SUSTAINABILITY APPRAISAL REPORT

(Incorporating Environmental Report)

MERTON BOROUGH COUNCIL CORE STRATEGY DPD (SUBMISSION DPD)

June 2010

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Sustainability appraisal and the Core Strategy DPD

1.1 Sustainability

- 1.1.1 An essential consideration when drawing up planning documents is their effect on the environment and people's quality of life, both now and in the future. To help address this, a sustainability appraisal and strategic environmental assessment is carried out alongside the preparation of these plans to make sure social, environmental and economic issues are taken into account at every stage and that sustainable development can be delivered on the ground.
- 1.1.2 Sustainable development first moved into mainstream policy making and legislation after the Rio Earth summit in 1992, having emerged as a key issue in 1987, highlighted by Bruntland. Following the Rio Earth Summit, the UK government produced 'A Better Quality of Life, a Strategy for Sustainable Development in the UK' (1999), which described the main themes of sustainable development.
- 1.1.3 Subsequently, in March 2005 a new UK framework for sustainable development 'Securing the Future' was launched which took account of new policies since 1999, and highlighted the renewed international push for sustainable development from the World Summit on Sustainable Development in Johannesburg in 2002. Five principles of sustainable development are identified in 'Securing the Future':
 - Living within environmental limits.
 - Ensuring a strong, healthy and just society.
 - Achieving a sustainable economy.
 - Promoting good governance.
 - Using sound science responsibly.
- 1.1.4 Planning Policy Statement 1: Delivering Sustainable Development emphasises at paragraph 24 that planning authorities should ensure that sustainable development is treated in an integrated way in development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development."
- 1.1.5 Merton Council has published a Waste Management Strategy, a Sustainable Community Strategy and a Climate Change Strategy, which set a detailed context for sustainable development in the Borough. The preparation and implementation of planning documents in the Local Development Framework will take the agenda forward by setting out a spatial strategy for growth, policies to guide development proposals and plans for specific areas of the Borough. The timetable for producing the documents, Local Development Documents, is set out in the Local development Scheme. The first document produced is the Core Strategy DPD.

1.2 The Core Strategy DPD

1.2.1 The Core Strategy DPD establishes a vision for the spatial growth and development of Merton. Within the context of the vision, the DPD sets out proposals for development and regeneration, including infrastructure, for specific areas of the borough as well as policies to guide development proposals. The Core Strategy builds on the vision, proposals and policies of the London Plan, which was updated in 2009 with a draft replacement plan.

- 1.2.2 The current adopted London Plan establishes a spatial development strategy for Greater London and was adopted in February 2008. It sets out policy for the broad development strategy and more detailed subjects including housing, employment, transport, design, the environment and climate change. It establishes policy for Merton as part of a sub- -region comprising the boroughs of Croydon, Lambeth, Merton, Sutton, Kingston, Richmond and Wandsworth. The priorities for this area are identified as:
 - Strengthening economic linkages throughout the sub-region to central London;
 - Optimise the development of Opportunity Areas and Areas for Intensification (as set out in Policies 5E.2 and 5E.3);
 - Strengthen the Metropolitan town centres and encourage sensitive restructuring to reflect changes in the office market and the need for a range of economic activities and housing;
 - Ensure that new housing provision is complemented by adequate social and other infrastructure;
 - Exemplary approaches to waste, energy and water use, management and provision
 - Manage the reuse of surplus industrial land;
 - Improving the quality of the public realm;
 - Create a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor;
 - Promote improvements in the national rail network;
 - Improve orbital movement by public transport, including Croydon Tramlink extensions, and improve access to Heathrow;
 - Support the strategic co-ordination of the development corridor from Croydon to Gatwick.

1.3 Sustainability appraisal

- 1.3.1 This document forms a Sustainability Appraisal Report (SAR) for the Core Strategy DPD, incorporating the requirements of a strategic environmental assessment (SEA Directive¹). It provides an account of the process of sustainability appraisal and has been conducted in line with the Communities and Local Government (CLG) Plan Making Manual² and the CLG SEA Practical Guide (2005). Appendix F identifies where the processes and information required by the SEA Directive can be found in this SAR.
- 1.3.2 CLG guidance identifies five stages to undertaking sustainability appraisal:
 - a. Establishing the scope of appraisal
 - b. Assessing effects and considering alternatives
 - c. Preparation of a Sustainability Appraisal Report
 - d. Consultation
 - e. Monitoring the effects of implementing the Plan
- 1.3.1 Through the application of the process, the council has identified the scope for sustainability appraisal, key sustainability issues, and the likely impacts of the implementation of the plan. The methodology that has been applied is discussed further in Section 2.

¹ European Directive EC/2001/42 and the subsequent SEA Regulations 2004

² See Planning Advisory Service www.pas.gov.uk

2. Sustainability appraisal methodology and background information

2.1 Guidance

2.1.1 Guidance published by the Planning Advisory Service has been followed in preparing this SAR. This entails five key stages as identified in paragraph 1.3.2 above. The stages are set out in the context of the production of the Core Strategy DPD in Table 1, below.

Stages of Sustainability Appraisal

DPD STAGE 1 – Pre-production/Evidence Gathering

Stage A: Setting context/objectives; establishing baseline and deciding scope

- A1: Identifying other relevant policies, plans and programmes, and sustainability objectives.
- A2: Collecting baseline information.
- A3: Identifying sustainability issues and problems.
- A4: Developing the SA framework
- A5: Consulting on the scope of the SA.

DPD STAGE 2 – Production

Stage B: Developing and refining options and assessing effects

- B1: Testing the DPD objectives against the SA framework.
- B2: Developing the DPD options.
- B3: Predicting the effects of the DPD.
- B4: Evaluating the effects of the DPD.
- B5: Considering ways of mitigating adverse effects and maximising beneficial effects.
- B6: Proposing measures to monitor the significant effects of implementing the DPDs.

Stage C: Preparing the Sustainability Appraisal Report

• C1: Preparing the SA Report

Stage D: Consulting on the preferred options of the DPD and SA Report

- D1: Public participation on the preferred options of the DPD and the SA Report.
- D2(i): Appraising significant changes.

DPD STAGE 3: Examination

• D2(ii): Appraising significant changes resulting from representations.

DPD STAGE 4: Adoption and monitoring

• D3: Making decisions and providing information (Adoption Statement)

Stage E: Monitoring the significant effects of implementing the DPD

- E1: Finalising aims and methods for monitoring.
- E2: Responding to adverse effects.

2.2 Scoping

- 2.2.1 Setting the scope for sustainability appraisal has entailed the identification and review of other relevant policies, plans and programmes; collection of relevant environmental, social and economic information to characterise the area (the baseline); the identification of key issues; and establishing a framework for appraisal, the SA Framework. These tasks correspond to tasks A1, A2, A3 and A4 in Table 1.
- 2.2.2 The scope for appraisal was established through the completion of these tasks and the publication for consultation³ in March 2006 of a Scoping Report. This included the following information which now forms Appendix A and Appendix B, respectively, to this SAR:
 - review of other policies, plans and programmes
 - environmental, social and economic baseline
- 2.2.3 Given the subsequent major changes to the planning system, including the publication of the Climate Change Supplement to Planning Policy Statement 1 and the substantial advancement of baseline information, a Scoping Report Refresh was published in November 2008. Comments received have informed appraisal of the Core Strategy and are summarised in Appendix C.

Review of other plans (Appendix A, Task A1)

2.2.4 A review of all policies, plans and programmes with a bearing on the Core Strategy DPD was undertaken to help define the scope of the appraisal. Appendix A identifies documents published by the European Union, the UK Government, regional bodies and local bodies and sets out the key requirements and provisions that will influence the Core Strategy DPD. The issues have informed the appraisal, and by setting out a formal record of the review as Appendix A it is possible to identify the relationship between the Core Strategy DPD and the respective document.

Environmental, social and economic baseline (Appendix B, Task A2)

- 2.2.5 By establishing a baseline of environmental, social and economic information (Appendix B) key sustainability issues can be identified for consideration in appraisal. This task draws on information in the LDF evidence base, the LDF Annual Monitoring Report and various government websites. The data derived is presented in Appendix B as part of the Sustainability Appraisal Framework by allocation to a specific SA Objective. These 'indicators' provide a snapshot of current conditions and subsequent updating will inform monitoring (see Section 5).
- 2.2.6 Key background documents include:
 - South West London Strategic Housing Market Assessment (2010 final draft)
 - Merton's Strategic Housing Market Assessment Study (2010 in progress)
 - Merton Open Space Study Refresh (2010 in progress)
 - Merton Employment Land Study (2010 in progress)
 - Merton Employment Land Study (2005)

³ with the Government Office for London, the Mayor of London, London Development Agency, Transport for London, the Environment Agency, the Countryside Agency, English Nature, English Heritage, the Merton Chamber of Commerce, Merton's Adjoining London Boroughs, House Builders Federation, Merton Unity Network.

- Merton Town Centre Study update (2008)
- Merton Town Centre Capacity Study (2005)
- Merton Appropriate Assessment (2010)
- Merton's Affordable Housing Viability Study (2010)
- Dwelling Conversions Background Paper (2010)
- Tall Buildings Background Paper (2010)
- Wandsworth, Merton, Sutton and Croydon Level 1 Strategic Flood Risk Assessment December 2008 and Level 2 SFRA July (2009)
- Merton's Infrastructure Needs Assessment (2008)
- 2.2.7 Much of this information cannot be summarised as quantifiable data that can be entered in the baseline table in Appendix B. The baseline combines, therefore, commentary and data and allows for professional judgement.

Data Limitations

- 2.2.8 Quantified information, or data, is used to help explain how things are changing over time. However, this does not necessarily link cause and effect overtly and is limited in how well they can explain why particular trends are occurring and the secondary effects of any changes.
- 2.2.9 The data, therefore, acts as an indicator and has been selected to monitor progress towards the achievement of particular objectives and provide a tangible, measure with respect to broader issues. This measure is often only a small component of meeting the objective so may simplify the issues and interactions.
- 2.2.10 Appraisal relies, therefore, on a mixture of quantified data and professional judgement. Accordingly, the baseline includes a commentary with respect to the trend indicated by the current and historical data.
- 2.2.11 Much of the data is collected or collated by external bodies and Merton Council has little control over the temporal and spatial scope of the data collected and whether collection methods may change in the future. There are some gaps in the data collected as not all information is consistently available.

Key issues (Task A3)

2.2.12 Key issues were initially presented in the Scoping Report 2006 and this informed the preparation a set of 15 topic areas as sustainability objectives for the Borough. Key issues were subsequently revisited in the Scoping Report Refresh 2008. In between and after the publication of these reports, appraisal work has considered the issues and options presented for the DPD. The findings of the appraisal together with comments made by consultees and the priorities of the London Plan have further informed what the key sustainability issues are for Merton. These are set out alongside the corresponding sustainability objectives in Table 3.

Developing the SA Framework (Task A4, Table 3)

2.2.13 The framework that is used to appraise the Core Strategy DPD consists of sustainability objectives, indicators and targets. These three elements have been identified by the process of preparing the initial Scoping Report (2006) and through subsequent consultation. The 21

- sustainability objectives set out in Table 2 represent a revision of the objectives, but have incorporated all of the original subjects.
- 2.2.14 Sustainability objectives were tested against each other for compatibility in the Scoping Report 2006 (original 15 topic areas) and in the Scoping Report Refresh 2008 (21 sustainability objectives). The outcome of this exercise highlighted that it is not possible to consistently avoid harm to all objectives when seeking to achieve others. Potential conflict does not indicate that objectives should be changed, but raising awareness can help identify alternatives which may have less harmful impacts and can also help maximise benefits where two or more objectives are mutually beneficial.
- 2.2.15 Significant issues arising include the fundamental conflict between social and economic development and harm to habitats; the difficulty in determining whether a focus on using previously developed land may have an adverse or beneficial impact on congestion and, consequently, air quality; and the potential increased cost of using previously developed land could affect viability of delivering affordable homes.

Table 2. SA Framework

Sustainability	Indicators and targets (source of data in brackets)			
objectives	Indicators and targets (source of data in brackets)			
Climate Change	National Indicator 188: Planning to adapt to climate change seeks to embed			
	the management of climate change by assessing risks and opportunities;			
	taking action in any identified priority areas; develop an adaptation strategy and action plan and implement, assess and monitor the actions on an ongoing			
	basis. Evidence will be required that the local authority has put in place a			
	mechanism for proactively managing climate risks and opportunities in their			
	decisions, plans and measures on the ground.			
	For climate change gas emissions – see SA Objective 2 and SA Objective 9.			
	For water resources see SA Objective 7.			
2. Energy and Carbon	Renewable energy capacity			
Reduction				
	National Indicator NI 186: per capita reduction in CO ₂ emissions in the LA area			
	(www.decc.gov.uk); emissions of CO ₂ to be reduced by 60% of 1990 levels by 2025 (London Plan) and 80% by 2050 (Climate Change Act 2008)			
	2025 (London Flan) and 60% by 2030 (Climate Change Act 2006)			
	The Home Energy Conservation Act 1995 requires an improvement in energy			
	efficiency, as measured in the annual HECA report, of 30% 2006 - 2011.			
3. Biodiversity	95% of SSSIs to be in favourable or recovering status.			
	Increase coverage of Sites of Importance to Nature Conservation			
	(www.gigl.org.uk)			
4. Access to Nature and	There should be no areas deficient in access to open space (Merton Open			
Open Space	Space Study).			
5. Natural Resources	Number of contaminated sites			
	See SA Objectives 2, 6, 7, 9 and 10.			
6. Waste	Reduce waste, increase recycling:			
	National Indicator 191: Residual household waste per household. The targets			
	for this indicator, in Merton, are 733 kg/hh by 2008/09, 712 kg/hh by 2009/10			
	and 716 kg/hh by 2010/11			
	National Indicator 192: Household waste reused, recycled and composted			
	National Indicator 193: Municipal waste land filled			
7. Water Quality and	Improve the biological and chemical status of the River Wandle and Beverly			
Resources	Brook to good by 2027 (Environment Agency)			
	water consumption (www.defra.gov.uk Sustainable Development Indicator 16			
8. Flooding	Compliance with PPS25			
	National Indicator 189: the percentage of agreed actions to implement long-			
	term flood and coastal erosion risk management plans that are being undertaken satisfactorily. This refers specifically to the Thames Catchment			
	Flood Management Plan (CFMP) which focuses on flooding from rivers and			
	the Thames Estuary 2100 (TE2100) Plan which is concerned with flooding			
	from the sea.			

9. Air Quality	Meet the United Kingdom National Air Quality Strategy Standards:
40 1	Benzene 5 mg/m3 Annual Mean 31 Dec 2010; 1, 3 Butadiene 2.25 mg/m3 (1 ppb) Running Annual Mean 31 Dec 2003; Carbon Monoxide 10 mg/m3 Daily Maximum Running 8 hour mean 31 Dec 2003; Lead 0.25 mg/m3 Annual Mean 31 Dec 2008; Nitrogen Dioxide 200 mg/m3 (105 ppb) not to be exceeded more than 18 times a year (1 hour mean) 40 mg/m3 (21 ppb) Annual Mean 31 Dec 2005 31 Dec 2005; Particles (PM10) 50 mg/m3 not to be exceeded more than 35 times a year (24 hour mean) 31 Dec 2010, 23ug/m3 Annual Mean 31 Dec 2010, 20ug/m3 24 hour mean Annual mean 31 Dec 2015; Sulphur Dioxide 125 mg/m3 (47 ppb) not to be exceeded more than 35 times a year (15 minute mean) 31 Dec 2005.
10. Land Use	60% of development on previously developed land
11. Health and Well-being	Increase population within 0.5 miles (0.8km) of a health centre.
	Life expectancy at birth
	50% reduction in people killed or seriously injured (KSIs)
	60% reduction in child KSIs by the year 2010
12. Poverty and Social	Address issues raised by Index of Multiple Deprivation data
Inclusion	(www.defra.gov.uk)
	Increase population within 0.5 miles (0.8km) of community/leisure facilities.
	Reduce fuel poverty (NI 187) (www.decc.gov.uk)
	Income Support Claimants (<u>www.statistics.gov.uk</u>)
13. Diversity and equity	Comply with the Statement of Community Involvement
14. Basic Needs	Access to resources, housing and essential services.
	See Appended Maps, SA Objective 15 and SA Objective 19
15. Transport	Improve accessibility by all modes
	Improve public transport accessibility (MBC)
	33% reduction in the number of trips by road
16. Culture, Leisure and Social Activities	Increase population within 0.5 miles (0.8km) of cultural and community/leisure facilities
	See SA Objective 4 and SA Objective 17.
17. Historic Environment	Reduce heritage buildings at risk (English Heritage)
	No loss of Listed Building, Historic Park and Garden or Scheduled Ancient Monument
	Number of Conservation Area Appraisals
18. Crime and fear of crime	Maintain low rates of crime and reduce fear of crime
	Merton Borough Council Annual Resident's Survey
19. Housing	Meet housing need

	To deliver an additional 320 dwellings per year Affordable Housing: • Seek 40% affordable housing provision on sites capable of accommodating 10 or more dwellings; and, • To seek a target of 20% affordable housing provision equivalent (provision will be accepted as a cash in lieu payment), for sites below the 10-unit threshold (1 to 9 units).
20. Education and Skills	Increase educational attainment and improve skills match to employment:
	Number of pupils getting grades A-C at GCSEs (www.dcsf.gov.uk)
	People achieving NVQ Level 4 and above (www.nomisweb.co.uk)
21. Work and the economy	Provide employment land and support access to employment
	Number and proportion of economically active employed and number and proportion of people unemployed (www.nomisweb.co.uk)

