Space*

Reference	Policy
Policy DM01	<p><b>Open space</b></p> <p><b>Policy aim</b></p> <p>To protect and enhance open space and to improve access to open space.</p> <p><b>Policy</b></p> <p>a) The council will continue to protect Metropolitan Open Land (MOL) and designated open spaces from inappropriate development in accordance with the London Plan and government guidance.</p> <p>b) In accordance with the NPPF, existing designated open space should not be built on unless:</p> <p>i. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or,</p> <p>ii. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or,</p> <p>iii. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p>

<sup>15</sup> [https://www2.merton.gov.uk/merton\\_sites\\_and\\_policies\\_part\\_1\\_policies\\_jul14.pdf](https://www2.merton.gov.uk/merton_sites_and_policies_part_1_policies_jul14.pdf)

Reference	Policy
	<p>c) Development proposals within designated open spaces, which have met the conditions set in part b) above, will be required to meet all the following criteria:</p> <ul style="list-style-type: none"> <li>i. the proposals are of a high quality design and do not harm the character, appearance or function of the open space;</li> <li>ii. the proposals retain and/or improve public access between existing public areas and open spaces through the creation of new and more direct footpath and cycle path links; and,</li> <li>iii. the character and function of leisure walks and green chains are preserved or enhanced.</li> </ul> <p>d) The council supports the creation of new open spaces as part of major development proposals where suitable and viable.</p> <p>e) Development in proximity to and likely to be conspicuous from MOL or designated open space will only be acceptable if the visual amenities of the MOL or designated open space will not be harmed by reason of siting, materials or design.</p>

- 4.21 Policy DM 01 aims to protect and enhance open space and improve access to open space. Merton has many open space assets which include MOL, open space for sports and recreation and green infrastructure which links to foot and cycle path links
- 4.22 Merton has pressures from development to reach key housing, employment and infrastructure targets. However it is also important to protect and enhance open spaces, which provide social, economic and environmental benefits for residents and visitors to Merton.
- 4.23 The Green Infrastructure, Biodiversity and Open Space Study will survey and map the existing open spaces in Merton. The surveys will be based on the most up to date information from Merton, GiGL and Fields in Trust best practice guidance.
- 4.24 As part of the Green Infrastructure, Biodiversity and Open Space Study process recommendations will be made to improve and enhance existing open spaces and improve quality and accessibility where possible.

Table 32: Sites and Policies Plan - Policy DM02 Nature Conservation, Trees, Hedges and Landscape Features

Reference	Policy
Policy DM02	<p><b>Nature conservation, trees, hedges and landscape features</b></p> <p><b>Policy aim</b></p> <p>To protect and enhance biodiversity, particularly on sites of recognised nature conservation interest. To protect trees, hedges and other landscape features of amenity value and to secure suitable replacements in instances where their loss is justified.</p> <p><b>Policy</b></p> <p>a) The council will protect all sites of recognised nature conservation interest and the green corridors linking them, against inappropriate development in accordance with the measures set out in Merton's Core Planning Strategy Policy CS 13 part g and wherever possible, secure measures that enhance their nature conservation value. Development which may destroy or impair the integrity of green corridors will not be permitted and proposals in and adjacent to these corridors will be expected to enhance their nature conservation value.</p> <p>b) A development proposal will be expected to retain, and where possible enhance, hedges, trees and other landscape features of amenity value.</p> <p>c) Development will only be permitted if it will not damage or destroy any tree which:</p> <ul style="list-style-type: none"> <li>i. is protected by a tree preservation order;</li> <li>ii. is within a conservation area; or,</li> <li>iii. has significant amenity value.</li> </ul> <p>d) However, development may be permitted when:</p> <ul style="list-style-type: none"> <li>i. the removal of the tree is necessary in the interest of good arboricultural practice; or,</li> <li>ii. the benefits of the development outweighs the tree's amenity value.</li> </ul> <p>e) In granting permission for a proposal that leads to the loss of a tree, hedge or landscape feature of amenity value, replacement planting or landscape enhancement of a similar or greater value to that which has been lost, will be secured through the use of conditions or planning obligations.</p> <p>f) Proposals for new and replacement trees, hedges and landscape features should consist of appropriate native species to the UK.</p>

- 4.25 Merton has a wide variety of Site of Importance for Nature Conservation. These are categorised as:-
- Sites of Local Importance;
  - Site of Borough Importance Grade I;
  - Sites of Borough Importance Grade II; and
  - Sites of Metropolitan Importance.

