# Pre Submission Sustainability Appraisal Report

(Incorporating Environmental Report)

# London Borough of Merton Site & Polices and Polices Map (formally known as Proposal Map) *Part of Merton's local plan*

**Non Technical Report** 

July 2013

# 1 Non Technical Summary

#### Introduction

1.1 This document forms the Scoping Report for a Sustainability Appraisal (SA), which incorporates the requirements for a Strategic Environmental Assessment (SEA), of the London Borough of Merton Sites and Polices Plan and Polices Map. These Plans are part of Merton local plan. The Scoping Report is a consultation document for the three statutory consultees with environmental responsibilities in England (Environment Agency, Natural England and English Heritage) along with other relevant stakeholders with a sustainability remit or a local interest.

# 2 Purpose of Sustainability Appraisal/SEA

- 2.1 The purpose of Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating social, economic and environmental considerations into the preparation of new or revised Local Plan. By identifying the key sustainability issues likely to be affected by the implementation of a plan, developing options and assessing any significant effects from the earliest stages of plan preparation. SA's are an important tool for developing sound planning policies which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.
- 2.2 The SA will:
  - Ensure compliance with the SEA Directive, SEA Regulations and guidance on SEA/SA;
  - Review the Local Plan's relationship with other sectorial plan's, and plans operating at a national, regional and more local level with regard to their policies and programmes;
  - Establish the baseline environmental, social and economic characteristics of the area;
  - Identify any current environmental constraints, issues and problems;
  - o Help develop viable options and alternatives; and,
  - Review the sustainability impacts of the options.
- 2.3 The EU Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK by the SEA Regulations 2004, requires environmental assessment to be undertaken on all

plans and programmes where they are likely to have significant environmental impacts.

- 2.4 The purpose of the Directive is to provide a high level of environmental protection and to contribute to the integration of environmental considerations into the preparation of plans and programmes with promoting sustainable development.
- 2.5 The regulations apply to a wide range of plans and programmes from local to regional level, including local development documents.

### 3 Methodology

- 3.1 This document forms a Sustainability Appraisal Report (SAR) incorporating the requirements of a strategic environmental assessment (SEA Directive<sup>1</sup>). 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 Manual <sup>2</sup> and the CLG SEA Practical Guide (2005).
- 3.2 CLG guidance identifies five stages to undertaking sustainability appraisal:
  - Establishing the scope of appraisal
  - · Assessing effects and considering alternatives;
  - Preparation of a Sustainability Appraisal Report;
  - · Consultation; and,
  - Monitoring the effects of implementing the Plan.
- 3.3 The methodology is as follows:
  - **Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope.
  - Stage B: Developing and refining options.
  - Stage C: Appraising the effects of the plan.
  - Stage D: Consulting on the plan and the SEA/SA report.
  - Stage E: Monitoring Implementation of the Plan.
- 3.4 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.
- 3.5 For the purposes of this Scoping Report, Stage A of the methodology has been undertaken, which is further divided into six key tasks.

<sup>&</sup>lt;sup>1</sup> European Directive EC/2001/42 and the subsequent SEA Regulations 2004

<sup>&</sup>lt;sup>2</sup> See Planning Advisory Service <u>www.pas.gov.uk</u>

STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope		
Stage A1	Identify other relevant plans, programmes and sustainability objectives that will influence the Local Plan.	
Stage A2	Collect and develop relevant social, environmental and economic baseline information and define the character of the area.	
Stage A3	Identify key sustainability issues for the SA / Plan to address.	
Stage A4	Develop the SA framework, consisting of the SA objectives, indicators and targets.	
Stage A5	Testing the plan objectives against the SA framework.	
Stage A6	Consult on the scope of the SA.	

# 4 Scope of the SA/SEA

4.1 Baseline data and the development of the SEA/SA framework has been organised in accordance with the topics required by the SEA Directive and as outlined in the CLG Plan Making Manual. The scope of the baseline review has been refined to cover a broader spectrum of sustainability issues which are a reflection of the combined SEA/SA assessment.

### 5 Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

#### Review of other plans (Task A1)

- 5.1 A review of all policies, plans and programmes with a bearing on the Sites & Polices Plan and Polices Map 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 guidelines that will influence the Sites & Policies Plan and Polices Map.
- 5.2 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 Sites & Polices Plan and Policies Map.

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

- 5.3 By establishing a baseline of environmental, social and economic information (Appendix B) key sustainability issues can be identified for consideration in the appraisal. This task draws on information in the planning policy evidence base, the Authority Monitoring Reports (formally 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 future monitoring.
- 5.4 Much of this information cannot be summarised as quantifiable data that can be entered in baseline Appendix B. The baseline combines both commentary and data outputs whist still allowing for professional judgement.

#### Data Limitations

- 5.5 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.
- 5.6 The data, therefore, acts as an indicator and has been selected to monitor progress towards the achievement of particular objectives and to provide a tangible measure concerning broader issues. This measure is often only a small component of meeting the objective so may simplify the issues and interactions.
- 5.7 Appraisal, therefore, relies on a mixture of quantified data and professional judgement. Accordingly, the baseline includes a commentary concerning the trend indicated by the current and historical data.
- **5.8** 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)

- 5.9 Key issues were initially presented in the Scoping Report 2006 and this informed the preparation a set of 20 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 this planning document.
- 5.10 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 2 below.

#### Developing the SA Framework (Task A4, Table 2)

5.11 The identification of sustainability issues also provides useful information for the sustainability appraisal process itself. It will inform Stage B of the process where options and polices will be tested against the appraisal objectives.

- **5.12** The identification of sustainability issues meets the requirements of the SEA Directive to identify any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance. Merton's Sustainability Appraisal follows an objectives led process. All potential impacts of a plan are tested against a series of objectives for sustainable development.
- 5.13 The framework that is used to appraise the Sites & Policies Plan and Polices Map 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 20 sustainability objectives set out in Table 2 represent a revision of the objectives, but have incorporated all the original subjects.
- 5.14 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.

Sustainability	Key issues	Indicators, targets
objectives		objectives
Environment	objectives	
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	<ul> <li>Implement, assess and monitor the actions on an on-</li> </ul>
2. Energy and carbon reduction	strategy for carbon reduction and is eager to build on this progress by focussing on carbon reduction from new developments and also from other energy saving initiatives via Merton's Climate Change Strategy. Furthermore, design measures introduced to address climate change will also help improve energy efficiency and energy from waste schemes can also help	Use sustainable energy

	Mantan kasa makuna shika sh	
	Merton has a rich wealth of	Further protect and enhance
	habitats and species that are	all existing designated sites.
	protected from development	
	and climate change and	Reduce the area of the
	enhanced where possible.	borough deficient in access
3.	The London Plan seeks	to areas of natural green
Biodiversity	improved quality of the public	space
	realm and to see the creation	
	a new regional park that	
	integrates and contributes to	
	the regeneration of the Wandle	
	Valley Development Corridor.	
	Merton enjoys an excellent	Improve the access to and
	provision of open space	quality of open spaces.
	especially existing commons	
	(Wimbledon and Mitcham)	
	and along the river Wandle	Conserve and protect
	but there is scope for	existing trees against
	increasing the opportunity for	<b>U</b>
4. Access to	contact with nature and open	
nature and	space and improving the	
	quality of the public realm.	
open space		
	The creation of the Wandle	
	Valley Regional Park within	
	London's Green Grid will help	
	improve access to nature and	
	open space as well as create	
	recreation opportunities.	