Table 3 Key issues

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Sustainability objectives	Key issues
1. Climate Change	Climate change is a threat to the lifestyles of Merton residents and to wildlife, cultural heritage and material assets. It is predicted that higher temperatures and lower rainfall may be experienced in the south east. In addition to drinking water shortages, falling groundwater levels could lead to increased risk of subsidence and, where heavy rain falls on a parched ground in late summer the risk of flooding could increase. Green roofs, rain water harvesting, water storage, sustainable drainage and passive cooling are measures that will be necessary
2. Energy and Carbon Reduction	The London Plan seeks exemplary approaches to waste, energy and water use, management and provision. Merton has been in the forefront for developing strategy for carbon reduction through the 'Merton Rule' and is keen to explore how this can be further progressed. Design measures introduced to address climate change will also help improve energy efficiency (see above)
3. Biodiversity	Merton has a rich wealth of habitats and species that should be protected from development and climate change and enhanced where possible. The London Plan seeks improved quality of the public realm and to see the creation a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.
4. Access to Nature and Open Space	Merton enjoys an excellent provision to open space especially existing commons and along the river Wandle but there is scope for increasing the opportunity for contact with nature and open space and improving the quality of the public realm. The London Plan seeks improved quality of the public realm and to see the creation a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.
5. Natural Resources	There is a finite level of resources that need to be distributed over a larger population and housing level
6. Waste	There is a need to identify new facilities to accommodate a move away from land filling waste.
7. Water Quality and Resources	Climate change, population growth and lifestyle choices are increasing the amount of water used and affecting the quality of the river Wandle, Beverly Brook and their tributaries.
8. Flooding	Merton experiences flooding from a number of sources especially fluvial flooding from the river Wandle, Beverly brook and their tributaries.
9. Air Quality	There is further scope to reduce atmospheric pollution across the borough by supporting public transport, cycling and walking and more sustainable design in homes and commercial buildings.
10. Land Use	Merton is a highly urbanised area and development should be prioritised in town and local centres, on previously developed land and with good accessibility.
11. Health and Well-being	There are large disparities in health and well-being across the borough which could be exacerbated by the implications of climate change.
12. Poverty and Social	There are clear disparities in income and access to social

Inclusion	infrastructure between the Eastern and Western part of the		
	borough.		
13. Diversity and equity	Merton has a wide cultural, ethnic, faith based and racial diversity.		
14. Basic Needs	There is increasing importance in delivering affordable access to food, water, shelter and fuel.		
15. Transport	Accessibility to key services, facilities, employment, goods and other amenities is uneven across Merton. Improved public transport and cycling and walking provision are essential. The London Plan specifically promotes improvements in the national rail network; improved orbital movement by public transport, including Croydon Tramlink extensions; and improve access to Heathrow support the strategic co-ordination of the development corridor from Croydon to Gatwick.		
16. Culture, Leisure and Social Activities	Opportunities for culture, leisure and recreation need to be readily available to all in Merton, building on existing facilities in the borough and capitalising on Merton's role at the Olympics.		
17. Historic Environment	The quality of Merton's listed buildings and conservation areas should be protected from increasing pressure and competing land uses and climate change. Improve understanding and interpretation about archaeology and historic open space. A better understanding of whether retrofitting or replacement is appropriate to achieve heritage objectives and reduced emissions over the anticipated life cycle. Potential to enable many employment options and improve educational attainment		
18. Crime and fear of crime	Building on low crime figures and creating safer and secure communities for all in the borough.		
19. Housing	Currently there is a difference in affordability, level of provision, quality, environmental performance, design and distribution of housing within the Borough. The London Plan seeks to deliver housing provision complemented by adequate social and other infrastructure. The provision of affordable is a priority.		
20. Education and Skills	There is a miss match of skills and employment in the borough. This can be addressed by providing/enhancing opportunities for learning, education and accessing wider choice of jobs.		
21. Work and the economy	There are disparities in employment levels in the Eastern and Western parts of the Borough. The London Plan seeks strengthening of the economic linkages to central London and has identified Opportunity Areas and Areas for Intensification (Policies 5E.2 and 5E.3) to provide a focus. The London Plan also seeks stronger Metropolitan town centres and to encourage sensitive restructuring to reflect changes in the office market and the need for a range of economic activities and housing.		

2.3 Appraisal

- 2.3.1 The Appraisal has progressed in stages alongside the preparation of the DPD. Having established and verified, through consultation, the scope of the appraisal the first task was to consider the sustainability credentials of the objectives of the DPD and emerging issues and options. In addition to appraisal against the SA Framework, a Habitats Regulations Assessment⁴ has been undertaken. This has informed the appraisal of the DPD with respect to biodiversity objectives. The findings of Habitats Regulations Assessment are summarised in the following section, Section 3, of this SAR.
- 2.3.2 The Appraisal of issues and options and HRA has informed the development of preferred options for the DPD and, ultimately the submission Core Strategy DPD. An iterative process has been followed whereby initial appraisal of emerging options was undertaken and reported alongside the various consultations on the emerging DPD, as set out below. This process corresponds to Stage B as set out in Table 2.
 - Spatial Options consultation in November 2006
 - Preferred options in July 2007
 - Draft Core Strategy in October 2009
- 2.4.1 The sustainability appraisal reports listed above provide an account of each stage of the appraisal process. This Sustainability Appraisal Report draws final conclusions on sustainability issues and sets out the key findings with respect to proposals and policies in the DPD. The SAR also provides a summary of the process and information that supports appraisal and constitutes Stage C of the process as set out in Table 2. Since the DPD has been revised following public consultation, this SAR also corresponds to Stage D of the process.
- 2.4.2 In providing an account of the whole process it specifically meets the requirements of Article 5 of the SEA Directive which requires the preparation of an Environmental Report.

⁴ A consideration of the likely impact on Natural 2000 Sites as required by the EC Council Directive on the Conservation of Habitats and of Wild Fauna and Flora 92/43/EEC

3. Habitats Regulations Assessment

3.1 Regulation 48 Habitats Regulations Assessment of the DPD

- 3.1.1 The EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats & of Wild Flora & Fauna) passed in to domestic law by way of the Habitats Regulations (Conservation (Habitats &c) Regulations, 1994). As a consequence, any proposal that is not part of a specific management prescription that might have a significant effect on a Natural 2000 site must be subject to Appropriate Assessment.
- 3.1.2 Regulation 48 of the Habitats Regulations responds to the provisions of Article 6 (3) and (4) of the Directive which sets out provisions for determining whether the plan is likely to have a significant effect on the integrity of a Natural 2000 Site, including Special Protection Area, Ramsar sites and Special Areas of Conservation.

3.2 Habitats Regulations Assessment Screening

- 3.2.1 The Habitats Regulations identifies Merton Council as the Competent Authority that is responsible for deciding whether adverse effects are likely. The Council has consulted with Natural England, which is the Government's advisor in this respect.
- 3.2.2 A consideration has been made of the objectives, policies and proposals of the DPD against the conservation objectives for Natural 2000 sites and this is provided as Appendix E of this SAR. Whilst the screening process has determined that it is not likely that the DPD would lead to any adverse impact on the integrity of Natural 2000 sites, emerging issues have informed sustainability appraisal:
 - Wimbledon Common Special Area of Conservation, 1.5km to the north west of Wimbledon town centre has been designated primarily to protect the Stag Beetle Lucanus cervus. It is also an important example of two habitats: Northern Atlantic wet health with Erica Tetralix and European dry heaths;
 - Richmond Park Special Area of Conservation, west of Wimbledon is also designated to protect the Stag Beetle. The Royal Park is closed every night at dusk;
 - Air pollution can have an adverse impact on the habitats and/or stage beetle, however it is not considered to be detrimental to the conservation objectives of the SACs;
 - Recreation can have an adverse impact on the habitats and/or stage beetle, however it is not considered to be detrimental to the conservation objectives of the SACs.

4. Predicted impacts

4.1 Local Development Framework and Core Strategy DPD

- 4.1.1 The Merton Local Development Scheme sets out the intention and a timetable for the preparation of Local Development Documents for the Borough with the purpose of establishing a planning framework that provides a spatial strategy, site-specific proposals and policies to guide development control decisions:
 - Core Strategy DPD
 - Site Specific Allocations DPD
 - Proposals Map
 - Development Control Policies DPD
- 4.1.2 The Core Strategy DPD, the subject of this SAR, sets out the broad policy context and spatial strategy for the borough, building on the London Plan 2008. The Site Specific Allocations DPD will subsequently provide detailed development proposals for key areas identified in the Core Strategy. All this information will be presented on a Proposals Map. The Development Control Policies DPD will provide detailed policy to guide decisions about development proposals. The Site Specific Allocations DPD and Development Control Policies DPD will build on the Core Strategy and use this SAR as the context for their respective appraisals.
- 4.1.3 In addition, a Joint Waste Planning Development Planning Document is being prepared in partnership with the neighbouring boroughs of Croydon, Sutton and Kingston upon Thames. This SAR for the Core Strategy draws on the relevant findings of the appraisal of the emerging Waste DPD.
- 4.1.4 The Core Strategy DPD is concerned with the following issues. Appraisal of the proposed strategy and policies for each subject is set out in the next two sections:
 - Sub- area policies (including Colliers Wood and South Wimbledon, Mitcham, Morden, Raynes Park, Wandle Valley and Wimbledon).
 - Centres
 - Housing
 - Infrastructure
 - Economic Development
 - Open space, nature conservation, leisure and culture
 - Design
 - Climate Change
 - Flood Risk Management
 - Waste Management
 - Transport

4.2 Previous appraisal

- 4.2.1 The Core Strategy DPD must conform to and build on the London Plan. Whilst an updated plan has been published in 2008, the overall strategy remains the same for the South West Sub Region, the area in which Merton falls. It is proposed that 320 dwellings are delivered each year and that the Wandle Valley Corridor provides the focus for a regeneration corridor, including environmental as well as economic improvement. The Colliers Wood / South Wimbledon area is marked out as an area for intensification.
- 4.2.2 Key issues that have emerged from the appraisal of the London Plan that are relevant to Merton are:
 - efficient use of water resources;
 - · improving the water quality of rivers;
 - improving air quality
 - enhancing biodiversity
 - achieving a high quality built environment
 - · provision of housing, especially affordable housing
 - social and economic infrastructure
 - labour supply
- 4.2.3 Building on this spatial vision/strategy, a Sustainability Appraisal Report was published to inform the consultation on the Preferred Options DPD in July 2007. Of particular importance to the DPD preparation process was the consideration of three options for a spatial development strategy:
 - Option 1 Compact Merton, where all development would be high density in the most accessible areas
 - Option 2 Dispersed Merton, where development would be spread across all areas of the Borough evenly
 - Option 3 Rebalanced Merton, where development would be guided to locations where it could help address problems and away from areas where it would be less sustainable
- 4.2.4 This initial appraisal provided the basis for an account of the sustainability attributes of 20 policies covering housing, Retail and Town Centres, Natural Environment, Built Environment, Open Space, Sustainable Transport, Employment, Environmental Protection, Social Infrastructure.
- 4.2.5 Prior to the Preferred Options Stage, appraisal was undertaken of the DPD objectives, of strategic options and of specific subjects and this informed the preparation of the Preferred Options DPD. The process is documented in full in Appendix C. At the Preferred Options stage, therefore, a considerable level of scrutiny had been applied with respect to the sustainability attributes of the proposed spatial strategy and alternatives to it.
- 4.2.6 To ensue a comprehensive and robust process has been completed with respect to appraisal of the DPD, additional appraisal of Policies 2 to 7 was undertaken to accompany the consultation on the draft Core Strategy DPD in September -October 2009. Whilst these policies had largely emerged to address sustainability issues, this task was considered necessary to consider whether

any inconsistencies or conflict existed in terms of achieving all sustainability objectives together; and whether further measures could be undertaken to help maximise the sustainability credentials of the DPD.

4.3 Core Strategy Objectives

- 4.3.1 The Core Strategy objectives have been amended and re-organised since the initial appraisal in 2007. Table 4, over the page, illustrates a simple test of whether the seven plan objectives (below) are compatible with sustainability objectives.
- 4.3.2 The strategic objectives and spatial principles for the Core Strategy DPD have been guided by the London Plan objectives:
 - 1. promote social cohesion and tackle deprivation by reducing inequalities
 - 2. accommodate Merton's population change within its centres and residential areas, without encroaching on other spaces
 - 3. more prosperous with strong and diverse long term economic growth
 - 4. a healthier and better place for people to live and work in or visit
 - 5. an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place
 - 6. a well connected place where walking, cycling and public transport are the modes of choice when planning all journeys
 - 7. a well designed borough with an attractive urban and suburban environment
- 4.3.3 Testing the DPD objectives against sustainability objectives has identified that the overall strategy strongly supports sustainability. Two key strengths are that accommodating high density housing and employment use in existing centres would support the reuse of previously developed land, limiting the need to use Greenfield sites; and would support accessibility to services by more sustainable modes of transport. It will be through specific development proposals, however, where sustainability benefits can be maximised and where potential adverse impacts will need to be identified and, when possible, avoided. A key element of the Core Strategy DPD will be, therefore, the application of design criteria to ensure sufficient open space is accessible; that water management is effective in avoiding harm from flooding, avoiding pollution and reducing the volume used; and that the historic environment is protected and enhanced.
- 4.3.4 Close proximity of housing to services will provide strong sustainability benefits in terms of avoiding the need to travel, but the relationship is not simple since an over provision of services in one area or the wrong balance of housing to services could contribute to increased congestion. Objective 3 provides a focus in this respect by seeking to deliver a more self sufficient local economy at the Borough wide and at the area level.
- 4.3.5 Of particular importance will be how the DPD builds on the objectives by offering clear direction with respect to delivering renewable and low carbon energy; making efficient use of natural resources; and promoting a better balance between education, skills and employment. The plan can also seek to maximise the multi functional role development plays in the delivery of benefits through good design that also supports health and well being. This would seek to deliver sustainable design that is compatible with and enhances heritage interests.

Table 4. Testing Core Strategy DPD Strategic Objectives against the SA Framework

SA Objective	1	2	3	4	5	6	7
1. Climate Change	+	+	+	+	+	+	+
Energy and Carbon Reduction	+	+	?		+	+	+
3. Biodiversity		+		?	+		+
Access to Nature and	+	?		+	+	+	
Open Space							
5. Natural Resources		+	?		+	+	
6. Waste		+	?		+		
7. Water Quality and		?	?	?	+		
Resources							
8. Flooding		?	?	?	+		
9. Air Quality		?	?			+	
10. Land Use		+	+		+		
11. Health and Well-being	+	+	+	+	+	+	+
12. Poverty and Social	+	+	+	+	+	+	
Inclusion							
13. Diversity and equity	+	+		+	+	+	
14. Basic Needs	+	+	+	+	+	+	
15. Transport	+	?	?			+	
16. Culture, Leisure and Social Activities	+	+	+	+	+		+
17. Historic Environment		?	?	+	+		+
18. Crime and fear of	+			+	+		+
crime							
19. Housing	+	+					
20. Education and Skills	+	+	?	+		+	
21. Work and the	+	+	?	+		+	+
economy							

Key

positive relationship	+
Uncertain	?
negative relationship	-
no strong correlation	

4.3.6 The issues arising from this rudimentary level of appraisal are taken forward in the account of the appraisal of area specific proposals and strategic policies in the submission DPD; this is presented in the following section. It is noted, however, that the Core Strategy vision addresses issues in the Borough and this responds to many of the issues arising from compatibility testing:

- Reducing the impacts of climate change in Merton, including promoting high quality sustainable development, enhancing energy efficiency and encouraging more sustainable transport modes;
- b) Improving 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.
- c) Regenerating Morden District Centre to provide improved quality and quantity of commercial, residential and leisure uses in an attractive suburban setting;
- d) Creating a thriving, attractive and coherent district centre at Colliers Wood, addressing flood risk comprehensively and facilitating an improved range of town centre uses;
- e) Ensuring Wimbledon Town Centre continues to develop and maintain its position, offering excellent cultural, shopping and business facilities;
- f) Protecting and enhancing Merton's green character and historic environment;
- g) Promoting a diverse and resilient local economic base, supporting Wimbledon as the borough's Major Centre and building on Merton's strengths in location, attractiveness, brand value and expertise;
- h) Maintaining and improving local centres at Arthur Road, North Mitcham, Motspur Park, Raynes Park and Wimbledon Village, and neighbourhood parades, and improving the public realm throughout the borough;
- i) Supporting local community life through education and employment opportunities, cultural and sporting assets, community services, recreational activities and other infrastructure that meets local needs:
- j) Recognising Merton's valued suburban and urban character when providing a mix of new homes, including family homes;
- k) Making Merton an easy place to get to and around by walking, cycling, public transport and road;
- Reducing the impacts of flooding, waste disposal, travel congestion, energy costs and utilities infrastructure.

4.4 Likely effects of implementation of the Plan

- 4.4.1 This section of the SAR provides an account of the consideration of all proposed policies in the submission DPD and has been undertaken in the context of the key issues raised by other relevant documents (see Appendix A) and the baseline of environmental, social and economic conditions in the Borough.
- 4.4.2 It is noted that the SEA Directive, Annex1, point g requires a description of the measures envisaged to prevent, reduce and as fully as possible offset any <u>significant adverse</u> effects on the environment of implementing the Core Strategy DPD.

Policy 1 – Colliers Wood and South Wimbledon Sub-area

- 4.4.3 The inclusion of Colliers Wood as a District Centre, elevating its previous status from an Urban Centre, supports the creation of a more self-sufficient neighbourhood and the improvement of transport infrastructure such that people can make more sustainable choices. The provisions of the transport policies (Policy 18, Policy 19 and Policy 20) are important since they can help reduce the number of trips by car made by people living outside the centre to Colliers Wood.
- 4.4.4 Policy 1 will rely on Policy 10, Policy 13, Policy 14, Policy 15 and Policy 16 to ensure a green infrastructure approach is central to project level proposals. This would emphasise that the

provision of open/ green space will need to be delivered through the process of planning the layout of development and design to include the integration of multi-functional green spaces which address climate change, energy, flooding, walking and cycling and link to initiatives proposed through Policy 5 (Wandle Valley).