4.26 Policy DM 01 recognises the importance of trees, hedgerows and green links which provide important habitats and connections for wildlife through Merton. They also have an important amenity value and reduces the effects of climate change.

4.27 As part of the Green Infrastructure, Biodiversity and Open Space Study all existing SINCs will be surveyed by a suitably qualified ecologist and any enhancement opportunities will be identified. The survey will also provide information on the existing boundaries of SINCs and identify any boundary changes which could lead to the expansion or reduction of a site.

### **Estates Local Plan (2018)**

4.28 Merton's Estates Local Plan adopted in 2018, contains detailed planning policies, which guide development on three estates in Merton; Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Mitcham/Morden). Development proposals for the estates will be assessed against policies in this plan as well as policies in Merton's Local Plan.

4.29 The Estates Local Plan will assist in the shaping and management of the redevelopment process of Eastfields, High Path and Ravensbury to create new, well designed, high quality neighbourhoods aimed at fundamentally improving the quality of life for existing and future residents.

4.30 The key drivers for the plan include providing opportunities to improve parks and landscaped areas within the identified areas to create sustainable neighbourhoods.

4.31 Policy OEP 1 Vision, states that *"Development proposals for Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Mitcham/ Morden) must create sustainable, well-designed, safe neighbourhoods with good quality new homes that maintain and enhance a healthy local community, improve living standards and create safe environments"*.

4.32 Policy OEP 1 particularly emphasis Ravensbury for the creation of a new neighbourhood that relates to the wider parkland and protects local heritage, landscape quality and biodiversity.

4.33 Policy OEP 3 Urban Design Principles states developments should provide high quality, usable and communal space, as well as promoting biodiversity and opportunities for health and active lifestyle choices.



- 4.34 Paragraph 2.18 (Landscaping) states that all public amenity space must be of a high quality design, attractive, useable, fit for purpose and addresses any identified shortfalls. Furthermore paragraph 2.20 states that development proposals should incorporate and promote biodiversity, through open space, street trees, green chains and Sustainable urban Drainage Systems (SuDs).

#### Eastfields

- 4.35 The Eastfields Estate has a large, pleasant green space at its centre, which is cut-off from its surroundings, both for people and biodiversity.
- 4.36 Policy EP E4 (Land Use) states that the land use for the estate will remain predominantly residential with associated landscaping provision and with provision of no fewer than the existing area of designated open space.
- 4.37 Policy EP E5 (Open Space) shows designated open space along the south and south eastern boundaries of the Eastfields estate, adjacent to the Streatham Park Cemetery and illustrative new open space and retained trees in the centre of the estate. The policy states that *"there must be equivalent or better re-provisions of the area of designated open space at the boundary with the [Streatham Park] cemetery in terms of quantity and quality landscaping and recreational use"*. Furthermore development proposals must provide public open space and address any deficiencies in access to Local Open Space. There should also be suitably designed play areas.
- 4.38 Policy EP E7 (Landscape) states that street tree planning should be a key feature in landscape strategies and they should form green links between open spaces and the public realm. Tree species must mitigate against pollution and noise.

#### High Path

- 4.39 The High Path estate has a lot of incidental open green space but lacks significant high quality landscape, particularly trees.
- 4.40 Policy EP H5 (Open Space) shows the indicative locations of medium and larger sized open spaces. The policy states that development proposals must provide public open space to address the identified deficiency in accessible Local Open Spaces.
- 4.41 Policy EP H7 (Landscape) aims to provide new open spaces and a network of biodiversity enhancing green corridors across the estate, which will assist with air and noise pollutions and the urban heat island effect. The policy states that where possible existing mature tree groups and street trees should be retained.