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	The Department for Environment Food and Rural Affairs (DEFRA) has produced a strategic noise map for major airports, roads and railways in London and the council will have regard to this information. The council	To Improve amenity by minimising the impact associated with noise.
5. Noise	will also have regard to the Noise Action Plan for London and the Mayor of London's Ambient Noise Strategy. Theses mapping identifies areas in Merton where noise levels need to be managed. The priorities in Merton are the following along the A3 Kingston-by-pass, Plough Lane/Haydons Road junction, Cricket Green and South Wimbledon junction.	
6. Waste	There is a need to identify new facilities to accommodate a move away from land filling waste. The South London Waste Plan aims to divert 100% of waste from landfill will make a major contribution to this.	line with reducing net carbon emissions and the European waste hierarchy and to recover the maximum value from

7. River and water quality use, resources and wastewater infrastructure		Reduce water pollution and improve water quality and resources in river Wandle and Beverly Brook. Improvement of the biological and chemical status of the River Wandle and Beverly Brook to good by 2027 (Environment Agency).
8. Flooding	the river Wandle, Beverly brook and their tributaries.	0
9. Air quality	Air quality is improving in Merton but there is further scope to reduce atmospheric pollution across the borough buildings.	Ensure the risks of pollution to human health and all areas of the boroughs environment are reduced.
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 transport and community facilities accessibility.	Increase the use of urban brownfield land.
11. Access to culture, leisure and social activities	leisure and recreation need to be readily available to all in Merton, building on existing	Improve the access to and quality of open spaces. Improve access to cultural and leisure facilities.

	Merton has a number of statutory and locally listed buildings within the borough.	Reduce heritage buildings at risk on English Heritage at Risk Register.
	It is important that any development is sensitive to Merton's historical assets.	No loss of Listed Building (local and statutory) and Historic Parks and gardens.
and heritage environment	Improving, understanding and value of historical assets in Merton.	Protect and enhance the boroughs archaeological heritage (including remains) and historical assets (including walls and graveyards).
13. Transport	across Merton; with some areas east of the borough having poor transport links to their local centre and essential amenities. Sustainable transport in Merton has improved over the years.	<ul> <li>Meet Merton's target of reducing transport CO2 emissions by 45% by:</li> <li>Reduce the need to travel by car.</li> <li>Increase the use of sustainable transport modes including walking and cycling.</li> </ul>
	It is essential that this is built upon in Merton.	
Social obje	ctives	
14. Health and well being	There are large disparities in health and well-being across the borough namely in the east of the borough which has a higher.	Improve health equality and access to health and well- being facilities. Encourage regular participation in sport and recreation.
15. Poverty and social inclusion	There are clear disparities in income, access to social and community and infrastructure between the eastern and western part of the borough.	Ensure everyone has access to basic services. Alleviate the risk of fuel poverty.

16. Diversity and equality	Merton has a wide cultural, ethnic, faith based and racial diversity.	Promote equality where a vibrant socially inclusive community is encouraged.
17. Crime and fear of crime	Building on Merton's historical low crime figures. Creating safer and secure communities for all in the borough.	crime and reduce fear of
18. Housing	Currently in Merton there is a difference in affordability, level of provision, quality, environmental performance, design and distribution of housing within the borough.	Housing Target Meet housing need (320 units per year)
19. Affordable housing	The London Plan and Merton local plan seek to deliver housing provision, social and other infrastructure and that the reuse of surplus industrial land is managed. The provision of affordable is a priority.	<ul> <li>Affordable Housing         <ul> <li>▶ 10 units and above: 40% on site</li> <li>▶ between 1-9 units: 20% cash in lieu to create additional affordable homes</li> </ul> </li> </ul>
Economic o	objectives	
20. Education and skills	There is a disparity of skills and employment in the borough. Namely higher level of non- educational achievement or attainment and training in the east of the borough.	Increase opportunities to education and training. The percentage of pupils in local authority schools achieving 5 or more A*-C grades (or equivalent) including English and maths in Merton and regeneration areas. Improve the potential to enable more employment options and training in the borough.

21. Work and the economy	between the east and west of the borough, with east having	Provide employment land and support access to employment. Number and proportion of economically active employed and number and proportion of people unemployed ( <u>www.nomisweb.co.uk</u> .
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# London Borough of Merton Site & Polices and Polices Map Part of Merton's local plan

Pre Submission Sustainability Appraisal Report (Incorporating Environmental Report)

## 6 Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA)

#### Introduction

This Sustainability Appraisal report is for the 'Pre-Submission Stage' of the Sites and Polices; and Polices Map document part of Merton's local plan.

# 7 Purpose of Sustainability Appraisal

- 7.1 The purpose of sustainability appraisal (SA) is to promote sustainable development by integrating social, economic and environmental considerations into the preparation of new or revised Local Plan documents. By identifying the key sustainability issues likely to be affected by the implementation of a plan, developing options and assessing any significant effects from the earliest stages of plan preparation. Therefore, SA's are an important tool for developing sound planning policies which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.
- 7.2 The EU Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK by the SEA Regulations 2004, requires environmental assessment to be undertaken on all plans and programmes where they are likely to have significant environmental impacts. The purpose of the Directive is to provide for a high level of environmental protection and to contribute to the integration of environmental considerations into the preparation of plans and programmes to promoting sustainable development.
- **7.3** The regulations apply to a wide range of plans and programmes from local to regional level, including local development documents.

### 7.4 Sustainability appraisals should be:

- **Inclusive:** ensuring early and on-going involvement of the public, statutory authorities and other stakeholders at the appropriate stages of plan preparation.
- **Objectives led**: so that the direction of desired change is made explicit with measurable targets.
- Evidence based: including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed.

- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.
- 7.5 At the conclusion of plan preparation, the final SA report should show how the final plan has addressed the sustainability agenda and the choices made between alternative policies and proposals. This will be considered by the Inspector when determining the soundness of the plan at the Public Examination stage.
- 7.6 This SA Report sets out the outcome of the SA/SEA process of the additional polices and potential sites allocations in the Site and Polices Development Plan: preferred options document and further changes to the Proposal Map.
- 7.7 This document forms a Sustainability Appraisal Report (SAR) incorporating the requirements of a strategic environmental assessment (SEA Directive<sup>3</sup>). 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 Manual <sup>4</sup> and the CLG SEA Practical Guide (2005).