4.4.5 Appraisal indicates that Policy 1 strongly supports sustainability and this is reflected in the designation by the London Mayor as an area for intensification. The Level 2 SFRA confirms, however, that the Colliers Wood is within Flood Zone 2 and flood risk assessment may be required for major development proposals. For housing it would need to be demonstrated that the sequential and exceptions tests of PPS25 could be met.

Alternatives not taken forward

4.4.6 Not including Colliers Wood would be incompatible with key objectives in the London Plan which seeks to achieve regeneration along the River Wandle corridor.

Policy 2 – Mitcham Sub-area

- 4.4.7 Policy 2 can make a major contribution to sustainability by consolidating public transport provision via Mitcham Eastfields, the tram service to south of town centre, and connecting Pollards Hill to key transport modes. Improved access to services will help address multiple deprivation and socio-economic exclusion. It is a specific objective of the policy to secure environmental improvement. Together with accessibility improvements, the strategy strongly supports the community.
- 4.4.8 In conjunction with Policy 15, all major development would be strongly encouraged to be compatible with a 'Multi-Utility Services Company' (MUSCo) where viable and actively contribute to the development of networks where possible. Due to the prohibitive costs of major infrastructure development there are no specific plans in this respect with the preference being for incremental growth across the Borough. The Mayor has designated Mitcham as an Energy Action Area and it is recommended that ongoing research and analysis seeks to identify the most effective strategy in terms of reducing carbon emissions.
- 4.4.9 Policy 2 seeks improvements to the public realm and access to green spaces. The provisions of Policy 14 and Policy 15 will be important in this respect.
- 4.4.10 The strategy seeks to improve the quality and mix of new dwellings in Mitcham, which is consistent with the requirements of Planning Policy Statement 3. This approach is considered to also be consistent with a desire to improve service provision since it could support a stronger local economy.

Alternatives not taken forward

4.4.11 Not including Mitcham would be incompatible with the key objective of moving towards more sustainable patterns of transport and would be likely to miss opportunities to address income and employment deprivation in the borough.

Policy 3 - Morden Sub-area

- 4.4.12 Policy 3 can make a major contribution to sustainability by increasing the resident population who can benefit from the excellent public transport provision at Morden. The current housing offer for the area is dominated by suburban housing. Policy 3 seeks to improve the quantity, quality and mix of housing through the intensification of residential development in the town centre. This will be achieved through an Area Action Plan for Morden. Increasing the residential population will increase spending power and thus create a more balanced and cohesive community. Additional population within the centre itself will improve viability of existing businesses and services, helping to sustain facilities in the future and improve self-sufficiency.
- 4.4.13 Whilst the policy area is not the subject of flood risk, climate change predictions suggest a greater frequency and/or intensity of heavy rain events and measures to hold water up such as water butts and green roofs have an important role. The provisions of Policy 10, Policy 13, Policy 14, Policy 15 and Policy 16 will ensure a green infrastructure approach is central to project level proposals, based on delivering benefits with respect to numerous objectives including well being, water management, biodiversity and climate change.

Alternatives not taken forward

4.4.14 Not including Morden would be incompatible with the key objective of moving towards more sustainable patterns of transport and would be likely to miss opportunities to address income and employment deprivation in the Borough.

Policy 4 - Raynes Park Sub-area

- 4.4.15 The overall strategy for the borough is to improve self-sufficiency of key centres and accessibility.
- 4.4.16 Whilst the Raynes Park area benefits from good accessibility to large areas of open space, a key issue is improving the environment and public realm and consolidating the identity and character of an area split by a railway line and road. It is appropriate, therefore, that policy seeks to deliver an improved environment and street scene including measures to ease pedestrian movement and reduce traffic. In the wider area the policy of restricting further 'out of centre' development will help consolidate this approach.
- 4.4.17 With a mix of unit styles and quality, day to day grocery shopping and community facilities including a library and health centres, Raynes Park requires some business function within the local centre so that its employees can help support other local shops, restaurants and cafés during the day. The provision of more housing could further support this strategy.
- 4.4.18 The Flood Risk Management Policy provides further guidance and criteria that will ensure that flood risk and green infrastructure are addressed in new development proposals.

Alternatives not taken forward

4.4.19 Not including Raynes Park would be incompatible with the key objective of moving towards more sustainable patterns of transport and may limit the opportunity to maximise affordable housing at this highly accessible location.

Policy 5 - Wandle Valley Sub-area

- 4.4.20 The Wandle Valley Corridor encompasses several town centres, local centres and business areas and is identified as a strategic corridor for regeneration. It falls within a wider corridor of national importance, identified in the London Plan and draft South East Plan, in which the Wandle Valley Corridor provides a particularly important set of development opportunities. In Merton, the London Plan has identified an Area for Intensification at Colliers Wood/South Wimbledon.
- 4.4.21 It is proposed to consolidate and improve the management of green spaces in the Wandle Valley Corridor to provide a strong identity as a regional park. It is considered that in combination with Policy 10, Policy 13, Policy 14, Policy 15 and Policy 16 this will provide a strong basis for a green infrastructure. This will complement measures outside the planning system such as the Business Improvement status programme.

Alternatives not taken forward

4.4.22 Not including the Wandle Valley area would be incompatible with key objectives in the London Plan which seeks to achieve regeneration along the Wandle Valley Corridor.

Policy 6 - Wimbledon Sub-area

- 4.4.23 In order to meet the borough's need for retail, leisure and other town centre uses major development is required in Wimbledon. An appropriate balance of uses, maintaining and consolidating existing town centre uses is sought to strengthen the business and retail core of the town centre and develop complementary uses. Wimbledon Village will continue to operate as a Local Centre as it is favoured by unique comparison retailers, cafés and restaurants over grocery shopping and attracts visitors from a wider hinterland than most local centres.
- 4.4.24 A significant proportion of Wimbledon residents work in central London, utilising good public transport connections, and this will be consolidated by the provision new housing where possible. High density mixed use development in Wimbledon town centre can support the District Heat and Power network although this may be limited in the short term due to space and viability. Through the provisions of Policy 14 and Policy 15 new development in Wimbledon should be compatible with future expansion of renewable and low carbon energy schemes established in Morden and Mitcham.
- 4.4.25 Whilst the area is not high risk with respect to flooding, climate change predictions indicate a need to improve the ability to hold up rain during flash flood events. Measures such as green roofs and water butts would not only address this but also improve water efficiency and energy efficiency as well as providing open space. These measures are particularly important in high density development. It is considered that in combination with Policy 10, Policy 13, Policy 14, Policy 15 and Policy 16 will provide a strong basis for a green infrastructure approach which can incorporate open space nature conservation and an improved public realm.

Alternatives not taken forward

4.4.26 Not including Wimbledon would be incompatible with the key objective of moving towards more sustainable patterns of transport and may limit the opportunity to maximise housing, employment, business culture and leisure at this highly accessible location.

Policy 7- Housing Choice and Policy 8 – Housing Provision

4.4.27 Making provision for those in need of affording housing provision will have a significantly positive impact in terms of social inclusion, health and well being. Policy 8 will supports the provision of well designed socially mixed housing. Policy 7 encourages the provision of a mix of housing types, sizes and tenures, including affordable housing. Policy 14 and Policy 15 will provide the basis for ensuring high quality design that does not adversely affect heritage and that addresses climate change and fuel poverty.

Policy 9 – Accommodation for Gypsies and Travellers

4.4.28 This policy makes a positive contribution to equality impact by helping to provide for Gypsies who are a minority group in the borough and find it hard to find land available for their needs. It also contributes positively to sustainably built development objectives.

Policy 10 – Infrastructure

- 4.4.29 The strategy seeks to address social inclusion by encouraging new infrastructure in the most appropriate areas of particular need. The baseline analysis of infrastructure requirements in the borough, undertaking in 2008, will inform the approach.
- 4.4.30 The Council does not envisage any infrastructure needs that cannot be overcome, however are keen to ensure new development is supported by appropriate infrastructure.

Policy 11 – Centres

- 4.4.31 Appraisal of three strategic options for development found that whilst all options had positive and negative impacts, the greatest benefits would be likely through Option 3, a rebalancing strategy. As reported in the Preferred Options Core Strategy DPD SAR, appraisal identified that in seeking to achieve a better balance with respect to the location of housing to employment, services and facilities would have the greatest benefits to reducing the need to travel and providing community and leisure services for residents. Option 3 emphasised the importance of the diversity of employment.
- 4.4.32 Policy 11, the centres policy, draws on this approach and sets it in a spatial context for the Borough by seeking to maintain and improve the vitality and viability of existing town centres and key retail parades. Social and economic benefits would be particularly strong, including employment opportunities, economic development and the provision of services where they can support a reduction in the need to travel further afield. The strategy provides the basis to mitigate the negative impacts of waste and carbon emissions that are associated with development.
- 4.4.33 The strategy would avoid harm to environmental interests although enhancing the environment, including biodiversity, would require a strong steer from development control policy and specific area proposals.
- 4.4.34 The predicted levels of retail growth have been the subject of Town Centre Capacity Studies completed in 2005 and 2008. It is on this basis that the appraisals of individual centres that will

contribute to the strategy have been appraised (see Policy 1 to Policy 6, below). It is noted that the Council are seeking to re-designate Colliers Wood as a District Centre and the predicted impacts for that area are considered under the respective headings, below.

Alternatives not taken forward

- 4.4.35 Option 1 and Option 2 considered whether a more appropriate spatial approach would be either growth concentrated in fewer centres or to disperse growth not only in all the main settlements identified in Policy 1, but substantial growth in other, smaller settlements.
- 4.4.36 Option 1, 'Compact Merton' was found to offer the greatest benefits in terms of using previously developed land, but was the most likely to have a significant negative impact with respect to traffic congestion, and air, noise and light pollution. A second benefit was identified in that it could provide the greatest increase in affordable housing at suitable locations, but may have the greatest negative impact in terms of putting additional pressure and infrastructure and services, including local shopping and valuable open space in the main settlements.
- 4.4.37 Option 2, 'Dispersed Merton' was discounted on the basis that it was more likely to result in a less efficient pattern of transport; could have a negative impact on retaining jobs as a consequence of not maximising the opportunities offered by the best located employment sites; it would provide the least affordable housing; and the most inefficient use of land.
- 4.4.38 An account follows of the sub-area locations. The reasons for including the location and sustainability attributes of the proposed policy for that location are considered under the respective heading.

Alternatives not taken forward

4.4.39 Other centres have not been included on the basis that they would not be in keeping with the key objective of a more sustainable pattern of transport. Development is not precluded, of course, and this recognises the importance of good accessibility on foot to essential services.

Policy 12 – Economic development

4.4.40 Policy 12 seeks to protect existing commercial sites and will work alongside the overall spatial strategy to ensure that there is an adequate supply of employment sites in accessible locations where the need to travel by car is reduced. With an emphasis on diversification, the policy can work with Policy 14 and Policy 15 to ensure a strong response to the challenges of addressing the causes and consequences of climate change.

Policy 13 - Open Space, Nature Conservation, Leisure and Culture

- 4.4.41 Policy 13 seeks to protect and enhance the natural environment and reduce the borough's areas deficient in natural green space. The need to improve health equality by encouraging regular participation in sport and recreation and improving opportunities for culture, leisure and recreation are made available to all by improving access to and quality of open spaces. Working with Policy 14, Policy 15 and Policy 16 provides a strong platform to a co-ordinated approach to green infrastructure.
- 4.4.42 Enhanced habitats allow for greater conditions for flora and fauna, especially protected species.

- 4.4.43 Any development allowed, even for community uses will impact biodiversity, pollution and climate issues. If development is allowed by criteria, it is felt that there would not be a significant impact and these would be outweighed by the benefits to education, health provision and improved standards of open space and accessibility.
- 4.4.44 Research has identified that investment in green space will deliver better public health, both physical and mental. It can also help bring disparate communities together and provide critical green infrastructure in a changing climate for cooling, shading, floodwater storage and biodiversity. (Source: CABE, Public space lessons, 2008).

Policy 14 – Design

- 4.4.45 Appraisal of policies reported in July 2007 identified that design policy is an important element of the Core Strategy DPD since it can ensure a high quality built environment and public realm which will have positive social effects on public health, safety and travel. It is considered that high quality design will be essential to balancing protection of the historic environment with a green infrastructure approach that will address climate change and reducing carbon emissions.
- 4.4.46 Policy 14 and Policy 15 will work together in this respect. Area and site specific proposals will be encouraged with appropriate housing densities and mix of uses. Accessibility data and character assessment will inform the approach to tall buildings, ensuring that new tall buildings are clustered into existing centres at Colliers Wood, Morden and Wimbledon.

Policy 15 – Climate Change

4.4.47 Policy 15 is the key driver for addressing climate change by seeking to avoid actions that will generate environment, social and economic harm, and to enhance energy efficiency. Wider sustainability benefits will also be derived from energy affordability, less pollution and, consequently, improved health and reduced resource scarcity.

Policy 16 – Flood Risk Management

4.4.48 At the strategic level, the Core Strategy has been informed by a Flood Risk Assessment. In addition, Policy 16 Flood Risk Management will ensure individual development proposals will have no adverse impact and that essential community infrastructure will be at less risk of damage.

Policy 17 – Waste Management

4.4.49 The Joint South London Waste Plan has been the subject of separate appraisal. The Policy 17 of the Core Strategy DPD sets the direction for that Plan by supporting greater self sufficiency and recycling. This strategy will reduce the need for landfill and the distance waste travels to be processed. Whilst this is beneficial in a global sense, the requirement for sites will raise amenity issues that would need to be addressed in accordance with policies in the Joint South London Waste Plan.

Policy 18 – Active transport

4.4.50 Encouraging active transport would have a strongly positive effect. Active transport generates health benefits from increased levels of physical activity and less pollution as a result of a reduction in travel by car. Promotion of active transport will also improve equity as it will help those who do not have a car and it will help improve access to areas of the Borough that were previously not so accessible, in particular in the east of the borough.

Policy 19 – Public transport

4.4.51 Improving public transport is a key element of the Core Strategy. Improving public transport will encourage alternatives to car use and would have a very positive implications, such as reductions in pollution, congestion and the amount of travel by car. Public transport improvements also have positive impacts on equity for those who do not have access to a car, as well as improving accessibility across the borough (in particular the eastern wards).

Policy 20 - Parking, servicing and delivery

4.4.52 Improving the experience for pedestrians and cyclists combined with enforcing maximum restraint based car parking standards and encouraging permit free development, help reduce the amount of travel by car. Although Merton Council wishes to promote alternative travel modes to private car, the council will not limit car parking so much that it restricts people's freedom to own and travel by car, as this would be inconsistent in terms of social inclusion.

4.5 Summary of influence of appraisal on the DPD

- 4.5.1 The process of sustainability appraisal has involved consideration against sustainability objectives of issues and options and initial DPD objectives; of Preferred Options; and of the submission DPD. Appraisal can be demonstrated, therefore, to have informed each stage in the preparation of the plan with respect to the likely impacts on environmental, social and economic interests. The consultation process and various stages are identified in Appendix C.
- 4.5.2 The findings of appraisal have been used to help define the most sustainable spatial strategy in terms of where most growth will occur; the most sustainable ways in which to pursue growth in those locations; and guiding policy principles for ensuring sustainable development is at the heart of decisions relating to individual development proposals
- 4.5.3 The process of appraisal has identified priorities that need to be addressed to ensure a more sustainable approach to development and these have been incorporated into the area specific proposals and policies. The plan seeks to ensure that development proposals will maximise sustainability attributes. The agenda that is thus set can be picked up by subsequent Local development Documents including the site allocations DPD and Development Control Policies DPD. This is considered in the following section.

4.6 Recommendations for further action

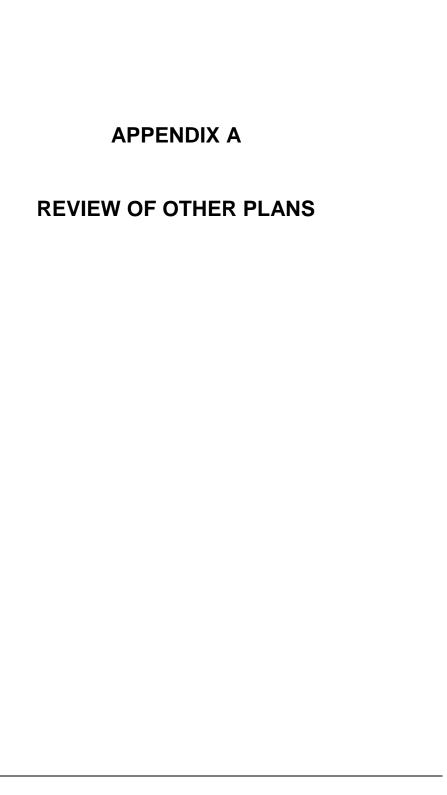
4.6.1 The Site Allocations DPD offers the opportunity to take forward the area specific proposals in a manner that maximises the benefits to sustainability and avoids adverse impacts. The areas selected as the focus for growth are inherently the most sustainable on the basis that as a

- network of centres well connected by rail and bus they support a more sustainable pattern of transport. The balance of development in terms of housing, retail, leisure and commercial must be appropriate to reinforce the ability of residents to avoid travelling by car.
- 4.6.2 Issues such as flood risk and income deprivation need to be addressed at some locations. To this end, the findings of this appraisal can be used to inform where priorities exist. In some areas this will be diversity of employment opportunities, in others it may be access to learning. In all areas, site specific proposals will need to set an overarching policy framework for delivering high quality public realm that enhances heritage whilst ensuring the climate change agenda is addressed and that biodiversity can be enhanced.
- 4.6.3 The Infrastructure Needs Assessment identifies the most important infrastructure needs for the borough as primary schools (especially in north Wimbledon), transport improvements and healthcare. This and other findings of the INA will inform the Site Allocations DPD. It is not anticipated that there will be any significant infrastructure obstacles in terms of water, drainage and sewage provision for development over the core strategy period
- 4.6.4 A flexible approach may be necessary with respect to the benefits of development. A priority has been identified in the London Plan for affordable housing. The proposals for each site will draw on the Housing Strategy for the Borough as well as viability information to ensure this can be maximised as appropriate for the location whilst clarifying the importance and scope of other benefits for the location in question.
- 4.6.5 The Development Control Policies DPD will build on the strategic policies in the Core Strategy DPD. Of particular importance will be how design solutions can ensure the integration of green infrastructure across the Borough and how a flexible approach to renewable energy and energy efficiency might allow the maximum benefits.