#### Ravensbury

- 4.42 The surrounding mature trees of Morden Hall Park and Ravensbury Park and the riparian landscape of the River Wandle define the landscape of the estate. This gives the estate its secluded feel and is an essential part of its character.
- 4.43 Policy EP R5 (Open Space) shows indicative open space including an existing communal garden to be enhanced in the western section of the estate and opportunities to improve accessibility the surrounding open space. The policy states that development proposals should have consideration of suitably designed play spaces.

- 4.44 Policy EP R6 (Environmental Protection) states that proposals should seek to create mini corridors, which enhance biodiversity of the estate and create a link between the estate and the surrounding parkland and river corridor habitats. There is also a river bank buffer zone around the River Wandle, which is managed for the enhancement of biodiversity and management of the water course.
- 4.45 Policy EP R7 (Landscape) states that landscaping must be a prominent feature within the public realm to create strong links to the surrounding parkland context. Proposals should also retain and enhance the existing communal gardens on Hengelo Gardens and Ravensbury Grove.

### **Other Relevant Local Strategies**

#### Merton Health and Wellbeing Strategy 2015-2018

- 4.46 The Health and Wellbeing Strategy<sup>16</sup> has a vision of *"a fair share of opportunities for health and wellbeing for all Merton residents"*.
- 4.47 There are five key themes for the Health and Wellbeing Strategy. Key theme 5 'A good natural and built environment' states that:-

*"There is now strong evidence that the built environment shapes outcomes. A well-designed public realm with high quality green open space will encourage physical exercise, improve mental health, and increase biodiversity"*

Merton's Public Health team are currently producing a new Health and Wellbeing Strategy (pending 2019-24). The new strategy will have four themes - 'Start Well', 'Live Well', and 'Age Well' in a 'Healthy Place'.

#### Community Plan 2009-19

- 4.48 The vision set out in the Community Plan 2009-2019<sup>17</sup> is for *"Merton to be a great place to live and call home, where citizens take responsibility for their own lives, their neighbours and the environment"*.
- 4.49 The vision for green spaces and biodiversity by 2019 are for:
- Merton's assets will be managed in a sustainable way;
  - The tree canopy will have been increased through the Tree Planting Programme;
  - Trees and plants will be planted as part of the sustainable urban drainage system developed to address flood risk;
  - Design improvements will have resulted in better access and improve health benefits;
  - More drought resistant planting will have been planted rather than water intensive planting; and
  - Green corridors will have been set up throughout the borough to encourage the movement of species and help conserve biodiversity as the climate changes and contribute to the green infrastructure of the borough.

<sup>16</sup> <https://www2.merton.gov.uk/merton-health-and-wellbeing-strategy-web.pdf>

<sup>17</sup> [https://www.merton.gov.uk/assets/Documents/merton\\_community\\_plan\\_single\\_pages\\_.pdf](https://www.merton.gov.uk/assets/Documents/merton_community_plan_single_pages_.pdf)

- 4.50 Merton Council is currently producing a new Community Plan, which will update the 2009 current plan.