CLG guidance identifies five stages to undertaking sustainability appraisal:

- Establishing the scope of appraisal;
- · Assessing effects and considering alternatives;
- · Preparation of a Sustainability Appraisal Report;
- Consultation; and,
- Monitoring the effects of implementing the Plan.
- 7.8 Through, the application of the process, the council has identified the scope for sustainability appraisal, key sustainability issues, and the likely impacts on implementation of the plan.

<sup>&</sup>lt;sup>3</sup> European Directive EC/2001/42 and the subsequent SEA Regulations 2004

<sup>&</sup>lt;sup>4</sup> See Planning Advisory Service <u>www.pas.gov.uk</u>

# 8 Background to the local plan

- 8.1 The Local Plan replaces the Unitary Development Plan 2003 and is the new name for the Local Development Framework. It will provide a wider spatial planning framework and will seek to provide guidance for the Merton's Sustainable Community Strategy (2009-2019) formally also known as the Community Plan. It looks forward 10 years and will set out strategies and polices for the development and use of land as well as broader spatial matters. It consists of a number of separate documents setting out different types of planning guidance.
- 8.2 Merton's local plan contains a number of documents, which will make up Merton's local plan:
  - · Core Planning Strategy;
  - Site and Policies;
  - Proposals Map; and,
  - South London Waste Plan.
- 8.3 The current document being prepared is the Site and Polices Plan and Policies Map. The details of other documents already prepared or proposed are provided in the Local Development Scheme (LDS).
- 8.4 Merton's Core Planning Strategy (2011), is a key document of Merton local plan. It sets out the Merton's strategic objectives and spatial vision of the planning framework for the borough. Furthermore, the Core Planning Strategy brings together strategies relating to land use in an integrated manner to provide a long term spatial vision and means to deliver that vision.

# 9 Purpose of the Sites & Polices and Policies Map

- 9.1 As highlighted earlier in this report, the Site & Polices Plan and Policies Map forms part of Merton's local plan. It contains policies to help the council to implement its Core Planning Strategy polices to ensure all proposed development reflects the spatial vision for the borough in with regional and national guidance.
- 9.2 The Sustainability Appraisal for the Sites & Polices Plan and Polices Map has been undertaken in full using the Sustainability Framework. However, to reduce the length of this SA document the full set of tables has not been included, instead a set of summary tables and brief summary of the important points has been set out. In line with government guidance this is appropriate as the appraisals level of detail has been applied in accordance to the spatial scale, size and possible environmental effects of the policies.
- 9.3 Overall, the development polices perform well against the sustainability objectives. Again the same can be said of the site allocations. This reflects the approach to selecting development sites for inclusion in the document, sites with significant planning constraints and those which contradict Merton's spatial strategy and vision were excluded.
- 9.4 Previous assessments did identify a small number of '*negative, uncertain or no significant effects*' regarding specific sustainability objectives. Such findings are not seen as a negativity overall but an opportunities to improve, strengthen and develop polices.
- 9.5 In the case of the site allocations these finding did not only identify issues but highlight opportunities to mitigate adverse effects, for example: modifying a site's boundary, revising a site's allocation/designation or by excluding a site altogether.
- 9.6 The changes to the Policies Map have been assessed during the preparation stages of the Policies Map. The Polices Map visually demonstrates polices in other documents that form the local plan. When adopted, the Policies Map will identify the areas of Merton to which various development plan policies will be applied.
- 9.7 In accordance, with national guidance note 1, the Policies Map for Merton will therefore show the following information:
  - · Areas of protection, including locally designated areas

- Areas at risk from fluvial flooding (areas within Flood Zones 2 and 3);
- Sites allocated for particular land use and development proposals included in any adopted development plan document;
- Areas to which specific policies apply, such as existing business areas and town centre boundaries

#### What is sustainable development?

- 9.8 Sustainable development seeks to achieve improved quality of life, community well-being and sustainable economic growth while protecting against environmental deprivation, depletion of resources and loss of biodiversity. The most commonly used definition is *"development that meets the needs of the present without compromising the ability of future generations to meet their needs"* (Bruntland, 1987).
- 9.9 The revised UK Sustainable Development Strategy (March 2005), Expands further on what sustainable development means in terms of the following 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; and,
  - Using sound science responsibly.
- 9.10 The National Planning Policy Framework (NPPF) sets sustainable development at the heart of the planning system. The NPPF set out the Government's planning policies for England and how these are expected to be applied. The NPPF sets out the requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.
- 9.11 The NPPF seeks to provide a framework within local councils that are accountable to local people, assist local people to produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 9.12 The 3 objectives of the NPPF are:
  - To put unprecedented power in the hands of communities to shape the places in which they live;
  - To better support growth and give the next generation the chance that present generation has a decent home, and to

allow the jobs to be created on which our prosperity depends; and,

- To ensure that the places we cherish our countryside, towns and cities are bequeathed to the next generation in a better condition than they are now.
- 9.13 Merton Council has published a Waste Management Strategy, a Sustainable Community Strategy and a Climate Change Strategy which set out in detail context for sustainable development in the borough. The preparation and implementation of planning documents within the Merton's Local Plan 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, outlining production schedule of the Local Plan can be found in the Local Development Scheme (LDS).
- 9.14 This document forms a Sustainability Appraisal Report (SAR) incorporating the requirements of a strategic environmental assessment (SEA Directive<sup>5</sup>). 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 Manual <sup>6</sup> and the CLG SEA Practical Guide (2005).

CLG guidance identifies five stages to undertaking sustainability appraisal:

- Establishing the scope of appraisal;
- · Assessing effects and considering alternatives;
- · Preparation of a Sustainability Appraisal Report;
- · Consultation; and,
- Monitoring the effects of implementing the Plan.
- 9.15 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.

#### Equalities Analysis (Impact Assessment)

9.16 The Race Relations Amendment Act 2000, Disability Discrimination Act 2005 and the Equality Act 2010 require an Equality Analysis (previously known as an Equalities Impact

<sup>&</sup>lt;sup>5</sup> European Directive EC/2001/42 and the subsequent SEA Regulations 2004

<sup>&</sup>lt;sup>6</sup> See Planning Advisory Service <u>www.pas.gov.uk</u>

Assessment (EQiA)) to be carried out for all services and policies delivered by Local Authorities.

- 9.17 The purpose of the EQiA is to assess the impact of a policy, strategy or service in the borough regarding race, gender and disability. The consideration of religion, age and sexual orientation are also encouraged.
- 9.18 A EQiA was undertaken for Merton's Core Planning Strategy in July 2010. This considered the equality affects to equality groups against Core Planning Strategy key themes, which included housing, employment, community facilities, transport and accessibility. The development polices complement the Core Planning Strategy, by providing detailed to guide development and to be used in the assessment of planning applications. In addition an EQiA was also undertaken for the South London Waste Plan in 2011.