5. Monitoring

5.1 Proposed Monitoring regime

- 5.1.1 Table 2, Section 2 identifies a set of indicators and targets that correspond to the 21 sustainability objectives. All of the indicators will be monitored through the Local Development Framework Annual Monitoring Report and some will be update each time a document in the LDF evidence base is reviewed and published. In addition, supplementary Scoping Reports will be prepared to inform subsequent Local Development Documents, as detailed in the LDS, although this may only cover a narrower subject area and/or a smaller geographical area depending on the LDD in question. The indicators will be partially and informally monitored in this way, but a full update of the indicators and sustainability appraisal will be undertaken at least every five years and/or as part of the next review of the Core Strategy DPD, whichever is the sooner.
- 5.1.2 The current baseline situation is provided in Appendix B.



The following is a review of relevant policies, plans, programmes, and sustainable development objectives that may affect or influence the LDF. The objectives and requirements have informed the development of the sustainability appraisal framework and have informed appraisal.

International

Plan/Programme	Objectives/requirements
EU Sixth Environmental Action Programme	The 6EAP sets the environmental objectives and priorities that will be an integral part of the EU Sustainable Development Strategy. Four priority areas for action: - Tackling climate change - Protecting nature and Biodiversity - Environment and Health - Sustainable use of natural resources and
	management of waste.
European Sustainable Development Strategy, May 2001	Focuses on the need to: Limit climate change and increase the use of clean energy Address threats to public health (e.g. hazardous chemicals, food safety) Combat poverty and social exclusion Deal with the economic and social implications of an ageing society Manage natural resources more responsibly (including biodiversity and waste generation) Improve the transport system and land use management
UN Convention on Human Rights www.hrweb.org/legal/undocs.html	International agreement on human rights which details basic civil and political rights of individuals. Includes the right to the peaceful enjoyment of a dwelling, to privacy and protection of privacy by law. Freedom of opinion and expression.
Aarhus Convention 1998: The UN Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters http://www.unece.org/env/pp/	Establishes the right of everyone to receive environmental information that is held by public. The right to participate from an early stage in environmental decision-making. The right to challenge public decisions that have been made without respecting these rights.
European Directive Nitrates 91/676/EEC (1991) http://ec.europa.eu/environment/water/water- nitrates/directiv.html	Reduce water pollution by nitrates. The Environment Agency identifies Nitrate Vulnerable Zones, establishes and implement action programme with this aim.
European SEA Directive 2001/42/EC (2001) http://ec.europa.eu/environment/eia/sea-legalcontext.htm	Requires assessment of the effect of projects on the environment.
European Air Quality Framework Directive (2008/50/EC) http://ec.europa.eu/environment/air/quality/legislation/existing_leg.htm	Avoid, prevent or reduce concentrations of harmful air pollutants and limit values and/or alert thresholds set for ambient air pollution levels. Targets are set for sulphur dioxide, nitrogen dioxide, and oxides of nitrogen, particulate matter and lead in the UK Air Quality Strategy. New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target.
Council Directive 97/11/EC of 3 March 1997 amending Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment http://ec.europa.eu/environment/eia/full-legal-text/9711.htm	Requires assessment of the effect of projects on the environment.

Valetta Convention (European Convention on the protection of Archaeological Heritage) http://conventions.coe.int/Treaty/en/Treaties/Html/143.htm	Recognises importance and clarifies definition of archaeological heritage.
European Noise Directive 2000/14/EC http://ec.europa.eu/enterprise/sectors/mechanical/noise- outdoor-equipment/index_en.htm	Plan policies to support overall objectives and requirements of the Directive: strategic noise maps inform and consult public, measures to reduce noise. Regulations transposed into Environmental Health powers. PPG 24 includes Noise Exposure Categories. The production of a Noise Action Plan is not likely to be required given there are no major roads, railways or airports. Avoiding and reducing noise nuisance is, however, important to the tranquillity of the AONB.
Landfill Directive 99/31/EC (1999) http://ec.europa.eu/environment/waste/landfill_index.htm	The objective of the Directive is to prevent or reduce as far as possible negative effects on the environment from the land filling of waste, by introducing stringent technical requirements for waste and landfills.
EC Directive 2003/4/EC on public access to environmental information	Produce an Environmental Report to identify the likely significant impacts of the Management Plan on the environment.
European Directive on the Energy Performance of Buildings 2002/91/EC http://europa.eu/legislation_summaries/energy/energy_efficienc_y/127042_en.htm	Promote the improvement in energy performance of buildings, taking into account conditions, requirements and cost-effectiveness. The timetable and method for achieving this is established through the Code for Sustainable Homes and BREEAM. The baseline is set by Part L of the Building Regulations.
European Spatial Development Perspective, May 1999	The ESDP emphasises the importance of achieving, equally in all regions of the EU, the three fundamental goals of European policy: • economic and social cohesion; • conservation and management of natural resources and the cultural heritage;
Water Framework Directive 2000/60/EC	Reduce pollution of groundwater, enhance waterways and wetlands, use water in a sustainable way, lessen the effects of floods and droughts, protect and restore aquatic ecosystems. Environment Agency to prepare River Basin Management Plans by 2009 to promote sustainable water management. All inland and coastal waters to reach good ecological status by 2015.
European Waste Framework Directive (2006/12/EC) http://europa.eu/legislation_summaries/environment/waste_man agement/l21197_en.htm	To set up a system for the coordinated management of waste within the European Community in order to limit waste production. Member states must promote the prevention, recycling and conversion of wastes with a view to their reuse.
European Communities Directive on the Conservation of Wild Birds (79/09/EEC) The Birds Directive (EU, 1979) http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm	The long term protection and conservation of all bird species naturally living in the wild within the European territory of the Member States (except Greenland).
EC Council Directive on the Conservation of Habitats and of Wild Fauna and Flora 92/43/EEC (The Habitats Directive, 1992) http://www.jncc.gov.uk/page-1374	Conserve fauna and flora and natural habitats of EU importance. Establish a network of protected areas to maintain both the distribution and abundance of threatened species and habitats.

Kyoto Protocol	 Limit the emissions of 6 greenhouse gases including: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride. Reduce greenhouse gas emissions by 5% of 1990 levels by 2008-12. UK has an agreement to reduce emissions by 12.5% below 1990 levels by 2008/12 and a national goal to a 20% reduction in CO2 emissions below 1990 levels by 2010.
Universal Declaration on Cultural Diversity	Cultural diversity is as important for humanity as biodiversity is to nature

National Plans and Programmes

Plan/Programme	Objectives/requirements		
Sustainable Communities Act 2007	Grants the power to local authorities to develop planning policies which would assist with the objectives set out or Chapter 23 of the Act: provision of local services; goods and services that are produced within 30 miles; organic food; access by all local people to food that is adequate in terms of both amount and nutritional value; energy conservation; energy supplies produced within a 30 mile radius of the region; reducing the level of road traffic including measures to decrease the amount of product miles; social inclusion, including an increase in involvement in local democracy; increase mutual aid and other community projects; measures designed to decrease emissions of greenhouse gases; measures designed to increase community health and well being; and measures to increase the use of local waste materials for the benefit of the community. emphasises the provision of affordable housing as a key objective (Schedule 1)		
	Introduces a new system for nationally significant infrastructure planning alongside further reforms to the town and country planning system and the introduction of a Community Infrastructure Levy.		
Planning Act 2008 http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyimplementation/reformplanningsystem/planningbill/	The Planning Act also makes further reforms to the town and country planning system, including removing some minor procedures for development plan production; adding a duty on councils to take action on climate change in their development plans; and to have regard to the desirability of achieving good design; streamlining development control procedures; making changes to the appeals process; and adding transitional powers allowing regional assemblies to delegate some planning functions to regional planning bodies.		
	The Act also contains enabling powers to empower local councils to apply CIL on new developments in their areas to support infrastructure delivery. The CIL will establish a better way to increase investment in the vital infrastructure that growing communities need. Regulations will be made in April 2010.		
Planning and Energy Act 2008	The Act gives Local Planning Authorities a mandate to include policies and proposals that will secure energy efficiency improvements in excess of Part L of the Building Regulations; and to require that a proportion of energy used in development is energy from renewable sources in the locality of the development.		

Social progress which recognises the needs of everyone; Effective protection of the environment; Prudent use of natural resources: Maintenance of high and stable levels of economic growth and employment. Using sound science responsibly Principles: Living within environmental limits; a strong, healthy and just society; a strong, stable and sustainable economy; using sound science responsibly, ensuring Securing the Future: Sustainable Development Strategy for sound evidence supports policies; and promoting good the UK http://www.defra.gov.uk/sustainable/government/ governance. Priorities: sustainable consumption and production, climate change and energy, protection of natural resources and enhancement of environment, sustainable communities. Key indicators: GDP, investment in public, proportion of working age people who are in work, Qualifications at age 19, expected years of healthy life, homes judged unfit to live in, level of crime, emissions of greenhouse gases, days when air pollution is moderate or high, road traffic, rivers of good or fair quality, new homes built on previously developed land, waste arising and management, satisfaction with quality of life. A framework that promotes all areas of the UK working together on shared goals. Comprises: Shared understanding of sustainable development One future - different paths - UK's shared framework for Common purpose outlining what we are trying sustainable development to achieve and the guiding principles we all need to follow to achieve it. Our sustainable development priorities for UK action, at home and internationally Indicators to monitor key issues on a UK basis. Programme of action for delivering improved housing and communities, speed up planning, increased funding for Sustainable Communities Plan, 2003 affordable homes and key worker housing, new growth http://www.communities.gov.uk/communities/sustainablecommu areas, decent homes and homelessness, protecting nities/sustainablecommunities/ green belt and open space. Gives Local Planning Authorities a mandate to include policies and proposals that will secure energy efficiency improvements in excess of Part L of the Building Regulations. Reduction of CO₂, maintain reliability of energy supplies. a proportion of energy used in development in their area Planning and Energy Act 2008 to be energy from renewable sources in the locality of the http://www.opsi.gov.uk/acts/acts2008/ukpga_20080021_en_1 development; a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; Development in their area to comply with energy efficiency standards that exceeds the energy requirements of building regulations. To manage flood and erosion risk through an integrated UK Making Space for Water, 2005 portfolio of responses including land use planning. This act aims to prevent loss of diversity of flora and Wildlife and Countryside Act (1991), as amended by the fauna by making it illegal to intentionally damage wild Countryside and Rights of Way Act (2000) plants and animals or their habitats. http://www.opsi.gov.uk/Acts/acts2000/ukpga_20000037_en_20

Conservation (Natural Habitats, &c.) Regulations 1994 (SI 2716) http://www.opsi.gov.uk/si/si1994/uksi_19942716 en 1.htm	The Government's Public Service Agreement target: 95% by area of Sites of Special Scientific Interest will be in favourable (or unfavourable recovering) condition by 2010.
_	Regulation 48 requires screening of projects with respect to the need for Appropriate Assessment.
Climate Change Act 2008 http://www.decc.gov.uk/en/content/cms/legislation/cc_act_08/cc_act_08.aspx	Sets a legally binding target of at least an 80 percent cut in greenhouse gas emissions by 2050 and a reduction in emissions of at least 34 percent by 2020. Both these targets are against a 1990 baseline. Aviation and shipping emissions are include and the Act confers powers to introduce domestic emissions trading schemes more quickly and easily through secondary legislation; measures on biofuels; powers to introduce pilot financial incentive schemes in England for household waste; powers to require a minimum charge for single-use carrier bags (excluding Scotland). The Government will report at least every five years on the risks to the UK of climate change, and can require public bodies and statutory undertakers to carry out their own risk assessment and make plans to address those risks.
	Sets out the UK Government's five point plan to tackle climate change:
UK Low Carbon Transition Plan 2009	1. Protecting the public from immediate risk 2. Preparing for the future 3. Limiting the severity of future climate change through a new international climate agreement 4. Building a low carbon UK 5. Supporting individuals, communities and businesses to play their part
Biodiversity strategy for England	The UK Biodiversity Action Plan (UKBAP) is the UK response to the Convention on Biological Diversity (CBD which was signed at the Earth Summit in Rio de Janeiro. The plan describes the UK's biological resources and details how these resources may be protected.
Ten Year Investment Plan for Transport http://www.dft.gov.uk/about/strategy/whitepapers/previous/trans porttenyearplan2000	Tackle congestion and pollution by improving all types of transport and increasing choice, integrated at regional level. Public transport accessibility criteria for major developments; guidance and co-ordination where necessary on other matters such as car parking standards and road-user charging.
White Paper: The Future of Transport, a network for 2030 (July 2004) http://www.dft.gov.uk/about/strategy/whitepapers/previous/fot/	Coherent transport networks with:
	 the road network providing a more reliable and freer-flowing service for both personal travel and freight, with people able to make informed choices about how and when they travel;
	 the rail network providing a fast, reliable and efficient service, particularly for interurban journeys and commuting into large urban areas;
	 bus services that are reliable, flexible, convenient and tailored to local needs;
	 making walking and cycling a real alternative for local trips; and
	Ports and airports providing improved international and domestic links.

Rural Strategy 2004 http://www.defra.gov.uk/rural/policy/strategy.htm	Outlines three key priorities for rural policy: economic and social regeneration; social justice for all and enhancing the value of the countryside.
Environment Agency 'Policy and Practice for the Protection of Groundwater' www.environment-agency.gov.uk	 to provide a framework for the statutory role of protecting groundwater use our powers in a consistent and transparent manner; encourage co-operation between bodies with statutory responsibilities for the protection of groundwater including national and local government, water companies, Natural England and the Countryside Council for Wales; promote policies, so that land-users and potential developers may anticipate how the EA is likely to respond to a proposal or activity; influence the decisions of other organisations on issues of concern but beyond EA remit; Provide vital information and background on groundwater protection in England and Wales.
Waste Strategy for England and Wales (2007) http://www.defra.gov.uk/ENVIRONMENT/WASTE/strategy/index .htm	Emphasises the waste hierarchy (prevent, re-use, recycle/compost, energy recovery, disposal). Requirement to meet landfill directive targets. National target for recycling and composting 50% of household waste by 2020.
The Air Quality Strategy for England, Scotland and Wales (2007) http://www.defra.gov.uk/environment/quality/air/airquality/strategy/index.htm	Improve air quality. Targets include Sulphur dioxide 20ug/m³; Nitrous oxides 30ug/m³; Particles (PM10) 40ug/m³; and Nitrogen dioxide 40ug/m³
Human Rights Act (1998) http://www.opsi.gov.uk/ACTS/acts1998/ukpga 19980042 en 1	Public authorities have an obligation to act compatibly with Convention rights. Part 1, Article 8 conveys a right to respect for family life and home with no interference by a public authority except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others. Part 2, Article 1 conveys a right to the peaceful enjoyment of possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.
Children (Leaving Care) Act, 2000 http://www.opsi.gov.uk/acts/acts2000/20000035.htm	Ensure that young people do not leave care until they are ready and receive effective support and accommodation once they have left.
Water Act (2003) http://www.opsi.gov.uk/acts/acts2003/ukpga_20030037_en_1	Core Strategy to support the resolution of significant problem areas and seek to achieve sustainable water
	resources management.

	standards of environmental performance; and sustain th resource available for growing food and supplying other public benefits over time, except where alternative land uses are essential to meet other needs of society.
	Social Cohesion and Inclusion, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens.
Planning Policy Statement 1: Delivering Sustainable Development http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/	• Protection and Enhancement of the Environment protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole.
	 Prudent use of Natural Resources, outputs are maximised whilst resources used are minimised
	 Sustainable Economic Development, promote a strong stable, and productive economy that aims to bring jobs and prosperity for all
Planning and Climate Change - Supplement to Planning Policy Statement 1, 2007	Supplements PPS1 by setting out how planning should contribute to reducing emissions and stabilising climate change and take into account the unavoidable consequences
	Aim – deliver sustainable development which gives a fu and appropriate response to climate change. Secure the highest resource and energy efficiency and reduce emissions Promote sustainable transport and reduce the reliance of car use Encourage social inclusion and cohesion Conserve and enhance biodiversity Enable communities to tackle climate change Encourage businesses to harness technology to mitigate and adapt to climate change
	In planning for new development, the proposed provision for new development, its spatial distribution, location and design should be planned to limit carbon dioxide emissions. New development should also be planned to make good use of opportunities for decentralised and renewable or low carbon energy and minimise future vulnerability in a changing climate; and integrate climate change considerations should be integrated into all spatial planning concerns.
PPG 3 Housing	Managed delivery of the housing and previously developed land targets (national = 60%) within an overa strategy which identifies land for 15 years. Assess and demonstrate the extent to which plans fulfil the requirement for a five year rolling supply of deliverable land.
	Needs for housing to be informed by Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment. High quality housing for all, mi of tenure and price, in all areas, and in suitable locations A flexible, responsive supply of land with efficient and effective use of land. Locations to reduce car dependence

Everyone should have the opportunity of a decent home, which they can afford, within a sustainable mixed community. Consider: provision of intermediate market **Delivering Affordable Housing (November 2006)** housing, social rented housing, particularly family sized http://www.communities.gov.uk/publications/housing/deliveringa housing, developer contributions, grant funded products ffordablehousing (e.g. HomeBuy), housing aimed at first time buyers, ambitious but realistic affordable housing targets and thresholds given site viability. A good mix of tenures on new developments. See also PPS3, above. A sequential test, which requires shops to be developed on the most central sites first, retained alongside a new impact test. Schemes that could harm town centres will be assessed against factors including impact on the high street, consumer choice and consumer spending. Other objectives: ensure the economy is able to respond to rapid technological change and increased competition in the global economy, the challenges of global climate change and pressure on natural resources; ensure/promote a good range of sites, high quality sustainable development; sustainable travel choices; positively plan for the benefits that can accrue when certain types of businesses locate within proximity of PPS4: Planning for Sustainable Economic Growth (2010) each other; develop policies, in conjunction with the higher and further education sectors and other stakeholders; identify, protect and promote key distribution networks; avoid congestion and to preserve local amenity interests; promote mixed-use developments in appropriate locations; prioritise the use of previously developed land and encourage new uses for vacant or derelict buildings; take account of the changing spatial working patterns that advances in information and communication technologies allow; include a policy on tall buildings where this is justified by local circumstances; and car parking policies. I. On planning for town centres and retailing: • emphasis on a plan-led approach to promoting development in town centres, both through policies and the identification of locations and sites for development; • emphasis on the sequential approach to selecting sites for development, for retail, employment, leisure and other key town centre uses; and • Support for local centres. II. On town centres: • promotion of mixed-use development and retention of PPG 6 Town Centres and retail development key town centre uses; • emphasis on the importance of a coherent town centre parking strategy in • maintaining urban vitality, through a combination of location, management and · pricing of parking for different user groups; • promotion of town centre management to develop clear standards of service and

• improve quality for town centre users; and promotion of good urban design, including attractive and secure car

parks.