### Population and Housing Growth

- 4.51 On average, 450-500 homes are built in Merton every year, depending on the decade chosen. The year with the highest level of construction was 2005-06, when 791 homes were built; this was at the end of a considerable period of national economic growth, a long-term buoyant property development and housing market, and was also the year where three major government-funded sites were built out. Details are available in Merton's Authority Monitoring Reports<sup>18</sup> which can be found on the website. <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan>
- 4.52 Merton has met its share of London's housing target every year for the last 14 years bar one. The London Plan housing targets for Merton have ranged from 430 new homes per year (in 2004) to 320 new homes (in 2010) and is currently 411 new homes per year as set in the London Plan 2016.
- 4.53 Merton's Sites and Policies Plan (2014) includes the site allocations for redevelopment and the land use for each site over the plan period. Merton Council are currently updating their Local Plan and as part of this process new identified sites will be allocated for development.
- 4.54 The Open Space Assessment uses current (baseline) and future population data to assess existing and future needs for open space provision. 2018 is used as the baseline year, and 2035 is used for the future, in line with Merton's Local Plan.
- 4.55 For the current and future population figures, the Open Space Assessment uses the Population and Household Projections by the Greater London Authority (GLA<sup>19</sup>). This provides figures at borough and ward level.
- 4.56 Population projections from the Merton Strategic Housing Market Assessment (SHMA) (Draft Report October 2018<sup>20</sup>) are also used to assess future provision at the borough level (not available at ward level), to demonstrate future need for open space based on differing population projections. There are two population projections taken from the SHMA report based on 'low' (823 dwellings per annum) and 'high' (1328 dwellings per annum) growth scenarios. The SHMA uses 2017 as the baseline year.
- 4.57 Table 33 compares the GLA projection with the Merton SHMA projections.

*Table 33: Merton Population Projections*

Population Projection	Current Population (2017)	Current Population (2018)	Future Population (2035)	% Increase
GLA Population Projection	-	209,419	236,671	13%

<sup>18</sup> <https://www2.merton.gov.uk/AMR%202017-18.pdf>

<sup>19</sup> <https://data.london.gov.uk/dataset/projections>

<sup>20</sup> Demographic projections (Merton Strategic Housing Need Assessment Draft Report October 2018)

Population Projection	Current Population (2017)	Current Population (2018)	Future Population (2035)	% Increase
Merton SHMA - 823-dpa	206,052	-	226,629	10%
Merton SHMA - 1,328-dpa	206,052	-	249,689	21%

## Local Context

- 4.58 Merton is one of the smallest London boroughs with an area of 37 sq kilometres, it contains several distinct districts including Colliers Wood, Mitcham, Morden and Wimbledon, and popular open spaces including Mitcham and Wimbledon Commons. There are also a number of smaller local centres scattered across the borough at Arthur Road, Motspur Park, Wimbledon Chase, North Mitcham, Raynes Park and Wimbledon Village that each have their own distinct character.
- 4.59 The northern parts of the borough are characterised by tightly packed streets of late Victorian and Edwardian terraced housing around North Mitcham, Colliers Wood, South Wimbledon and Wimbledon Park. Large parts of south and east Merton are characterised by lower density housing and short terraces with gardens, in tree lined roads with wide grass verges.
- 4.60 Merton's historic environment contributes to the character, cultural heritage and identity of Merton. Merton has four parks registered as Historic Parks and Gardens of Special Historic Interest:
- Wimbledon Park (Grade II\*);
  - Cannizaro Park (Grade II\*);
  - Morden Hall Park (Grade II); and
  - South Park Gardens (Grade II).
- 4.61 Safeguarding Merton's open spaces including parks, play areas, leisure and cultural facilities encourages healthier, more active lifestyles and helps to improve mental well-being and social interaction.
- 4.62 A significant part of the borough's open space provision corresponds to Wimbledon and Mitcham Commons, which are extremely valuable for the borough in terms of nature conservation and are a popular leisure attraction for residents and visitors from outside the borough.

- 4.63 The Wandle Valley runs through south London from Croydon to the mouth of the Wandle at the Thames in Wandsworth. The Wandle River and the Wandle Trail acts as a green corridor for Wildlife and offers walking, cycling and other recreational opportunities. The Merton Core Planning Strategy (2011), current London Plan (2016) and the New Draft London Plan (2018) support the Wandle Valley Regional Park, which creates linkages to existing open space and provides key cultural and recreational assets.

## 5.0 Conclusion

- 5.1 This report has been produced by The Environment Partnership (TEP) Limited on behalf of Merton Council to review national, regional and local planning policies relevant to the Green Infrastructure, Biodiversity and Open Space Study, which will provide up to date information to inform the emerging Local Plan.
- 5.2 This report provides an overarching strategic view of national, regional and local planning policy, which provides a context for the next stage of the Green Infrastructure, Biodiversity and Open Space Study.



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