#### 10 Appraisal methodology

- 10.1 The Council's approach to undertaking Sustainability Appraisal (SA) in the preparation of this part of the local plan as well as other documents within the local plan are in line with Government guidance on 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks" published by the former ODPM in 2005. The guidance is also designed to ensure adherence with the European Strategic Environmental Assessment or 'SEA' Directive 2001/42/EC and the SEA Regulations.
- 10.2 Government guidance identifies 5 stages of appraisal (A to E) that must be carried out as part of the preparation of documents. The key tasks are outlined below.

# **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**

#### Table 1: Stages of a Sustainable Appraisal

Stage	B: Developing and refining options and assessing effects
•	B1: Testing the Plan objectives against the SA framework.
•	B2: Developing the Plan options.
•	B3: Predicting the effects of the Plan.
•	B4: Evaluating the effects of the Plan.
•	B5: Considering ways of mitigating adverse effects and maximising beneficial effects.
•	B6: Proposing measures to monitor the significant effects of implementing the Plans.
Stage	C: Preparing the Sustainability Appraisal Report
•	C1: Preparing the SA Report.
Stage	D: Consulting on the preferred options of the Local Plan document and SA Report
•	D1: Public participation on the preferred options of the Plan and the SA Report.
•	D2 (i): Appraising significant changes.
DPD S	STAGE 3: Examination
•	D2 (ii): Appraising significant changes resulting from representations.
DPD S	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.

- 10.3 The framework that is used to appraise changes to be included in these documents 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 20 sustainability objectives set out in Table 2 represent a revision of the objectives, but have incorporated all the original subjects.
- 10.4 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.

Sustainability objectives	Key issues	Indicators, targets objectives
Environment	objectives	
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 and water.	<ul> <li>Planning to adapt to climate change seeks to embed the management of climate change by: <ul> <li>assessing risks and opportunities;</li> <li>taking action in any identified priority areas;</li> <li>develop an adaptation strategy and action plan; and,</li> <li>Implement, assess and monitor the actions on an ongoing basis.</li> </ul> </li> <li>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.</li> </ul>

#### Table 2: Sustainability Framework objectives

	Merton has been in the forefront for developing strategy for carbon reduction and is eager to build on this progress by focussing on carbon reduction from new developments and also from other energy saving	Ensure specific measures to improve energy efficiency and reduce greenhouse gas emissions are used in new developments, refurbishment and/or renovations and extensions.
2. Energy and carbon reduction	initiatives via Merton's Climate Change strategy, Furthermore, design measures introduced to address climate change will also help improve energy efficiency and energy from waste schemes can also help to reduce carbon.	Use sustainable energy systems as widely as possible. Improve the energy performance and reduce emissions from dwellings within Merton.
3. Biodiversity	Merton has a rich wealth of habitats and species that are 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.	Further protect and enhance all existing designated sites. Reduce the area of the borough deficient in access to areas of natural green space.
4. Access to nature and open space	Merton enjoys an excellent provision of open space especially existing commons (Wimbledon and Mitcham) 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.	Improve the access to and quality of open spaces. Conserve and protect existing trees against damage and unnecessary removal.
	The creation of the Wandle Valley Regional Park within London's Green Grid will help improve access to nature and open space as well as create recreation opportunities.	

	Affairs (DEFRA) has produced a strategic noise map for	To Improve amenity by minimising the impact associated with noise.
5. Noise	major airports, roads and railways in London and the council will have regard to this information. The council will also have regard to the Noise Action Plan for London and the Mayor of London's Ambient Noise Strategy. These mapping identifies areas in Merton where noise levels need to be managed. The priorities in Merton are the following along the A3 Kingston-by-pass, Plough Lane/Haydons Road junction, Cricket Green and South Wimbledon junction.	
6. Waste	move away from land filling waste. The South London Waste Plan aims to divert 100% of waste from landfill will make a major	by re-use and recycling in line with reducing net carbon emissions and the European waste hierarchy and to
	In Merton there is a need to manage waste sustainably via energy from waste that will also contribute to mitigating against climate change and energy and carbon reduction (see above).	

7. River and water quality use, resources and wastewater infrastructure	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.	Reduce water pollution and improve water quality and resources in river Wandle and Beverly Brook. Improvement of the biological and chemical status of the River Wandle and Beverly Brook to good by 2027 (Environment Agency).
8. Flooding	Merton experiences flooding from a number of sources especially fluvial flooding from the river Wandle, Beverly brook and their tributaries. Surface water and critical drainage problems are also an issue in some isolated parts of the borough.	Reduce the flood risk to people and property from all sources of flooding including surface water flooding. Compliance with Flood and Water Management Act 2010.
9. Air quality	Air quality is improving in Merton but there is further scope to reduce atmospheric pollution across the borough buildings.	Ensure the risks of pollution to human health and all areas of the boroughs environment are reduced
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 transport and community facilities accessibility.	Increase the use of urban brownfield land.
11. Access to 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 in the Olympics and the legacy after the games.	Improve the access to and quality of open spaces. Improve access to cultural and leisure facilities.

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12. The Built and heritage environment	Merton has a number of statutory and locally listed buildings within the borough.	Reduce heritage buildings at risk on English Heritage at Risk Register.
	It is important that any development is sensitive to Merton's historical assets.	No loss of Listed Building (local and statutory) and Historic Parks and gardens.
	Improving, understanding and value of historical assets in Merton.	Protect and enhance the boroughs archaeological heritage (including remains) and historical assets (including walls and graveyards).
13. Transport	Accessibility to key services, facilities, employment, goods and other amenities is uneven across Merton; with some areas east of the borough	Meet Merton's target of reducing transport CO2 emissions by 45% by:
	having poor transport links to their local centre and essential amenities.	<ul> <li>Reduce the need to travel by car.</li> <li>Increase the use of sustainable transport</li> </ul>
	Sustainable transport in Merton has improved over the years.	modes including walking and cycling.
	It is essential that this is built upon in Merton.	
Social obje	ctives	
14. Health and well being	There are large disparities in health and well-being across the borough namely in the east of the borough which has	Improve health equality and access to health and well- being facilities.
	a higher.	Encourage regular participation in sport and recreation.
15. Poverty and social inclusion	There are clear disparities in income, access to social and community and infrastructure	Ensure everyone has access to basic services.
	between the eastern and western part of the borough.	Alleviate the risk of fuel poverty.

16. Diversity and equality	Merton has a wide cultural, ethnic, faith based and racial diversity.	Promote equality where a vibrant socially inclusive community is encouraged.			
17. Crime and fear of crime	Building on Merton's historical low crime figures. Creating safer and secure communities for all in the borough.	Maintain low rates of crime and reduce fear of crime.			
18. Housing	Currently in Merton there is a difference in affordability, level of provision, quality, environmental performance, design and distribution of housing within the borough.	<b>Housing Target</b> Meet housing need (320 units per year).			
19. Affordable housing	The London Plan and Merton local plan seek to deliver housing provision complemented by adequate social and other infrastructure and that the reuse of surplus industrial land is managed. The provision of affordable is a priority.	<ul> <li>Affordable Housing</li> <li>▶ 10 units and above: 40% on site.</li> <li>▶ Between 1-9 units: 20% cash in lieu to create additional affordable homes.</li> </ul>			
Economic o	Economic objectives				
20. Education and skills	There is a disparity of skills and employment in the borough. Namely higher level of non- educational achievement or attainment and training in the east of the borough.	Increase opportunities to education and training. The percentage of pupils in local authority schools achieving 5 or more A*-C grades (or equivalent) including English and maths in Merton and regeneration areas. Improve the potential to enable more employment options and training in the borough.			