	III. On accomment of retail proposals:
	 III. On assessment of retail proposals: clarifying the three key tests for assessing retail developments: impact on vitality and viability of town centres; accessibility by a choice of means of transport; and impact on overall travel and car use;
	• how to assess out-of-centre developments; and, finally,
PPS9: Biodiversity and Geological Conservation	This PPS replaces PPG on Nature Conservation published in October 1994. It applies to urban and rural areas, international and national sites of special scientific interest (SSSIs) and areas that may not have specific statuary protection but are deemed important wildlife habitats. Key objectives include: Plans and policies should integrate biodiversity and geological diversity with other considerations. To conserve, restore and enhance the diversity of wildlife and geology. To accommodate biodiversity within new development, recognising the link between nature conservation and a sense of wellbeing in the community. This corresponds with biodiversities role in supporting economic diversification.
Planning for Biodiversity and Geological Conservation: A Guide to Good Practice	The document provides advice on the practical implementation of PPS9 policy.
The UK Biodiversity Action Plan http://www.ukbap.org.uk/	A detailed plan for the protection and enhancement of biodiversity resources. Seeks to increase public awareness of, and involvement in, conserving biodiversity; and to contribute to the conservation of biodiversity on a European and global scale. Core Strategy to support local BAPs and HAPs.
Working with the Grain of Nature: a Biodiversity Strategy for England (Defra, 2002) http://www.defra.gov.uk/wildlife-countryside/biodiversity/biostrat/index.htm	Sets out a series of actions to make biodiversity a fundamental consideration in agriculture, water, woodland, marine and coastal management & urban areas: Care for our natural heritage countryside attractive and enjoyable for all reversing the long-term decline in the number of farmland birds by 2020 Bringing into favourable condition by 2010 95% of all nationally important wildlife sites support meeting biodiversity targets in the Habitat and Species Action Plans Encourage business to act for biodiversity Involve people and help make biodiversity part of their everyday lives through information, communication and education.
Natural England Corporate Plan and Strategic Direction 2007 to 2010	Emphasises the interconnectivity of landscape and biodiversity. Retain the diversity and character of all landscapes and manage habitats to provide inspiration and a sense of place. Ensure that the natural values of existing designated areas are protected and enhanced whilst promoting multi-functional landscapes that deliver transport, agriculture, forestry, energy, water, recreation and housing.
National Public Service Agreement (PSA) targets for SSSI's http://www.hm-treasury.gov.uk/pbr_csr07 psaindex.htm	 Reversing the long term decline in the number of farmland birds by 2020 Bringing in favourable condition 95 per cent of all nationally important wildlife sites by 2010.

Planning Policy Statement 10: Planning and Waste Management	Promote sustainable waste management by providing facilities for the re-use, recovery and disposal of waste and to ensure that opportunities for incorporating re-use/recycling facilities in new developments are properly considered. Minimise adverse environmental impacts resulting from the handling, processing, transport and disposal of waste by moving waste management up the waste strategy and to move away from landfill. Promote joined up working between authorities.
PPS12 Local Spatial Planning 2008	Core Strategy vision to be in general conformity with the London Plan and closely relate to the Sustainable Community Strategy. May allocate strategic sites for development where these are central to achievement of the strategy. Supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. Evidence should cover who will provide and when. Draw on and influence any strategies and investment plans of the local authority and other organisations. Area Action Plans can be used to stimulate regeneration; protect areas particularly sensitive to change; resolve conflicting objectives in areas subject to development pressures; or focus the delivery of area based initiatives. A planning authority may prepare Supplementary Planning Documents to provide greater detail and assist the delivery of development. May be prepared by a government agency Regional Planning Body or a County Council or other body. Strongly encourages integrated community engagement on planning with other Council functions.
PPG Note 13: Transport	 Promote more sustainable transport choices by shaping the pattern of development and influencing the location, scale, density, design and mix of land uses. Reduce the need to travel and the length of journeys. Make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking and cycling.
PPG Note 15: Planning and the historic environment	Historic remains are to be valued and protected for their own sake, as a central part of our cultural heritage and sense of national identity. This includes listed buildings, conservation areas, designated historic parks and gardens.
Planning (Listed Building and Conservation Areas) Act http://www.opsi.gov.uk/ACTS/acts1990/Ukpga 19900009 en 1 .htm	Buildings which are listed or which lie within a conservation area are protected by law.
PPG Note 16: Archaeology and Planning	Archaeological remains should be considered a finite resource and planned for accordingly.
Ancient Monuments and Archaeological Areas Act 1979 http://www.culture.gov.uk/	Nationally important archaeological sites to be statutorily protected as Scheduled Ancient Monuments

The Historic Environment: a Force for Our Future (DCMS/DTLR, 2001)	 Provide leadership by responding to public interest in the historic environment. Realise the educational potential of the historic environment as a learning resource Include and involve people by making the historic environment accessible to everyone. Protect and sustain the historic environment for the benefit of our own and future generations Optimise the economic potential of the historic
Power of Place: The Future of the Historic Environment (The Historic Environment Review Steering Group, 2000) http://www.english-heritage.org.uk/server/show/nav.1303	environment by ensuring that its role as an economic asset is skilfully harnessed The future of England's historic environment, its role in people's lives and its contribution to the cultural and economic well being of the nation. With proper understanding and sensitive and open management, there can be desirable change without losing the places
Save Our Streets (English Heritage, Women's Institute, 2004) http://www.english-heritage.org.uk/server/show/nav.8680	we value. To restore dignity and character to our historic streets. Removing the blight of unnecessary signs, poles, bollards, barriers, hotchpotch paving schemes and obtrusive road markings.
English Heritage guidance on Farming and the Historic Landscape (2005) http://www.helm.org.uk/server/show/nav.19702	Advice with respect to archaeological sites, historic buildings, historic parkland, and entry level stewardship.
English Heritage guidance: 'Easy Access to Historic Buildings' (1999) http://www.helm.org.uk/server/show/nav.19702	Advice with respect to maximising the benefits from improving access to historic buildings.
PPG17: Open Space, Sport and Recreation	Plan for open space, sport and recreation based on an audit of current provision and of need.
Game Plan, The Strategy for delivering Governments' Sport and Physical Activity Objectives (2002) www.cabinetoffice.gov.uk/media//strategy/assets/game_plan_report.pdf	Support an increase in the number of physically active. Measures could include provision of footpaths, bridleways, cycle tracks, outdoor tourism and access to the countryside.
PPS22: Renewable energy	Statement of government policy concerning planning and development control of renewable energy developments. UK target to generate 10% of electricity from renewable sources by 2010, and 20% by 2020.
Building a Greener Future: Towards Zero Carbon	Proposes measures/programme to secure reductions in emissions from the domestic sector through promoting energy efficiency and the production of energy from a renewable source with the overall aim of achieving zero carbon homes by 2016. Proposed timetable:
Development, December 2006 (Consultation document) http://www.communities.gov.uk/archived/publications/planningandbuilding/buildinggreener	 By 2010 a 25% improvement in the energy/carbon performance set in building regulations will be required;
	By 2013 a 44% improvement;
	By 2016 all new housing will be zero carbon.
Code for Sustainable Homes: A step-change in sustainable home building practice http://www.communities.gov.uk/planningandbuilding/buildingreg ulations/legislation/codesustainable/	Sets minimum standards at each level of the code for energy/ CO_2 and water. Sets minimum standard at Code entry level for materials, surface water run-off and waste, biodiversity and healthy homes. A rating against the code is mandatory.

	This PPG gives advice on the relationship between controls over development under planning law and pollution control legislation. It is an update on previous guidance in that it incorporates consideration of new legislation (Pollution Prevention Control Act, 1999) and the Pollution Prevention and Control Regulations, 2000). The key concerns are:
PPS23: Planning and pollution control	 Reduce air and water pollution. Use Brownfield / contaminated land sites to maintain or enhance biodiversity.
	 Ensure pollution and planning control remains distinct but complementary and encourage joined up working.
	 Use the precautionary principle approach when there is a lack of certainty as to the effects of a decision or action.
Planning Gain Supplement Consultation 2006, Circular 05/05 and Community Infrastructure Levy http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyimplementation/planningobligations/	The Core Strategy can set the context and detail for use of Planning Obligations/Contributions. Obligations to be calculated at the time of the full planning permission, the amount would be payable upon commencement of development. A significant majority of PGS revenues will be recycled directly to the local level for local priorities, but a proportion would be used to deliver regional as well as local infrastructure. An SPD can indicate the likely infrastructure requirements of new developments and provide guidance on standard formula.
Community Infrastructure Levy Regulations 2010	Seeks to bring improved transparencies for communities who will know what infrastructure is needed and how it will be funded, and fairness and predictability for developers. From April, Section 106 agreements will only be permitted if they are directly related to the new developments and will be scaled back further by 2014. All but the very smallest developments will contribute towards coping with the extra pressure put on services. Other key provisions: • Up to 100 per cent CIL relief in exceptional circumstances for developments that would otherwise not proceed • Payments of CIL to be made in-kind in the form of land provided that land is transferred with the intention of providing infrastructure • doubling the standard payment period to 60 days to ease cash flow for developers and allowing payment by instalments in many cases • introducing the potential for local authorities to borrow against future CIL receipts to allow infrastructure provision to be unlocked earlier in development • providing additional relief for developing charities • providing 100 per cent exemption from CIL for most types of affordable housing; and • enabling authorities to draw the administrative costs of CIL from CIL receipts.
PPG 24: Planning and noise	Provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business.
PPS25: Development and Flood Risk	Strategy and policies to clarify how sequential approach and exceptions test to be applied. Applicants to prepare a Flood Risk Assessment on sites above 1 ha in flood zone 1(possibility of flooding is less than 1 in 1,000 chance a year) and on all sites, whatever size, in flood zones 2 and 3. Proposals to extend the Environment Agency's (EA) statutory consultee role regarding flood

	risk on developments. A greater importance placed on the use of Sustainable Drainage Systems.
PPS25 letter to Chief Planning Officers, May 2009 and Initial review of the implementation of Planning Policy Statement 25: Development and Flood Risk, June 2009	The letter emphasises the importance of Level 2 Strategic Flood Risk Assessment; good working relationships with the Environment Agency, sewerage companies and other stakeholders; requiring planning applications to be supported by flood risk assessment;
20. Development und Flood Risk, valle 2000	Annex 4 of the review considers the role of the Local Development Framework and emphasises the importance of Strategic Flood Risk Assessment and applying the PPS25 sequential test.
Safer Places, the Planning System and Crime Prevention (February 2004) www.communities.gov.uk/documents/planningandbuilding/pdf/1 47627.pdf	Guidance on how to create well-designed, sustainable places. Promotes good planning, and its particular role in tackling crime and the fear of crime. Seeks to prompt innovative, flexible thinking and effective working between the developer, designers, police and local planning authority.
Secured by Design www.securedbydesign.org.uk	Encourages design which seeks to ensure appropriate surveillance, landscaping, lighting, street furniture, footpaths, access and parking such that opportunities for crime are limited and provides advice with respect to how windows, doors and locks should be fitted to prevent crime.
Manual for Streets, March 2007 http://www.manualforstreets.org.uk/	Guidance to encourage good design which increases the quality of life. Covers layout, quality and materials, user needs, parking, signage, street furniture and lighting. Polices to support the aim of increasing the quality of life through good design which creates more people-orientated streets.
By Design, Urban Design in the Planning System – towards better practice http://www.cabe.org.uk/default.aspx?contentitemid=446	Guidance to encourage better design and to act as a companion to the PPGs/PPSs. Seeks to stimulate thinking about urban design and encourage the notion that careful assessments of places, well-drafted policies, well-designed proposals, robust decision-making and a collaborative approach are needed throughout the country if better places are to be created.
Accessibility Planning (September 2004) http://www.dft.gov.uk/pgr/regional/ltp/accessibility/	Improve accessibility for all with a focus on accessibility to employment, learning, health care, and food shops together with other services and opportunities of local importance.
Soil Strategy 2009 http://www.defra.gov.uk/environment/quality/land/soil/sap/index. htm	Seeks to promote better agricultural soils; managing climate change; avoiding harm during development; preventing pollution; and addressing contamination.

London (regional)

Plan/Programme	Objectives/requirements
	The Plan provides a framework that resolves the physical demands of integrating substantial growth within the structure of London to achieve both social and environmental benefit. The Mayor's vision is to develop London as an exemplary, sustainable world city, based on three interwoven themes: • strong, diverse long term economic growth • social inclusivity to give all Londoners the opportunity to share in London's future success • fundamental improvements in London's environment and
	use of resources
The London Plan 2008	The Plan sets out six key objectives to achieve the Mayor's Vision for London: • To accommodate London's growth within its boundaries without encroaching in open spaces. • To make London a better city for people to live in. • To make London a more prosperous city with strong and
	diverse economic growth. To promote social inclusion and tackle deprivation and discrimination. To improve London's accessibility. To make London a more attractive, well-designed and green
	city.
	The strategy has 10 key priorities which support the objective of the Mayor's Vision for London from the London Plan. Ten key transport strategies:
	Reduce traffic congestion Overcome the backlog of investment on the Underground to improve services
The Mayor's Transport Strategy 2008	 Radically improve the bus services Better integrate the rail system with London's other transport Increase capacity of the London transport network.
	6. Improve journey time reliability for car users 7. Support local transport initiatives 8. Making the distribution of goods and services in London
	more reliable. 9. Improve the accessibility of London's transport system 10. Bring forward new initiatives such as; integrated and simple public transport fares; and enhance safety and security and provide better information and waiting environments.
	The Mayor's Vision for Waste in London is that by 2020, municipal waste will no longer compromise London's future a a sustainable city. The strategy has 44 policies to meet the following objectives:
The Mayor's Waste Strategy	 Promote waste minimisation and reduce the growth of municipal waste to 2% by 2020. Increase proportion of waste that is recycled to 50% by 2010 Ensure all waste is handled in the most sustainable manner
	Other aims include: developing a Waste reduction and Re-us programme; encouraging schools to re-cycle on site to educate the next generation; encouraging Boroughs and businesses to sign up to a Green Procurement Code; and reducing street litter and fly tipping through the Capital Standards Programme

The Mayor's Energy Strategy	The strategy sets out the Mayor's long-term proposals for the way energy is supplied and used in London. The strategy aims to improve London's environment, reduce the capital's contribution to climate change, tackle fuel poverty and promote economic development. There are three key objectives:
	 To reduce London's contribution to climate change by minimising emissions of carbon dioxide from all sectors through energy efficiency, combined heat and power, renewable energy and hydrogen
	 To help to eradicate fuel poverty, by giving Londoners, particularly the most vulnerable groups, access to affordable warmth
	 To contribute to London's economy by increasing job opportunities and innovation in delivering sustainable energy and improving London's housing and other building stock.
	The plan includes a range of policies and proposals on how the Mayor will deliver the energy objectives through his strategic planning work.
	The strategy aims to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework. London does not have an accurate estimate of noise pollution and will set timescales and targets when this is achieved, however the strategy sets out key objectives:
	 Action on London's roads – improved noise reducing services, less congested stop-start driving with better traffic management, quieter tyres, technology /alternatives fuels, with 'Streets for People' redesign in housing areas.
	 Opportunities on London's railways – rail systems are to be efficient, well-maintained and operated, without producing needless noise.
The Mayor's Ambient Noise Strategy	 Seeking quieter skies – quieter engines and airframes, noise abatement operational procedures, operating restriction, and land use planning and building design in areas around airports will govern the impact of aircraft noise pollution. The Mayor supports the more rapid development of quieter aircraft and supports the view that night flights should be banned.
	 Issues on London's rivers and canals – noise on the 'Blue Ribbon Network' needs to be minimised.
	 Building a sustainable city – more sustainable building is promoted, including better sound insulation for new and existing homes. Boroughs are expected to indicate potential conflicts in their Development Plans.
	Thirteen initial priorities are set out in the strategy, and the following three are to be prioritised:
	 Securing good, noise reducing surfaces on TfL roads Secure a night aircraft ban across London Reducing noise through better planning and design of houses
The Mayor's Air Quality Strategy	The Mayor's Air Quality Strategy aims to minimise the adverse effects of air pollution on the health of those who live and work in London. The strategy aims to work towards the national air quality objectives and includes measures to: • Modernise buses

	 Educating bus drivers Clean up London taxis Awareness raising campaigns Promote clean technology and alternative fuels award Mayoral Environmental Business Marque for good environmental practice
The South London Waste Local Plan (covering the Boroughs of Kingston, Sutton and Croydon)	Currently in draft, the Plan considers potential sites as well as setting out strategic and development control policies. A sustainability appraisal report has been produced to inform the preparation of the Waste local Plan and this will feed into the appraisal of the Core Strategy. A key recommendation of that report is the need to enhance the effectiveness of the Plan in addressing climate change.
The London Cultural Strategy and the Mayor's Direction of Travel document on Culture – <i>Cultural Metropolis</i>	Four key objectives focused on excellence, creativity, access and value. Underpinning each of these objectives is the principle of diversity. The Merton LDF should, accordingly, recognise that the excellence and quality of culture in London can be achieved by ensuring that diverse communities are reflected, and active, in the cultural life. The supplementary document 'Cultural Metropolis' emphasises the importance of championing the role of culture in the built environment.