21. Work and the economy	There are disparities in employment levels in the between the east and west of the borough, with east having lower employment levels, range of employment and employment opportunities.	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
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# 11 Scoping

- 11.1 Establishing the scope for appraisal has involved two key exercises: reviewing other relevant plans, plans and programmes and collating information about the environment, economy and social issues. Key documents that have informed this task include:
  - National Planning Policy Framework (NPPF) [2012];
  - Strategies prepared by the Mayor of London;
  - The London Plan;
  - · Strategies prepared by London Borough of Merton;
  - All London Green Grid SPG;
  - · Green Grid Framework: 8 Wandle Valley Area (Draft);
  - · Green Grid Framework Arcadian Thames (Draft);
  - Merton Town Centre Capacity Study 2011;
  - Merton Open Space Study 2010;
  - Merton Employment Land Study 2010;
  - Merton Town Centre Study update 2010;
  - Merton Appropriate Assessment;
  - Merton's affordable housing viability study 2010;
  - Merton dwelling conversions background paper 2009;
  - Merton tall buildings background paper 2009; and,
  - Wandsworth, Merton, Sutton and Croydon Level 1 Strategic Flood Risk Assessment December 2008 and Level 2 SFRA July 2009.
- 11.2 The scope and context of the information gathered since January 2012 has enabled a framework of sustainability objectives to be established, 'the Sustainability Appraisal Framework'. The SA Framework provides a structure for comparing proposals and options this document.

#### 12 Habitats Regulations Assessment Regulation 48 Habitats Regulations Assessment of the local plans

- 12.1 The EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna) passed in to domestic law by ay 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 to Natural 2000 sites (also known as European sites) must be subject to Appropriate Assessment.
- 12.2 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 (Wetlands sites) and Special Areas of Conservation.

### Habitats Regulations Assessment Screening

- 12.3 The Habitats Regulations identifies Merton Council as the Competent Authority which 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.
- 12.4 A consideration has been made of the objectives, policies and proposals of the document against the conservation objectives for European sites and this is provided as Appendix (D) of this SA report. Whilst, the screening process has determined that it is not likely that this document would not lead to any adverse impact on the integrity of European 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 the stag beetle; and,
  - Recreation can have an adverse impact on the habitats and/or stag beetle.

## 13 Summary of influence of appraisal

- 13.1 The findings of the appraisal has influence and has been used to help define the most sustainable polices in terms of, where the 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.
- 13.2 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 specific proposals and policies and is the subsequent aim of Sites & Policies Plan and Polices Map.

### 14 Monitoring

- 14.1 The submission SA/SEA has been developed taking account of other local, regional, national and European plans and guidance.
- 14.2 The SEA Directive requires that The SEA Directive requires that: "Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, interalia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action" (Article 10.1)."
- 14.3 DCLG guidance on SA for DPD states that SA Reports shall include a description of the measures envisaged concerning monitoring and those proposals for monitoring must be considered early in the SA process, included in the SA Report, and reviewed in the light, of any responses to consultation.
- 14.4 The London Borough of Merton needs to ensure that monitoring is appropriate of the need of the Sites & Polices and Policies Map and such monitoring is up-to-date, reliable and sources are referenced.
- 14.5 The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken. However, this may be difficult to implement monitoring mechanisms for unexpected effects.
- 14.6 However, in line with European Commission guidance, this provision may be understood as covering effects which differ from those which were predicted, or unforeseen effects which are due to changes of circumstances.
- **14.7** The Council will publish the results of the monitoring of the local plan in the annual Authority Monitoring Report. Contingencies procedures have been developed to identify and address poor performance against objectives or unforeseen adverse impacts of the local plan.

#### 15 Background to the Development Management Policies

- 15.1 The development management policies gives effect to the Core Planning Strategy by detailing development requirements and constraints that will contribute to the delivery of Merton's spatial strategy.
- 15.2 Upon adoption, the Sites & Polices and Polices Map will supersede the remaining development management provisions of the Merton's Unitary Development Plan (2003); the list of superseded policies

are available in the appendices of the Sites and Policies Plan. It should be noted that the London Plan (2011) includes development management provisions that forms part of the statutory development plan for all London boroughs. Where there are such provisions, it has not been necessary to duplicate these in Merton's Sites & Policies and Polices Map.

15.3 The focus of this appraisal is to assess the submission of this document which will become Merton's local plan with Core Planning Strategy.

### 16 Sustainability Appraisal of the development management policies

16.1 A high level and robust approach to the appraisal of the development management policies has been adopted. It focuses on the principal themes into which the individual policies are arranged: protecting Merton's character and residential amenity, conservation and heritage, the environment, open space and biodiversity, housing, employment and economic development, town centres and retail development, infrastructure, community and education facilities, implementation, resources and monitoring - and how these perform against Merton's sustainability objectives. The assessment has been carried out by council officers and the following scoring symbols are used in the tables below to identify positive and/or negative effects.

# Development polices assessment against the Sustainability Appraisal Objectives

# Centres, Retail and other town centre uses: DM R1-DM R5 and DM R7

- 17.1 The six Centres, retails and other town centre policies (DM R.1 DM. R.7)score well against sustainability objectives concerned with economic development and employment. These polices seeks to ensure that any appropriate development proposals are controlled in a manner where they would not result in a negative impact to resident's access to basic needs services, access to health facilities and support access to employment.
- 17.2 DM R1- DM R7 polices also help to encourage town centre improvements and development that will contribute to the economic vitality and viability of town centres are sustainable. This policy approach would be beneficial to people who live, work and visit the borough.