Merton Borough

Plan/Programme	Objectives/requirements
	Sets out key activities with the aim of reducing casualties.
Road Traffic Casualty Plan 2004-05 and Road Safety	1) Education, Training and Publicity
Travel Plan	2) Engineering and
	3) Speed Enforcement
	The Councils Vision - 'Merton a great place to live, work
	and learn'.
	There are six strategic objectives: Education Merton: The achievement of standards of
	excellence in our schools and colleges, and inclusive
	access to learning, the arts and sport.
	Safe, clean and green Merton: A safe and clean
	environment in our streets and open spaces to improve sustainability and provide a high quality of life for our
	residents.
	Caring Merton: Support for vulnerable children that
Best Value Performance Plan	provides positive life chances and support for vulnerable
	adults that meets their needs while maximising their
	independence. Thriving Merton: Regeneration of town centres and
	neighbourhoods to provide an attractive environment in
	which to live visit and work.
	Equalities Merton: Full and equal access to learning,
	employment, services and cultural life and the celebration of diversity.
	Effective Merton: Strong corporate governance to deliver
	and sustain improvements, and provide community
	leadership
	Overall Aim: To enhance the material welfare of the residents of the
	Borough by improving their long term access to good
	quality local employment opportunities, by helping to
	create a healthy environment for business, by facilitating
	social inclusion and enterprise and by helping to enhance the productivity and value of activities in the informal
	economy
	Subsidiary Aims:
	 To promote and support a culture of enterprise and
	innovation.
	To facilitate employment growth in those sectors in which Merton currently has a comparative advantage.
	3. To facilitate an increase in the number of jobs in the
	Borough which are attractive to local residents
	4. To facilitate improvements in the quality of jobs in the
	Borough by increasing the representation of high value- adding businesses within Merton.
	5. To promote a diverse range of business sectors in
Economic Development Strategy	Merton in order to "insure" against large, sudden macro-
	economic changes and ensure a lasting and stable level of
	economic activity. 6. To contribute strategically to the long term economic
	sustainability and success of London
	7. To promote equality of access to jobs and economic
	opportunity for all sections of the local community.
	8 To reduce the geographical inequalities between the east and the west of the borough which are reflected in the
	indices of deprivation
	9 To improve the abilities and skills of Merton residents in
	order to enhance their chances of securing good quality
	employment (particularly those residents whose chances
	of securing any employment are low).
	10. To reduce the negative impact of Merton's economy on the environment in accordance with the principles of
	sustainable development.
	11. To increase local and independent ownership and
	control of businesses and to promote their integration into the social fabric of the local community.

	 To ensure that all communities in Merton have convenient access to a full range of competitive retail services. To help improve the productivity and cost-efficiency of
Environmental Action Plan	those households without work in the formal economy. The plan is an update to the Local Agenda 21 plan developed in 1996, its aim is to: Encourage and facilitate the involvement of residents, businesses and other organisations in helping to create an environmentally sustainable Merton, in accordance with the wider principles of sustainable development. There are sixteen targets for the environmental action plan.
	 The Plan has three main aims. To develop and enforce comprehensive procedures and actions to deal with the contaminated land.
Contaminated Land Strategy	To encourage appropriate redevelopment of land.
	 To minimise activities which might result in future land contamination
Air Quality Action Plan Progress Report 2008	
Housing Strategy 2008/09 Homelessness Strategy	
	Safe and Green
	Safe and Green • More Police on the streets to reduce the fear of crime.
	More Police on the streets to reduce the fear of crime.
	 More Police on the streets to reduce the fear of crime. Improve public transport services.
	 More Police on the streets to reduce the fear of crime. Improve public transport services. Reduce graffiti. Protect Merton's parks and open space from built
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Compunity Plan	 More Police on the streets to reduce the fear of crime. Improve public transport services. Reduce graffiti. Protect Merton's parks and open space from built development. Keep Merton's streets clean by regular sweeping.
Community Plan	 More Police on the streets to reduce the fear of crime. Improve public transport services. Reduce graffiti. Protect Merton's parks and open space from built development. Keep Merton's streets clean by regular sweeping. Lifelong Learning Invest in young people by developing their skills and
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Community Plan	 More Police on the streets to reduce the fear of crime. Improve public transport services. Reduce graffiti. Protect Merton's parks and open space from built development. Keep Merton's streets clean by regular sweeping. Lifelong Learning Invest in young people by developing their skills and talents. Encourage all sections of the community to participate in lifelong learning. Provide low cost training/learning. Increase the choice of learning/training. Provide more nursery/pre-school services. Supporting Local Business

- Encourage new companies to come to Merton.
- Improve the skills of local people to take opportunities for better jobs.

A Caring Community

- Tackle alcohol related crime in town centres.
- Protect vulnerable people, especially older people.
- Tackle poverty/social deprivation/most deprived neighbourhoods.
- Restore a sense of civic pride in Merton.
- Promote the development of local communities/sense of neighbourhood.
- High quality, safe health and social care services
- Efficient services that make the best use of NHS resources

Better Healthcare Closer to Home Nov 2004 – Merton, Sutton and East Surrey Primary Care Trust consultation document

- Improved environment in which to receive treatment
- Increased choice for patients
- Local services for patients
- Reduced waiting times

APPENDIX B

ENVIRONMENTAL, SOCIAL AND ECONOMIC BASELINE

Sustainability objectives	Indicators and targets	Commentary
1. Climate Change	National Indicator 188: Planning to adapt to climate change seeks to embed the management of climate change by assessing risks and opportunities; taking action in any identified priority areas; develop an adaptation strategy and action plan and implement, assess and monitor the actions on an ongoing basis. Evidence will be required that the local authority has put in place a mechanism for proactively managing climate risks and opportunities in their decisions, plans and measures on the ground. For climate change gas emissions – see SA Objective 2 and SA Objective 9. For water resources see SA Objective 7.	Climate change is a threat to the lifestyles of Merton residents and to wildlife, cultural heritage and material assets. The Climate Change Strategy sets out how the Merton council together with the community can take action to adjust lifestyle and business choices to secure a better future for all. The nine key themes to the strategy are energy; planning and development; waste; transport; water; biodiversity and the natural environment; environmental education and awareness raising; procurement and fair trade; and city knowledge. Every action specified in the document has a delivery time scale associated with it. Road traffic and heating buildings are the biggest contributors to climate change gas emissions. More sustainable patterns and forms of transport and making the heating of buildings more energy efficient is, therefore, a key objective. In the document 'Our Energy Challenge, Securing clean affordable energy for the long term Jan 2006', the DTI identifies combined heat and power (CHP) as having potential as a method of capturing the currently wasted energy in electricity generation. Climate change predictions suggest that lower rainfall may be experienced in the south east. In addition to drinking water shortages, falling groundwater levels could lead to increased risk of subsidence and, where heavy rain falls on a parched ground in late summer the risk of flooding could increase. Green roofs, rain water harvesting, water storage and sustainable drainage are measures that will be necessary to complement an overall strategic approach of avoiding area of high flood risk. Rising temperatures will also affect energy demand in buildings as people seek to cool buildings during summer months for both employment and residential use. It is important, therefore, that buildings are designed not just with heat retention measures in mind but also those that aide natural ventilation and provide shading. Biodiversity is another area that could potentially be affected by changes in the climate of the borough althou

2. Energy and Carbon Reduction

Renewable energy capacity

National Indicator NI 186: per capita reduction in CO_2 emissions in the LA area (www.decc.gov.uk); emissions of CO_2 to be reduced by 60% of 1990 levels by 2025 (London Plan) and 80% by 2050 (Climate Change Act 2008)

The Home Energy Conservation Act 1995 requires an improvement in energy efficiency, as measured in the annual HECA report, of 30% 2006 - 2011.

The London Plan seeks an exemplary approach to energy. Merton has been in the forefront for developing strategy for carbon reduction through the 'Merton Rule' and is eager to build on this progress. Energy and carbon reduction is a key issue in the Climate Change Strategy (See SA Objective 1).

Renewable energy capacity: London 110MWe (www.restats.org.uk, 2008)

It is estimated that in 2006 the carbon footprint in Merton is 11.60tonnes CO_2 per capita (www.resource-accounting.org.uk) The sector with the highest contribution to this footprint is housing, and more specifically the electricity, gas and other fuels used in the home. This carbon footprint is higher than the London average of 11.38tonnes CO_2 per capita and lower than the UK average of $12.12 CO_2$ per capita.

Energy efficiency measured using the SAP method calculated a score for Merton of 52 which compared with 53 for London and a national average of 51. This would suggest that even though the borough has a comparably old housing stock its energy efficiency is reasonable. However against the Decent Homes standard 30% of the homes in the borough failed with 69% of these failing on thermal comfort, which mirrors the national picture. The study estimates that the costs for dealing with this are prohibitive. Currently there is a difference in affordability, level of provision, quality, environmental performance, design and distribution of housing within the Borough.

HECA 2006/07 indicates that Merton had nearly achieved the target of 30% 4 years early, with a reduction of 25.1%, the sixth best performance in London.

3. Biodiversity	95% of SSSIs to be in favourable or recovering	Wimbledon Common is the only Site of Special Scientific Interest (SSSI) in Merton. This site lies
,	status.	1.5km to the north west of Wimbledon town centre and extends into Wandsworth. There are three
		units for this site in Merton. In the latest assessments, carried out by Natural England in 2006 and
	Increase coverage of Sites of Importance to	2009, all three units were classified as unfavourable recovering condition. In previous assessments (in 2003) one unit was classified as favourable condition, so there has been a slight decline in
	Nature Conservation (www.gigl.org.uk)	condition over the last few years. Wimbledon Common is also designated as a Special Area of
		Conservation, primarily to protect the Stag Beetle Lucanus cervus although it is also an important
		example of two habitats: Northern Atlantic wet health with Erica Tetralix and European dry heaths;
		Richmond Park Special Area of Conservation, west of Wimbledon is also designated to protect the Stag Beetle. Air pollution and recreation can have an adverse impact on the habitats and/or stage
		beetle.
		London Boroughs also have three types of Sites of Importance for Nature Conservation (SINC): Sites
		of Metropolitan Importance, Sites of Borough Importance and Sites of Local Importance. The Sites of
		Metropolitan Importance are designated by the Mayor of London, and the GLA - they are the most
		important wildlife sites in London. There are 4 of these sites in Merton. They are Wimbledon Common and Putney Heath, Upper River
		Wandle, Morden Cemetery and Mitcham Common. Sites of Borough Importance are habitats
		designated as important wildlife sites by the borough's themselves. The lowest grading wildlife sites
		are the Sites of Local Importance - these are smaller sites such as parks and gardens that help the
		community have access to wildlife near their homes. In Merton, there are 34 Sites of Borough

www.wildweb.london.gov.uk/wildweb/About.do

Importance and 19 Sites of Local Importance

Merton council has a good provision of public open space and the boroughs gardens provide a further significant amount of the urban green space. The London Plan seeks improved quality of the public realm and to see the creation a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.

4. Access to Nature and Open Space	There should be no areas deficient in access to open space (Merton Open Space Study).	Open space makes a significant contribution to quality of life: it increases the opportunities for outdoor recreation both actively and passively giving both physical and psychological health benefits for the population; it improves understanding and appreciation of the environment in the borough as well as protecting it; and is a cultural resource which different communities can use to express their diversity as well as socialise or participate in community events. Good quality open space can add economic value both to property nearby and employers through the leisure/tourism industries; and plays an important role in attracting commercial investment.
		The Merton Open Space Study 2005 indicates that Merton enjoys an excellent provision of open space, including common land and along the river Wandle but there is scope for increasing the opportunity for contact with nature and open space and improving the quality of the public realm. The London Plan seeks improved quality of the public realm and to see the creation a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.
		Public open space in Merton covers 677 ha of land which equates to 4 ha per 1000 of population (Merton Open Space Study 2005). This comfortably meets the National Playing Fields Association standard of 2.43 ha per 1000. However this figure hides the fact that the distribution of open space varies across the borough as illustrated by Map 1. In addition to these publicly accessible open spaces there are a variety of other types of open green space in the borough such as cemeteries, allotments, school playing fields, private sports grounds and unique sites of wildlife value. There are 3 parks or green spaces in the borough of Merton that have been awarded the Green Flag (www.communties.gov.uk). This recognises high environmental quality and management, and access to all members of the community. These are John Innes Park and Sir Joseph Hood Memorial Playing Field. New in 2009 is Collier's Wood Recreation Ground.

5. Natural Resources	Number of contaminated sites	The London Plan seeks an exemplary approach to waste, energy and water use, management and provision. This recognises that there is a finite level of resources to be distributed over an increasing
	See SA Objectives 2, 6, 7, 9 and 10.	population and, at the local level, an increasing number of households.
		The borough is underlain by a thick layer of London Clay beneath which is a chalk and lower tertiary sand aquifer between 40 and 100m below the surface. This provides a natural protective barrier preventing contamination permeating to the chalk from which water is extracted by local water companies (Contaminated Land Strategy 2001). In addition to physical development water resources can be affected by depositions of sulphur, nitrogen, heavy metals from cars, buses and air travel can wash through, absorbed and take decades to dissipate. The potential effects of soil pollution may not become apparent for many years.
		There are no sites that would be termed contaminated under the statutory definition (Part IIA of the Environmental Protection Act 1990). The council is also required to continuously inspect the area for any further sites that come to light. This is relevant as the area has historically been linked with industry due to the river Wandle being a source of transport and power. The recent decline of manufacturing has led to some of this land being redeveloped for residential use. Between 2000 and 2008, 64 sites have been investigated as a result of planning applications or voluntary submissions; 9 sites required no further remedial action, 41 had unrecorded remedial status and 9 sites were remediated (covering 10.9 hectares). The Environment Agency reports that all the land pollution incidents recorded in Merton between 2004 and 2008 had minimal environmental damage. The number of category 3 incidents, which cause minor damage, fell from eight in 2004 to zero in 2007 before rising to five in 2008. The majority of incidents were caused by unauthorised activity, such as fly-tipping, vandalism and unauthorised waste management activity.
		This sustainability objective is also covered by sustainability objectives (2, 6, 7, 9 and 10).

6. Waste

Reduce waste, increase recycling:

National Indicator 191: Residual household waste per household. The targets for this indicator, in Merton, are 733 kg/hh by 2008/09, 712 kg/hh by 2009/10 and 716 kg/hh by 2010/11

National Indicator 192: Household waste reused, recycled and composted

National Indicator 193: Municipal waste land filled

The Environment Agency Reports that municipal waste arisings in Merton in 2007/08 were 92,241tonnes. This has decreased by 3,902 tonnes from the 96,143 tonnes produced in 2005/06.

The volume of waste going to landfill fell by 6%, between 2005/06 and 2007/08, from 81% to 75%. The volume of municipal waste that is recycled in Merton has increased from 18% to 25% over the same period.

Merton is currently not achieving its 2009/10 target, of 38,930tonnes, under the Landfill Directive. Under the Landfill Allowance Trading Scheme (LATS), each waste disposal authority is given an allocation for the amount of biodegradable municipal waste (BMW) that they can landfill each year. This is to reduce the amount of waste land-filled in order to meet the requirements of the Landfill Directive. The amount of biodegradable municipal waste going to landfill in Merton has declined from 53,785 tonnes in 2005/06 to 46,918 tonnes in 2007/08. This is within the allocation provided. Merton needs to reduce the amount of BMW sent to landfill by 7,988 tonnes to meet the 2009/10 target.

The residual household waste per household (NI191) in 2007/08, in Merton, was 736 kg per household (kg/hh).

The household recycling and composting rate in Merton has increased steadily since 2000/01. Merton ranks 15th for the recycling and composting rate, out of all 33 boroughs. The recycling only rate is 23.33% ranking 10_{th}, and the composting only rate is 3.75% ranking 23rd. The current rate of 27.08% is higher than the total London rate of 25.5% (2007/08).

7. Water Quality and Resources

Improve the biological and chemical status of the River Wandle and Beverly Brook to good by 2027 (Environment Agency)

water consumption (www.defra.gov.uk Sustainable Development Indicator 16 Population growth and lifestyle choices are increasing the amount of water used and affecting the quality of the river Wandle, Beverly Brook and their tributaries See SA Objective 5 for a commentary on contamination). Predicted climate change is for drier summers and more severe weather events, both of which could further affect water resources.

Under the Water Framework Directive the River Wandle and the Beverley Brook have both been classified as having poor ecological status (draft plan October 2009). Biological quality is assessed using the biological General Quality Assessment (GQA) which uses macro-invertebrate populations to give a long-term indication of water quality. There are a number of watercourses in Merton. designated under the biological GQA scheme. The Beverley Brook, from the Pyl Brook to the Tideway, has been assessed as having fair biological quality, achieving grade D in the GQA scheme from 1995 to 2008. The River Wandle, from Beddington effluent ditch to the tideway, has shown recent improvements in biological quality. In 2007 and 2008 the quality met the standards for grade C (fairly good), an improvement from the historic grade D (fair). The current level of biological quality represents a river where some species that are sensitive to pollution are absent, and there is a rise in the number of species that tolerate it. The following were previously designated but are no longer part of the biological GQA network. The quality of these was calculated when they were designated. The Beverley Brook, from Worcester Park sewage treatment works to Pyl Brook, showed historic poor quality (grade E) from 1990 to 2006. This represents a river restricted to species that tolerate pollution. The Pyl brook, improved in biological quality from poor (grade E) in 1995 to fair quality (grade D) from 2000 to 2006 (Environment Agency).