- 17.3 **DM R1 Location and Scale of Development in Merton's Town Centres:** this policy scores particularly well against sustainability objectives concerned with economic development. The policy seeks to ensure that any appropriate development proposals are controlled in a manner that will not result in a negative impact on resident's ability to access basic services and facilities, access to employment, and to ensure that all of their proposals are developed in sustainable locations within the borough.
- 17.4 **DM R2 Out of Centre Retail Development:** this policy scores particularly well against sustainability objectives concerned with economic development. The policy seeks to direct town centre type uses towards town centres locations to maintain their vitality and viability. This policy approach can have a positive impact for residents by creating employment opportunities and maintains access to local services and facilities for people, who live, work and visit the borough.
- 17.5 **DM R3 Protecting Corner/Local Shops:** this policy scores particularly well against a range of sustainability objectives. The policy seeks to ensure that any appropriate development proposals are controlled in a manner where they would not result in a negative impact to the local community, by ensuing that local services and facilities remain accessible to local residents in their local area and reduces the need to travel by car. This approach also means the policy scored favourably against transport and climate change sustainability objectives.
- 17.6 **DM R4 Protecting of Shopping Facilities within Designated Shopping Frontage: this policy scores well against a number of** sustainability objectives. The policy seeks to ensure the vitality and viability of Merton's town centres and neighbourhood parades, by enabling the provision of a wider range of retail services and facilities. This will lead to greater consumer choice, business and employment opportunities for the community.
- 17.7 **DM R5 Food and Drink Uses/Leisure and Entertainment:** this policy scores particularly well against sustainability objectives. The policy seeks to ensure any development proposals are controlled in a manner that would not result in a negative impact on the local area and amenities. This will be achieved by ensuring that public houses (A4 Use Class) and hot food take-aways (A5 Use Class) do not have an adverse affect on the local community and local environment with regards to noise, opening hours and litter control.
- 17.8 **DM R6 Culture, Arts, and Tourism Development:** this policy meets a number of sustainability objectives including access to culture and social activities, by ensuring any appropriate development proposals

are controlled in a manner that would not result in a negative impact on the local area or community. This will be achieved by supporting new cultural, arts and tourism development in the most sustainable locations within the borough. The policy also seeks to protect existing culture and social activities and encourages more cultural, arts and tourism development in the borough. This approach may lead to more employment opportunities for the local community and meets the sustainability objective to promote and seek access to employment for the community.

17.9 **DM R7 Markets:** this policy meets a number of sustainability objectives particularly the objectives related to employment and Merton's economy. The policy ensures that any appropriate development proposals will not have a negative impact on the local area and community, by supporting the rejuvenation of existing markets and supporting any appropriate development proposals for new markets. This policy approach may lead to creating employment and business opportunities for start-up businesses which in turn will benefit the wider community.

#### Employment DM E1- DM E4:

- 17.10 The employment policies seek to protect existing employment sites to ensure that there is adequate employment uses operating within the borough are in appropriate locations and are accessible by public transport ensuring the need to travel by car is reduced. The policies, score favourably on the sustainability objectives with the aim of promoting social cohesion, seek to create greater employment opportunities, seek to improve Merton economy and furthermore, seek to provide access to essential services for Merton's growing population.
- 17.11 **DM E1 Employment Areas in Merton:** this policy meets a number of sustainability objectives including objectives concerned with work employment and with Merton's economy. The policy seeks to support growth in business and jobs and to enable a diverse and robust economic base, by; ensuring that sites and premises maximise opportunities for business.
- 17.12 **DM E2 Offices in town centres:** this policy meets a number of sustainability objectives including objectives concerned with employment. This policy helps to ensure that office employment in town centres is protected, which in turn will; improve employment opportunities in Merton and increase the ability of town centres to attract and accommodate a range of office-based businesses employment to the borough.
- 17.13 **DM E3 Protecting of scattered employment sites:** the policy meets a number of sustainability objectives including objectives concerned

with employment. The policy seeks to ensure that scattered employment sites within the borough are protected where there is a need; by supporting a range of businesses/employment opportunities on these sites. Furthermore, the policy goes further and seeks to ensure the reduction of distances travelled by the local community across the borough to access employment, by ensuring that development proposals consider access to public transport. This policy approach will assist creating sustainable local communities.

17.14 **DM E4: Local employment opportunities:** the policy meets a number of sustainability objectives including objectives concerned with employment and work. The policy seeks to ensure that any appropriate development proposal within the borough providing greater employment and training opportunities for the local community.

#### Housing DM H1 -DM H5:

- 17.15 The housing policies seek to ensure that there is adequate housing support and housing mix to meet the needs of different households such as families with children and vulnerable people Furthermore, the housing polices seek to ensure that appropriate development is accessible to public transport, local shops, community and health facilities and other essential services. The housing policies aim to promote social cohesion, addressing poverty and promoting health and wellbeing.
- 17.16 **DMH1 Supported Care Housing:** the policy meets a number of sustainability objectives including objectives for social inclusion and addressing housing needs. This policy approach seeks to encourage mixed communities and social cohesion.
- 17.17 **DMH2 Housing Mix:** the policy meets a number of sustainability objectives including those objectives concerned with social inclusion. The policy seeks to create a mix of housing that are of good design that is suitable for the local environment and wider community, by ensuring that any appropriate development proposals are accessible to essential service and public transport. The policy approach seeks to encourage mixed communities and social cohesion.
- 17.18 **DM.H3 Support for affordable housing:** the policy meets a number of sustainability objectives including affordable housing, poverty and social inclusion
- 17.19 **DM. H4 Demolition and redevelopment of a single dwelling house:** the policy meets a number of sustainability objectives including natural resources and climate change by helping to compensate for resources lost through demolition and rebuilding of single dwelling houses

17.20 **DM. H5 Student housing, other housing with shared facilities and bedsits: the policy meets a number of sustainability objectives** and helps ensure housing choice to meet the needs, of Merton's diverse community.

#### Design and Built Environment DM1- DM7

- 17.21 The design policies are an important element of a local plan sincethey can help to ensure a high quality built environment and public realm which will have positive social effects on public health, safety and travel. High quality design is also essential to balancing the protection of the historic environment with a green or sustainable infrastructure approach that will address climate change and reducing carbon emissions.
- 17.22 **DM D1 Urban design and public realm**: the policy meets the majority of the sustainability objectives; it will help to promote high quality design that respects the borough character and ensures sustainable environments for people who live, work and visit the borough.
- 17.23 **DM D2 Design considerations in all developments:** the policy meets the majority of the sustainability objectives as it covers a variety of design considerations that would need to be accounted for in development proposal. The policy seeks to ensure that appropriate development proposals meeting these design criteria will promote high quality design that respect the local character of areas within the borough and ensure sustainable environments for people who live, work and visit the borough.
- 17.24 **DM D3 Alterations and extensions to existing buildings:** the policy meets a number of sustainably objectives including those promoting good design and historic environments. The policy encourages that development proposals achieve high quality design. The policy also helps to ensure that any alteration and extension to existing buildings contribute positively to the character and quality of an area within the borough.
- 17.25 **DM D4 Managing heritage assets:** the policy meets a number of sustainability objectives, including those relating to social inclusion. The policy encourages the preservation and enhancement of Merton's heritage assets. This policy approach will help to create a sense of place, encourage belonging and pride in the borough for the wider community.
- 17.26 **DM D5 Advertisements:** the policy meets the sustainability objectives concerned with social inclusion seeking to ensure that

development proposals do not result in a negative impact to the local environment or public safety.

- 17.27 **DM D6 Telecommunications:** the policy meets the sustainability objectives concerned with social inclusion by ensuring that development proposals would not result in a negative impact to the local environment or public safety.
- 17.28 **DM D7 Shop front design:** the policy meets the majority of the sustainability objectives and covers a variety of design considerations concerning development proposals. The policy seeks to encourage high quality design that protects local amenities.

#### Environnemental protection polices: EP1- EP4

- 17.29 Environment protection policies seek to ensure development in Merton contribute to mitigating climate change and and adapt to the effects of climate change, seek to improve energy efficiencies and seek to reduce the adverse impact of climate change on humans, animals and the environment.
- 17.30 **DM EP1 Opportunities for decentralised energy networks:** The policy meets a number of sustainability objectives with many positive impacts in relation to energy consumption and reduction of green house gas emissions. There are also potential associated benefits in terms of fuel security and fuel poverty; the requirement for renewable energy and decentralised energy will contribute to meeting the UK's reduction in carbon emission targets and renewable energy targets.
- 17.31 **DM EP2 Reducing and mitigating against noise:** The policy generally has a positive outcome in meeting the broad principles of all of the sustainability objectives and in particular climate change and has a positive impact on the health and well being. This policy helps to ensure that noise and vibration is controlled and managed by minimising impacts to the environment and people.
- 17.32 **DM.EP3 Allowable solutions:** The policy meets a number of sustainability objectives including environmental and social objectives. The policy encourages sustainable development and ensures any carbon savings can benefit local communities. This policy approach could help address social and economic inequalities, for example fuel poverty.
- 17.33 **DM. EP4: Pollutants:** The policy meets a broad number of sustainability objectives and seeks to avoid actions that will generate environmental, social and economic harm.

#### Flooding and Drainage DMF1-DMF2

- 17.34 The two Flood Management polices seeks to ensure individual development proposals will have not have an adverse impact to the environment and that essential infrastructure including schools and hospitals will not be at risk. These policies are informed by the Strategic Flood Risk Assessment, and the Environment Agency data on surface water flooding.
- 17.35 **DM F1 Support for managing flood risk:** the policy meets a number of sustainability objectives including the objectives concerned with flooding and land use.
- 17.36 **DM F2 Sustainable Drainage Systems (SuDS):** the policies meet the sustainability objectives that relate to the safeguarding and promotion of the natural environment, by seeking to ensure that individual development proposals will have no adverse impact, that essential infrastructure will not be at risk and reduce the risk of existing surface water flooding and to help reduce future problems.

#### **Community Facilities DMC1- C2**

- 17.37 The community facilities policies seeks to ensure that there is adequate community facilities including healthcare, places of worship and sufficient nursery and schools places to meet the needs of Merton's growing population and diverse community.
- 17.38 **DM C1 Community facilities:** the policy meets a number of sustainability objectives including the objectives concerned with reduction of social exclusion and improvements to the community health and well being. The policy ensures the protection and thereby resists the loss to existing community facilities. This policy approach facilitates the development of mixed and balanced communities.
- 17.39 **DM C2 Education:** the policy generally meets a number of sustainability objectives particular objectives that support access to education and basic needs and social inclusion.

## Open Space, Nature Conservation, Leisure and Culture DMO1 – DMO2

- 17.40 The Open space, Nature Conservation, Leisure and Culture policies seeks to ensure that there are adequate open space, leisure and culture facilities across the borough to meet the needs of Merton's diverse community.
- 17.41 **DM 01 Open Space:** the policy meets a number of sustainability objectives relating to green issues particularly well, including health and wellbeing and climate change. The protection of the open spaces will help ensure that development proposal does not have a negative

impact on the local environment and the policy helps ensure that any appropriate development is concentrated on the most appropriate brownfield land. This policy approach will help enhance the quality of life through the provision of open spaces for both active and passive leisure activities. Open spaces and their vegetation can also assist surface water runoff and help to mitigate flood risk to properties and people.

17.42 **DM O2 Trees, hedges and landscape features:** the policy meets a number of sustainability objectives and objectives concerned with green issues. The policy seek to ensure the sustainability objectives relating to green issues by improving biodiversity within the borough as well as ensuring development that does not have a negative impact on the local landscape features within the borough.

#### **Transport and sustainable Transport DMT1-DMT5**

- 17.43 The transport and sustainable transport policies seek to promote greater use of sustainable transport, encourage better transport interchanges and improve accessibility for all. The policies score favourably against the sustainability objectives with the aim of promoting social cohesion, accessibility to essential services and sustainable objective on climate change by reducing the adverse transport impact on the environment.
- 17.44 **DM T1 Support for sustainable transport and active travel and DM T2 Consideration of transport impacts of development:** These policies meets a number of sustainability objectives including reducing the effects of climate change, air quality and transport leading to improving accessibility by all modes.
- 17.45 The policies seeks to encourage sustainable transport and active travel that have a positive impact on improving travel journeys, patterns and promotes greater use of travel by modes other than the car. This policy approach can lead to an improvement in health and well being from increased levels of physical active travel and help reduce pollution as a result.
- 17.46 **DM T3 Applying relevant car parking and servicing standards:** The policy meets a number of sustainability objectives including reducing the effects of climate change, air quality and transport leading to improving accessibility by all modes by seeking the London Plan parking standards is met and encourages permit free development that will help reduce the amount of travel by car.

- 17.47 **DM T4 Contribution and support of transport infrastructure improvements:** The policy meets sustainability objectives on reducing the adverse impact of climate change and air quality. This policy helps to secure improvements to accessibility for all by sustainable modes, in particularly public transport, by ensuring that transport infrastructure have regard to new appropriate developments proposals and to the wider transport needs by providing appropriate public transport facilities. This policy also impacts positively on health and wellbeing.
- 17.48 **DM T5 Consideration of the connections and access to the road network**: The policy meets sustainable sustainability objectives on climate change, air quality, improving accessibility by all modes and improving public transport accessibility. It encourages new development to provide a positive contribution to sustainable transport and environment by minimising impacts on the movement of people and goods to appropriate areas in accordance to the road hierarchy. The policy also seeks to ensure that improvements to interchange facilities would potentially bring wider benefits to the townscape and would allow the full potential of each area to be realised, thereby making the best use of land within the borough.

**Appraisal of site allocations** 

## 18 Background to the site allocations

- 18.1 Sites allocations give effect to the Core Planning Strategy by allocating sites for development in the borough. For sites that are suitable for waste management, the South London Waste Plan has also been subject to a sustainability appraisal.
- 18.2 This sustainability assessment does not therefore seek to revisit the appraisal of the South London Waste Plan or Core Planning Strategy, but instead focuses on the performance of the development sites and site designations against the sustainability objectives established in Merton's Sustainability Appraisal Scoping Report (2006).