Drinking water is supplied by Thames Water Utilities Ltd (London Water Resource Zone) and Sutton and East Surrey Water (Sutton WRZ). The 5-year average (2004/05-2008/09) water use in the London supply zone is 158.4 litres per person per day (*Thames Water draft water resources* management plan), which is higher than the England and Wales average of 148 litres per person per day. Average water use in London is 160.9 litres per person per day. The 5-year average (2004/05-2008/09) water use in the Sutton and East Surrey supply zone is 159.8 litres per person per day. The London Zone has a deficit at peak demand, which in the short term will be met by a desalination plant in the Thames Estuary, and in the long term by a new reservoir in the Upper Thames catchment. Sutton & East Surrey supply zone enters a deficit in 2016. The south east is an area of serious water stress and water efficiency measures will be essential to support new growth in the borough. There are 7 licensed abstractions in the borough, mostly for public water supply but also for spray industrial uses such as laundry. The borough falls into the London Catchment Abstraction Management Scheme (CAMS) area and is situated in two catchments: the Wandle catchment to the east and the Beverley Brook catchment to the west. The upper reaches of the Wandle catchment were assessed as having 'no water available' in the London CAMS. The Beverley Brook has water available for further abstraction. The main water resource in London is the confined Chalk aquifer, which underlies most of London. This has been assessed as being over-licensed, but is managed so that groundwater doesn't flood any of London's deep infrastructures.

8. Flooding	Compliance with PPS25	The Environment Agency reports that the
	National Indicator 189: the percentage of agreed actions to implement long-term flood and coastal erosion risk management plans that are being undertaken satisfactorily. This refers specifically to the Thames Catchment Flood Management Plan (CFMP) which	Flood zone 2 represents the 1 in 1000 y in 100 year probability of flooding. The a around the Pyl Brook and Beverley Brook River Wandle. Other areas include the I properties (12% of all properties) are at are residential. Approximately 44% of the likelihood of flooding, whilst 34% have a
	focuses on flooding from rivers and the Thames Estuary 2100 (TE2100) Plan which is	Map 3 illustrates the extent of flood risk
	concerned with flooding from the sea.	Flooding has not occurred in the boroug along the banks of the Pyl Brook and th West Barnes. Prior to this flooding occu Beverley Brook.

the borough of Merton has land within flood zones 2 and 3. year probability of flooding, and flood zone 3 represents the 1 area of land within flood zones 2 and 3 covers a large area rook, in the south west of the borough, and the land around the land around the Friggs Marsh Ditch. An estimated 11,000 at risk of fluvial (river) flooding. The majority of these properties these properties at risk are classified as having a significant a low likelihood. The remainder have a moderate likelihood.

k areas in the borough.

ugh of Merton since 1968 when extensive flooding occurred the Beverley Brook, in the south west of the borough around curred in 1937. This flood event affected small areas along the

1,610 people registered (mid 2009) to Flood Warnings Direct (FWD). This is about 15% of the properties at risk of flooding. The Environment Agency offers the FWD flood warning service, which gives advance warning of flooding via phone, text, email, pager or fax.

The Thames Catchment Flood Management Plan (CFMP) focuses on flooding from rivers and the Thames Estuary 2100 (TE2100) Plan is concerned with flooding from the sea. Both of these plans make recommendations for how flood risk will be managed in the future (NI189).

9. Air Quality	Meet the United Kingdom National Air Quality Strategy Standards: Benzene 5 mg/m3 Annual Mean 31 Dec 2010; 1, 3 Butadiene 2.25 mg/m3 (1 ppb) Running Annual Mean 31 Dec 2003; Carbon Monoxide 10 mg/m3 Daily Maximum Running 8 hour mean 31 Dec 2003; Lead 0.25 mg/m3 Annual Mean 31 Dec 2008; Nitrogen Dioxide 200 mg/m3 (105 ppb) not to be exceeded more than 18 times a year (1 hour mean) 40 mg/m3 (21 ppb) Annual Mean 31 Dec 2005 31 Dec 2005; Particles (PM10) 50 mg/m3 not to be exceeded more than 35 times a year (24 hour mean) 31 Dec 2010, 23ug/m3 Annual Mean 31 Dec 2010, 20ug/m3 24 hour mean Annual mean 31 Dec 2015; Sulphur Dioxide 125 mg/m3 (47 ppb) not to be exceeded more than3 times a year (24 hour mean) 31 Dec 2004, 266 mg/m3 (100 ppb) not to be exceeded more than 35 times a year (15 minute mean) 31 Dec 2005.	Air quality is improving but there is further scope to reduce atmospheric pollution across the Borough by supporting public transport, cycling and walking and more sustainable design in homes and commercial buildings. The biggest contributor to air pollution in the borough is road transport. Of the pollutants produced by road traffic oxides of nitrogen and particulates have been identified as exceeding national target levels in the borough. These two groups of pollutants are the focus of objectives in both Merton's Air Quality Strategy and the National Air Quality Indicators. For nitrogen oxides the borough does not have any continuous monitoring sites but nearby sites that are part of the Local Air Quality Network are considered to represent the situation in the borough. For Particulates there are two permanent monitoring sites in the borough. Through Air Quality Assessment in 2006 and 2008 the Council has not identified any risk with respect to the air quality objectives for carbon monoxide, benzene, 1,3-butadiene, lead and sulphur dioxide being exceeded. A risk exists, however, that the air quality objectives for NO2 will be exceeded at locations with relevant public exposure. An AQMA has been designated across the borough in this respect. The council has also identified a risk that the air quality objectives for PM10 (for 2010 only) will be exceeded at locations with relevant public exposure. The council are not required to undertake a Detailed Assessment for PM10 at this stage. The findings for PM10 however will be noted for longer term planning.
10. Land Use	60% of development on previously developed land	The number of vacant properties had fallen steadily following a peak between 1993 – 1995.

11. Health and Well-being	Increase population within 0.5 miles (0.8km) of	At Census 2001 73% of the population described their health as good. Merton ranks
	a health centre. See Map 5.	London boroughs for those describing their health as not good. Merton's Healthier C Strategy 2008 to 2012 reports that life expectancy in both males and females is sign
	Life expectancy at birth	than England as a whole, and rates for deaths from smoking and early deaths from significantly lower. There are health inequalities within the east of the borough by g
	50% reduction in people killed or seriously	and ethnicity. For example Ravensbury Ward appears relatively deprived, and men
	injured (KSIs)	income group have lower life expectancy than those in the highest income group. Or years, the rate of deaths from all causes has fallen for both men and women, and is
	60% reduction in child KSIs by the year 2010	England. The rate of early deaths from heart disease, stroke and cancer has also fa Merton appear to lead relatively healthy lives, with rates for smoking, binge drinking
		significantly lower than England
		Map 5 shows the distribution of local health care services in the borough. The Sutto
		Primary Care Trust proposes a 'model of care' to encourage an increase in the amo provided locally, for example, in GPs surgeries, clinics and in the home. To supplem
		care hospitals are to be provided in the borough based on redevelopment of existing
		many of the outpatient services provided at a larger hospital will be provided instead
		A reduction in accidents is reported in the AMR with 16% decrease 2007 to 2008. T

ks 30 out of 33 of Communities gnificantly higher n cancer is gender, income n in the lowest Over the past ten is below the rate for fallen. Adults in g and obesity

ton and Merton nount of care ment this two local ng facilities where ad.

The borough has reduced the rate of children killed and seriously injured by 81% and is one of the five best performing boroughs (TfL LBM 2007/08 LIP Reporting & Funding Feedback).

Noise pollution is most often related to transport either through planes, trains or cars. Road traffic is the most widely complained about source according to GLA surveys. Light pollution is another issue caused by the increasing amount of artificial light in our cities. As well as disturbance caused to humans it can impact on wildlife like disrupting bird's behaviour for instance. DEFRA noise maps indicate that of Merton's 37.6 km² the area affected by Lden levels of greater than 60 dBA is 4.7 km². This equates to 13% of the total area.

12. Poverty and Social Inclusion

Address issues raised by Index of Multiple Deprivation data (www.defra.gov.uk)

Increase population within 0.5 miles (0.8km) of community/leisure facilities. See Map 5.

Reduce fuel poverty (NI 187) (www.decc.gov.uk)

Income Support Claimants (www.statistics.gov.uk)

The 2007 Indices of Multiple Deprivation identify Merton as 222 out of 354 UK local authorities and, therefore, amongst the least deprived overall. Only 5 London Boroughs perform better. There are clear disparities, however, in income and access to social infrastructure between the Eastern and Western part of the borough. The most deprived wards include Cricket Green, St. Helier, and Lavender, and are predominantly in the east of the borough. It should be noted, however, that at the Output Area level of detail the picture is somewhat different with pockets of deprivation located in the more affluent Raynes Park locality.

It is in the Mitcham area where the level of deprivation is relatively low. The centre lies within the Figges Marsh ward although borders both Cricket Green and Lavender Fields. Figges Marsh exceeds the average income support claim rate for London with a rate of 8.9% whereas the London average is 7.94% (Census 2001). Average income is low and unemployment high in all three wards. Figges Marsh and Cricket Green are amongst the top 20% deprived wards in the country.

The Department for Energy and Climate Change estimates that in 2006 5,213 households suffer from fuel poverty in Merton (7%). Whilst this is relatively low for London and the UK, it is a significant issue. 461 households have benefited from energy saving installations in Merton through Warm Front in 2007/08 and a further 167 households since April 2008.

The number of people claiming Job Seekers Allowance stood at 2230 in 2008, a reduction on the 2006 peak. The effects of the economic downturn are not yet known, however. The Community Plan reports, however, that the borough's claimant unemployment has risen by 26% in the five months to November 2008

13. Diversity and equity	Comply with the Statement of Community	The Merton Community Plan 2009-2019 reports that like many London boroughs, Merton has
	Involvement	experienced high rates of migration and population change in recent years. Between 1992 and 2005
	o	Merton had the largest increase in population of any outer London borough, with the population
		growing by 13.93%. This growth is predicted to continue, with the population reaching 220,300 by
		2025. In particular, the numbers of children and young people and over 85s are predicted to rise. 25%
		of the population is from Black and Minority Ethnic groups, and this rises to over 50% in Merton
		schools. This makes Merton the 23rd most diverse local authority nationally. There are significant
		populations of mixed heritage, Black African, Black Caribbean and Asian origins. Recent rises have
		also been seen in the white ethnic groups represented by the South Africa and Polish populations.
		Language data shows Tamil and Urdu speaking populations doubling with more than a 1,000
		speakers in each group; the Polish speaking population has increased five fold, to over 400 speakers;
		Somali and Filipino populations, although small in number, have also doubled. 63.3% of Merton
		residents are Christian, 5.8% are Muslim, 4.65% are Hindu and 16.55% are not religious. Merton has
		high levels of community cohesion, with 85% of local residents feeling that their local area is one
		where people from different backgrounds get on well together. There are high numbers of 'young
		professionals' and this is reflected by the high proportion of single person households living in the
		borough when compared to the rest of the country, although when compared to the rest of London it
		is fairly average.
		There are a variety of ways for the local community and individuals to get involved in the decision
		making involved in the boroughs development. These ranges from the various committees and
		council meetings that make the decisions though to a wide variety of forums and user groups that
		help inform these decisions before they are made. There are also a number of annual resident's
		surveys as well as one off consultations on projects and proposals. A more detailed review of these
44 Dasia Nasada	Access to proceed to recipe and access tiel	forms of community engagement is included in Merton's Statement of Community Involvement.
14. Basic Needs	Access to resources, housing and essential services.	The Community Plan recognises the importance in ensuring access to basic needs, in particular
	services.	delivering affordable access to housing, food, water, and fuel.
	See Appended Maps, SA Objective 15 and SA	Wimbledon is the primary centre in the borough with a further three town centres, five local centres
	Objective 19	and 34 neighbourhood parades. It is estimated that there are 40 corner shops outside the
	, ,	neighbourhood parades and local centres. Not all residents live, however, within 800m (five minutes
		average walking distance) of a local shop that will sell the basic food products such as bread, milk
		eggs and tinned vegetables. In addition to food products, basic services include doctor's surgeries,
		school/colleges, post offices banks and public houses. Maps 4-6 illustrate the location of some of
		these services and areas of deficiency.

15. Transport	Improve accessibility by all modes	Merton is a well connected borough due to its location between inner and outer London. There are
		two designated strategic roads running through the borough: the A3 Kingston by-pass and the A24
	Improve public transport accessibility (MBC)	London Road which both give access to the M25 and south circular. Gatwick is 16 miles to the south
		and Heathrow 9 miles to the west. Major train lines run through Wimbledon and Mitcham Junction
	33% reduction in the number of trips by road	connecting the borough directly with London Waterloo and Thameslink services which link to north London. Underground services terminate at both Wimbledon for the District Line and Morden for the
		Northern line. These give journey times to central London of 20 minutes. The London Plan specifically
		promotes improvements in the national rail network; improved orbital movement by public transport,
		including Croydon Tramlink extensions; and improve access to Heathrow support the strategic co-
		ordination of the development corridor from Croydon to Gatwick.
		Appended maps illustrate that accessibility to key services, facilities, employment, goods and other
		amenities is generally good but uneven across Merton. The Annual Monitoring Report 2008 indicates
		that Public Transport Accessibility Levels are not evenly spread across the borough and less affluent
		areas, including parts of Mitcham and Pollards Hill currently have lower levels than Merton's more
		affluent western areas. The opening of Mitcham Eastfields has improved accessibility in that area.

The rest of the borough is well served by a wide variety of bus services including night buses.

Census 2001 indicates that 35% of Merton's residents travel to work by car, which is almost on a par with the average for London but the lowest proportion in London south. There are 45 km of London Network Cycle routes in the borough forming part of the London wide network. They are a mixture of on and off road utilising Merton's network of parks where possible. The council also runs a Safer Routes to Schools campaign which is encouraging travel to schools by sustainable modes such as

walking. 61 schools in the borough had adopted a Green Travel Plan by 2008.

The AMR indicates that the modal split fluctuates from year to year, but that bus use has increased steadily between 2006 and 2008. Trips by road have also fluctuated and have generally increased between 2000 and 2008. A key initiative is the Sustainable Action Travel Plan (SATP) for walking and cycling, which seeks to encourage the use of sustainable modes of transport in the short and medium term.

16. Culture, Leisure and Social	Increase population within 0.5 miles (0.8km) of	Wimbledon is the primary centre in the borough with a further three town centres, five local centres.
Activities	cultural and community/leisure facilities	These centres have good access by rail and bus and provide a variety of museums, libraries, cinemas, theatres (4), and open space, parks and sports facilities. In addition, London can be accessed by bus and/or rail.
	See SA Objective 4 and SA Objective 17.	
	,	There are a number of museums in the borough focusing on its history including the councils own
		Merton Heritage centre in Mitcham. Other museums include the Wandle Industrial Museum, the
		Merton Abbey Wheel House, and the Wimbledon Society Museum of local history, the Wimbledon
		Windmill museum and the Wimbledon Lawn Tennis museum. However, there are no museums of a

sufficient size or standard to be registered under the Museum Registration scheme. There are seven public libraries in the borough and Morden library includes a local studies centre providing more historic information on the borough.

Opportunities for culture, leisure and recreation need to be readily available to all in Merton, building on existing facilities in the Borough and capitalising on Merton's role at the Olympics.

17. Historic Environment	Reduce heritage buildings at risk (English Heritage) No loss of Listed Building, Historic Park and Garden or Scheduled Ancient Monument Number of Conservation Area Appraisals	Competing land uses and climate change put pressure on the heritage of Merton. Strategy and policy can be informed by a better understanding and interpretation about archaeology and historic open space, and about whether retrofitting or replacement is appropriate to achieve heritage objectives and reduced emissions over the anticipated life cycle. The area of Merton has been inhabited in some way or other since the Stone Age it therefore has a rich heritage. Before the 19 th Century Merton was rural with large estates and various milling industries along the River Wandle and the small villages of Mitcham and Wimbledon. Residential development followed the arrival of the railway in Wimbledon in 1838. However the 1926 arrival of the deep line tube in Morden had the greatest effect on the borough with massive areas of development in the surrounding hinterland, particularly the St Helier estate to the south. It's for this reason that inter-war years semi-detached housing makes up the greatest land use in the borough. A number of estates were built in the 1960s including Pollards Hill and Ravensbury Park and also a number of parks were developed including the recent Wandle Meadow Nature Park. Wimbledon is the dominant centre in the borough both for shopping and transport displacing Mitcham and Morden which has led to its decline. Much of the heritage that has been conserved in the borough is architecturally based, being protected by Conservation Areas and local listing. This is focused mainly in the historically more affluent west of the borough and is typically based on Victorian housing. The heritage value of some of the open spaces in the borough is also recognised through various designations. • 28 Conservation Areas designated covering a total area of just under 6 square kilometres (16%
	1	

of the borough)

• 1,042 locally listed

wall at Merton Priory

• three Grade 1 and 226 Grade II and II* statutorily listed buildings.

Of these English Heritage reports that 7 are at risk (2009): 70 Christchurch Road, memorials at St Peter and Paul's Churchyard, Ravensbury Mill, Mill House, Merton Priory, Morden Park Mound and a

• 20 designated Archaeological Priority Zones

• three scheduled ancient monuments

• four historic parks and gardens

18. Crime and fear of crime	Maintain low rates of crime and reduce fear of	Merton Crime and Drugs Audit are carried out every 3 years and identify Merton as a low crime
	crime	borough in comparison to other areas of London. The following concerns have been raised: actual
		bodily harm offences have risen, particularly in Wimbledon town centre by 25% in one year; offensive
	Merton Borough Council Annual Resident's	weapon offences have also increased dramatically in the past two years which could potentially lead
	Survey	to them becoming an area of concern in future; harassment offences, domestic incidents and racial
		incidents were all high and more commonly found in the east of the borough. Certain types of
		acquisitive crime have raised in particular shoplifting, burglary of non-dwellings, motor vehicle
		interference and tampering, pedal cycle theft and theft on public transport.

19. Housing	Meet housing need	The Merton Housing Strategy 2008-2011 sets out how Merton will seek to meet housing needs. 'Place-shaping' is one of two key objectives of the strategy, as a better mix of housing is needed,
	370 dwellings per year	particularly intermediate and social rented homes, in order to provide more choice for those who cannot afford market housing. The second is 'Empowering people', which focuses on supporting
	30% affordable housing	vulnerable people and preventing homelessness.
		The London Mayor's Draft Housing Strategy 2009, aims to increase the supply of new homes to not the demand and needs for housing in London, with greater emphasis on the provision of affordable family homes and low cost home ownership. To this end the annual target for new homes in Merton the is a minimum of 320 homes per year. Merton must also contribute to an overall affordable house target for London of 50% of all housing (60% social rented and 40% intermediate homes). Merton on target to provide 315 new affordable homes between 2008 and 2011 through its housing association partners; 30% of these will be available for households on low and middle income to purchase on a shared equity basis. Merton has been provided with a Homelessness Grant of £120,000 a year for three years, for prevention initiatives such as: rent deposits to help homeless households rent homes in the private sector, a sanctuary scheme to assist people at risk of domes violence, and a mortgage rescue scheme. In addition, a £100,000 grant was awarded to Merton to reduce overcrowding and £36,000 for Merton and Sutton councils jointly to run a homelessness mediation scheme.
		The Ethnic Minority Housing Strategy sets out to improve the responsiveness and sensitivity of housing provision for BAME (Black and Asian Ethnic Minorities) communities in Merton, and aims further strengthen partnership working and understanding of needs.

There is still a shortage of affordable housing. This is exacerbated by the continuing growth of new households, many of whom cannot afford local housing costs. First-time buyers and people on low or middle income are still experiencing difficulties getting on the housing ladder because of house price increases since the early 1990s. Although prices are now falling, mortgages are difficult to secure due to the 'credit crunch'. The number of homelessness acceptances in Merton is among the lowest in London, and the long-term trend in homelessness acceptances in Merton reflects the downward national trends. The quality of temporary accommodation, and the support provided to homeless households, will need to be improved to help ensure a better quality of life.

To help vulnerable households and those on low incomes who are fuel poor, energy advice and assistance will continue to be provided, targeting areas with the highest levels of fuel poverty. Energy efficiency initiatives will also help reduce CO2 emissions across all tenures, and help contribute towards tackling climate change (see SA Objective 2)

20. Education and Skills	Increase educational attainment and improve	The Merton LEA Statistical Report post 16 Leavers Report May 2005 indicates that the number of
	skills match to employment:	pupils going on to some form of further education was 80% in 2004 which shows a rise of 1% over the
	, ,	previous year. Typically 30% stay in the borough whilst 63% go outside.
	Number of pupils getting grades A-C at GCSEs	
	(www.dcsf.gov.uk)	The number attaining A-C grades at GCSE has risen steadily from 45% in 2003/2004 to 69%, above
	,	the national average.
	People achieving NVQ Level 4 and above	
	(www.nomisweb.co.uk)	The specialised employers identified in SA Objective 21, below, reflect a high level of qualification at
	,	1,10,0,41, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1

The specialised employers identified in SA Objective 21, below, reflect a high level of qualification at NVQ 4 level or above in the borough (38%, www.nomisweb.co.uk) which is well above the Great Britain average (29%), although lower than the peak of 42% in 2000. The higher skill level is also reflected in the occupation structure in the area with an over representation of professional, managerial and senior roles compared to Great Britain. Conversely this means that there is a lower representation of people employed in the lower skilled industries such as plant and machine operatives. The National Employers skills survey indicates that in London South employers consider the main occupations with skills gaps are: sales and customer services, administration and clerical, managerial, public sector, health and social care; hotels and restaurants. More specific to Merton, employers recognise IT skills as the most common shortcoming of their current staff (Learning and Skills Assessment for Merton 2003).

21. Work and the economy	Provide employment land and support access	At June 2009 (www.nomisweb.co.uk) there are 107,400 residents in employment and 7,000
	to employment	unemployed. Total employment has risen since 2000, although dropping from the high of June This also masks the fact that the percentage of employed economically active persons has act
	Number and proportion of economically active employed and number and proportion of people unemployed (www.nomisweb.co.uk)	dropped. The number of unemployed persons has fluctuated over the last five years and curre stands at 4,000 (6.2%). This compares favourably to both London and the UK.
		Census 2001 indicates that almost 50% in employment in the borough also work in the boroug largest proportions of in-commuters come from the neighbouring boroughs. The largest number out-commuters works in central London in Westminster, the City of London and Wandsworth.
		Unemployment is generally higher in the east of the borough with Colliers Wood, Cricket Gree Figge's Marsh, Lavender Fields, Longthornton, and Pollards Hill Wards all demonstrating high levels. The Local Labour Force and Labour Market Survey highlight that there are large BAME communities in these areas.
		The London Plan seeks strengthening of the economic linkages to central London and has ide Opportunity Areas and Areas for Intensification (Policies 5E.2 and 5E.3) to provide a focus. Th London Plan also seeks stronger Metropolitan town centres and to encourage sensitive restrutoreflect changes in the office market and the need for a range of economic activities and hou
		The Economic Land Study (October 2005) looked at the supply and demand for commercial la the borough. It concluded that the forecast employment change over the period to 2016 is characterised by growth in the business services and distribution and decline in manufacturing

high of June 2008. sons has actually rs and currently

the borough. The rgest number of andsworth.

and has identified a focus. The sitive restructuring ies and housing.

ommercial land in 2016 is characterised by growth in the business services and distribution and decline in manufacturing. The study concluded that there is an adequate supply of employment land in the short term to satisfy demand. In long term it is estimated that supply will exceed demand and that this should be monitored in relation to de-allocating employment land. Concerns were raised over the quality of the existing office space.

Non consumer services, non-market services and advanced business are the largest employers. Other specialisms were identified as construction, basic business services, paper manufacturing and utilities. The manufacturing and distribution sectors are generally under-represented in the borough in comparison to UK averages which is a reflection of the skills levels in the borough (see SA Objective 20, above). Some of the key sectors in Merton which were reported to be experiencing growth are environmental technologies, construction, and knowledge and producer services. The creative industries and plastics and rubber sectors are also relatively specialised although have been experiencing declining employment in recent years. It is too early to be able to assess the consequences of the recent economic downturn.

APPENDIX C

CONSULTATION

Consultation

Several formal stages of consultation have been undertaken and these are summarised below. Consultees included:

- Government Office for London
- The Mayor of London and The Greater London Authority (GLA)
- London Development Agency
- Transport for London
- The Environment Agency
- The Countryside Agency (Natural England)
- English Nature (Natural England)
- English Heritage
- The Merton Chamber of Commerce
- Neighboring London Boroughs (Wandsworth, Sutton, Lambeth and Croydon
- House Builders Federation
- Merton Unity Network
- Home Community Agency (HCA)
- Sutton and Merton PCT
- Metropolitan Police Service
- Highways Agency
- Thames Water
- National Grid
- The Commission for Architecture and the Built Environment (CABE)

The Scoping Report and various Sustainability Appraisal Reports have also been made available on the Council's web site.

Sustainability Appraisal Scoping Report 2006

As prescribed by Task A5 of government guidance (CLG SA Guidance and PAS web site), a Scoping Report was produced at the start of the process of preparing the Core Strategy DPD and circulated for comment. The aim was to identify/verify the scope of the appraisal and the key issues and possible options to deliver the objectives of the plan.

A key component of the appraisal process was consultation with stakeholders. The consultation was in accordance with:

- Article 6 of the European Union Directive 2001/42/EC (SEA Directive).
- Regulation 4 and Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).
- The Statement of Community Involvement and other Council prescribed consultation processes.

Sustainability Appraisal Scoping Report Refresh 2008

Due to the time elapsed between the initial Scoping Report and the 'preferred options' consultation; and in view of additional evidence that had become available, a Scoping Report Refresh was published for consultation in 2008.

Sustainability Appraisal Reports

Sustainability Appraisal Reports have been published to inform consultation at each stage of the preparation of the Core Strategy DPD:

- Spatial Options, November 2006
- Preferred Options, July 2007
- draft Core Strategy, October 2009

The public and other consultees advised the council that the focus of the Core Strategy should be on:

- Enhancing, protecting and improve public access to the boroughs historic environment and open spaces
- Tackling imbalances in Merton through regeneration in keys areas
- Tackling the effects of climate change: flooding, local energy supplies and effective waste management;
- Improving people's environment and health,
- Providing a mix of new homes across the borough.

APPENDIX E HABITATS REGULATIONS ASSESSMENT

APPENDIX F COMPLIANCE WITH THE SEA DIRECTIVE

SEA Directive

Article 1: Objectives

The objective of the Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.

Where addressed in the SAR

Section 4 provides a detailed account of how environmental consideration have been identified, considered and integrated into the Core Strategy DPD. Significant effects are identified and it has been demonstrated that the DPD provides for a high level of protection of the environment.

Article 2: **Definitions**

For the purposes of this Directive:

- (a) 'plans and programmes' shall mean plans and programmes, including those co-financed by the European Community, as well as any modifications to them:
- which are subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and
- which are required by legislative, regulatory or administrative provisions;
- (b) 'environmental assessment' shall mean the preparation of an environmental report, the carrying out of

consultations,
the taking into account of the environmental report and

the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision in accordance with Articles 4 to 9;

- (c) 'environmental report' shall mean the part of the plan or programme documentation containing the information required in Article 5 and Annex I;
- (d) 'The public' shall mean one or more natural or legal persons and, in accordance with national legislation or practice, their associations, organisations or groups.

The Core Strategy DPD falls within the definition of a 'plan and programme'.

The SAR includes an Environmental Report and provides an account of consultations, including the public (summarised in Appendix C). Section 4 provides an account of the findings of appraisal and how this has influenced the preparation of the DPD.

Also see Articles 4 to 9 and Annex 1, below.

SEA Directive

Article 3: Scope

- 1. An environmental assessment, in accordance with Articles 4 to 9 shall be carried out for plans and programmes referred to in paragraphs 2 to 4 which are likely to have significant environmental effects.
- 2. Subject to paragraph 3, an environmental assessment shall be carried out for all plans and programmes,
- (a) which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent of projects listed in Annexes I and II to Directive 85/337/EEC, or
- (b) Which, in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of Directive 92/43/EEC.

Article 4: General obligations

- 1. The environmental assessment referred to in Article 3 shall be carried out during the preparation of a plan or programme and before its adoption or submission to the legislative procedure.
- 2. The requirements of this Directive shall either be integrated into existing procedures in Member States for the adoption of plans and programmes or incorporated in procedures established to comply with this Directive.
- 3. Where plans and programmes form part of a hierarchy, Member States shall, with a view to avoiding duplication of the assessment, take into account the fact that the assessment will be carried out, in accordance with this Directive, at different levels of the hierarchy. For the purpose of, inter alia, avoiding duplication of assessment, Member States shall apply Article 5(2) and (3).

Where addressed in the SAR

The Core Strategy DPD falls within the scope of plans an programmes defined by paragraph 2.

The provisions of paragraphs 3 to 9 are not relevant.

Also see Articles 4 to 9 and Annex 1, below.

Section 2 of the SAR describes the process of sustainability appraisal and sets out how this has been undertaken throughout the DPD preparation. Table 2, Section 2 summarises the stages of appraisal and identifies how this is fully compatible with the requirements of the SEA Directive. This table provides further confirmation of this.

Paragraph 1.1.1, 1.1.2, 2.2.12, Table 3, paragraph 4.1.2, 4.2.1 and 4.2.2 clarify the relationship between the DPD and the higher level London Plan and how the appraisal of that plan has informed the appraisal of the Core Strategy DPD. Appraisal commentary in Section 4 includes relevant information from the London Plan appraisal.

SEA Directive

Article 5: Environmental report

- 1. Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.
- 2. The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.
- 3. Relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision-making or through other Community legislation may be used for providing the information referred to in Annex I.
- 4. The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.

Article 6: Consultations

- 1. The draft plan or programme and the environmental report prepared in accordance with Article 5 shall be made available to the authorities referred to in paragraph 3 of this Article and the public.
- 2. The authorities referred to in paragraph 3 and the public referred to in paragraph 4 shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme or its submission to the legislative procedure.
- 3. Member States shall designate the authorities to be consulted which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes.
- 4. Member States shall identify the public for the purposes of paragraph 2, including the public affected or likely to be affected by, or having an interest in, the decision-making subject to this Directive, including relevant non-governmental organisations, such as those promoting environmental protection and other organisations concerned.
- 5. The detailed arrangements for the information and consultation of the authorities and the public shall be determined by the Member States.

Where addressed in the SAR

The Sustainability Appraisal Report incorporates an Environmental Report.

Alternatives have been considered within the context of the London Plan, which sets a higher level strategic framework for spatial planning in Merton. This is discussed in Section 4 of the SAR.

The subjects included in the SAR are listed under the heading 'Annex 1' of this table.

Appendix B sets out relevant information on the basis of the list and the wider scope of sustainability (which requires more information with respect to social and economic interests).

Section 2.2 and Appendix C demonstrate how the relevant authorities have been consulted.

A full copy of this SAR has been sent to English Heritage, Natural England and the Environment Agency.

The consultation process described in Appendix C and this consultation meet the requirements of paragraph 2, within the definition of consultees and process prescribed by the UK Government (paragraphs 3, 4 and 5).

SEA Directive	Where addressed in the SAR
Article 7: Transboundary consultations	
This article refers to impacts across international borders. Article 8: Decision making The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure. Article 9: Information on the decision	There are no transboundary implications of the Core Strategy DPD. Section 4 of the SAR and Appendix C describe the process, including how appraisal and consultation comments have been taken into account in preparing the Core Strategy DPD.
1. Member States shall ensure that, when a plan or programme is adopted, the authorities referred to in Article 6(3), the public and any Member State consulted under Article 7 are informed and the following items are made available to those so informed: (a) the plan or programme as adopted; (b) a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and (c) the measures decided concerning monitoring in accordance with Article 10. 2. The detailed arrangements concerning the information referred to in paragraph 1 shall be determined by the Member States.	Further to the comments made with respect to Article 8, above, an adoption statement will include reference to the sustainability appraisal process and how this incorporates an environmental assessment.
Article 10: Monitoring 1. Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action. 2. In order to comply with paragraph 1, existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring.	Section 5 of the SAR and Appendix B provide an account of how monitoring will be undertaken.

SEA Directive	Where addressed in the SAR
Article 11: Relationship with other Community	
legislation	
1. An environmental assessment carried out under this	The SAR follows the guidance set out
Directive shall be without prejudice to any requirements	by the Planning Advisory Service. This
under Directive 85/337/EEC and to any other Community law requirements.	incorporates CLG guidance on SEA.
2. For plans and programmes for which the obligation	Where projects are deemed to be
to carry out assessments of the effects on the	environmental impact assessment
environment arises simultaneously from this Directive	development, the subsequent planning
and other Community legislation, Member States may	application will be accompanied by an
provide for coordinated or joint procedures fulfilling the	Environmental Statement in
requirements of the relevant Community legislation in	accordance with the provisions of
order, inter alia, to avoid duplication of assessment.	Directive 85/337/EEC.
3. For plans and programmes co-financed by the European Community, the environmental assessment	
in accordance with this Directive shall be carried out in	
conformity with the specific provisions in relevant	
Community legislation.	
Article 12: Information, reporting and review	
Member States and the Commission shall exchange	It will be the role of the Inspector at the
information on the experience gained in applying this	Independent Examination to make a
Directive.	judgment under Article 12(2).
2. Member States shall ensure that environmental reports are of a sufficient quality to meet the	
requirements of this Directive and shall communicate to	
the Commission any measures they take concerning	
the quality of these reports.	
Paragraphs 3 and 4 are not relevant.	
Article 13: Implementation of the Directive	
The Direction has been been been been been been been bee	None
The Directive has been implemented in full.	No response necessary.

SEA Directive Where addressed in the SAR Annex 1 The information to be provided under Article 5(1), subject to Article 5(2) and (3), is the following: (a) see Section 1.2 and Section 4.1 of (a) an outline of the contents, main objectives of the the SAR plan or programme and relationship with other relevant plans and programmes; (b) the relevant aspects of the current state of the (b) see Table 2 and Table 3, Section 2; environment and the likely evolution thereof without Section 4; and Appendix B of the implementation of the plan or programme; SAR (c) the environmental characteristics of areas likely to be significantly affected: (c) as above (d) any existing environmental problems which are relevant to the plan or programme including, in (d) as above, more specifically Table 3 particular, those relating to any areas of a particular and Appendix B environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC; (e) the environmental protection objectives, established at international, Community or Member State level, (e) see Appendix A which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation: (f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, The scope of subjects for the SAR is human health, fauna, flora, soil, water, air, climatic set by the SA Framework (See factors, material assets, cultural heritage including Table 2, Section 2). This covers all architectural and archaeological heritage, landscape these subjects. and the interrelationship between the above factors; (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects (g) Section 4 of the SAR describes how on the environment of implementing the plan or the Core Strategy DPD seeks to address significant adverse effects. programme: (h) an outline of the reasons for selecting the (h) Section 4 of the SAR includes a alternatives dealt with, and a description of how the assessment was undertaken including any difficulties commentary with respect to (such as technical deficiencies or lack of know-how) alternatives taken forward and encountered in compiling the required information; alternatives not taken forward. Frequent reference is made throughout the SAR with respect to difficulties (i) a description of the measures envisaged concerning (i) Section 5, Table 2 and Appendix B monitoring in accordance with Article 10; (i) a non-technical summary of the information provided A Non Technical Summary of the

SAR has been published

under the above headings.