## **19 Predicting the effects of the site allocations**

- 19.1 A 'two tier' approach to the appraisal of the site allocations has been adopted. First, the assessment considers the overall performance of the policies against Merton's sustainability objectives.
- 19.2 Second, the assessment has appraised each site included in the document against the objectives. The assessment has been carried out by council officers and the following scoring symbols are used in the tables below to identify positive and/or negative effects. The results of this assessment indicate that there are a number of direct positive effects in relation to the sustainability objectives.
- 19.3 In the absence of a sites allocation, development proposals on individual sites would be assessed against the relevant planning policy framework, which has been designed to deliver sustainable development.
- 19.4 However the site allocations provides an additional level of benefit in that it's a practical assessment and can be a proactive in identifying opportunities based on site context and community use. In addition, by engaging with landowners and developers, the site allocations can assist delivery by proactively setting up an approach to site development in the early stages.

## Appraisal of sites

- **19.5** As with the previous SA, sites were considered against a number of criteria. These include:
  - · Deliverability.
  - Existing designated uses.

- Environmental constraints.
- 19.6 In some cases sites promoted for development by landowners and developers may not be included for the following reasons:
  - Site is the subject of an undetermined planning application.
  - Where potential uses on the site are already set out in the Core Planning Strategy.
  - Potential development is being explored through another route.
  - Where the site already has the same established use as what is being proposed.
  - Where the suggested development is not deliverable within the plan period.
- 19.7 The following pages are an assessment of the included sites against Merton's sustainability objectives. The findings from the assessment shows that the combined have an impact on site allocations overall had a positive impact when assessed against Merton's sustainability objectives. The individual objectives had a varying degree of performance both positively, negative and neutral. The performance of these individual objectives generally correlates with the appraisal of the site allocations approach.

## Table 5: Key to Symbols Used in the Appraisal insert table

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
0	No Significant Effect on Sustainability Objective
-	Minor Negative Effect on Sustainability Objective (normally indirect)
	Significant Negative Effect on Sustainability Objective (normally direct)
?	Uncertain Effect on Sustainability Objective

Site 1: Hartfield Road car park, Wimbledon

Current use: Car park and retail units

**Site Allocation:** Any of the following or an appropriate mix of town centre type uses such as retail (A1 Use Class), café and restaurants (A3 Use Class), community (D1 Use Class), cultural, leisure and entertainment (D2 Use Class), offices (B1[a] Use Class) and hotel (C1 Use Class). The site may incorporate residential development (C3 Use Class) on upper floors.

#### Delivery timescale: 2019 – 2024.

**Site location:** The site is a public car park (suis generis Use Class). To the North are commercial (including Morrison's supermarket, TK Max and Robert Dyas) and residential units and beyond the adjacent roads are a wide range of town centre type uses including commercial, office, café and restaurants, leisure and recreation, and residential uses.

The site is located within the Wimbledon town centre boundary and the surrounding buildings range between four and two storeys in height. The part of the site falls within Wimbledon Broadway Conservation Area. The site is in an area with high accessibility to public transport services (PTAL 6a).

# 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 ++ 0 0 ? 0 + + + ++ +

**SA: Comments:** The sustainability objectives are favourable to development on this site. However, the objectives for climate change, flooding, air pollution, noise and crime have scored *minor negative effect or uncertain effect;* this is because any development on this site would have an impact especially in the areas mentioned above due to location and potential increase in transport.

Therefore, it is imperative that mitigation measures for climate change, flooding (from all sources), and noise air pollution are part of any appropriate development proposal including mixed use.

With any development within a town centre there is the potential for crime and the fear of crime therefore, any development must ensure there are adequate crime prevention measures in line with *secured by design* as part of the layout and design.

Furthermore, although the site is not adjacent or in the near vicinity of historical assets, any design and layout plan at this site must be sensitive to the area and surrounding historical environment.

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable to development on this site. However, the sustainability objective issue highlighted above must be address as part of any appropriate development proposal; thus ensure the development is sustainable and would not have an adverse impact to the environmental, social or economic effect of the town centre. As there are a number of sites in Wimbledon town centre this site and others (site 16, 28, 31 and 63) should be allocated in conjunction to ensure no adverse environmental, social and economic impact.

Site 2: 43-45 Palestine Grove Colliers Wood SW19 2QN

Current use: Vacant workshop.

Site Allocation Residential (C3 Use Class).

Delivery timescale: 2014 – 2016.

**Site location:** The site is occupied by a vacant and dilapidated storage/warehouse building with high brick and timber fencing. Immediately east and adjoining the site is a similar sized property with a building being utilised by a manufacturing business (electric slotmeters London). Residential uses generally comprising two/three storey terraced homes predominate in the nearby the site. Immediately to the west of the site is a private car park with approximately 10 spaces.

												Sus	tair	nabi	ility	Ob	ject	tives	5:		
1	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21																				
0	0	0	+	?	0	0	-	?	++	+	0	+	+	++	+	0	++	0	+	+	

**SA comments:** The sustainability objectives are favourable to residential development on this site. However, there are 'uncertain' highlight within the environmental sustainability objectives namely the objective 5: Noise and objective 8: Flooding.

Objective 5: Noise, the 'uncertain' score is due to the location of the sits near Christchurch Road which is a busy main road connecting Colliers Wood town centre and East Mitcham. The road is heavily used by HGV lorries, buses and is to some extent a 'pass through' road. Therefore, it is essential that development proposals must adopt suitable mitigation measure against noise.

Objective 8: Flooding, the 'indirect negative effects' is due the site being within flood zone 3.

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable for site allocation for residential development for this site. However, any appropriate development proposal will need to have flooding and noise mitigation measures as part of design and layout of the development proposal.

**Site 5:** Colliers Wood Community Centre SW19

Current use: Community Centre (D1 Use Class).

**Site Allocation:** Mixed use community (D1 Use Class), which could include space for a library) and residential (C3 Use Class). Could also include commercial uses such as a café on street frontage.

Delivery timescale: 2019 – 2024.

**Site location:** The site is located within Colliers Wood town centre on the high street. The site is surrounded by a mix of residential, retail with residential on upper floors mostly late Victorian building. The site also falls within an Archaeological Priority Zone. The site is within an area with acod level of access to public transport accessibility (PTAL 5).

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**SA comments:** The sustainability objectives are favourable to a mixed use community led (include library) and residential development. However, there are a number of 'minor negative effects' or 'uncertain effect' scores. If we look at sustainability objective 8: *Flooding* which has scored a minor negative effect the main reason is the site location within flood zone 2 and a critical drainage area (CDA). There are several records of surface water flooding within this CDA. Sustainability objective 5: *Noise* has scored uncertain this is primarily because of the location of the site on a busy PTAL 5 high street that links into neighbouring Wandsworth borough. It is not know it the development would be on the front or towards the back of the site away from the main road.

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable for the preferred option for this site. However, any appropriate development proposal will need to have flooding and noise mitigation measures as part of design and layout of the development proposal. Site 8: Leyton Road Day Nursery SW19 1DJ

Current use: Offices (B1[a] Use Class).

**Site Allocation:** Any of the following or a suitable mix of community (D1 Use Class - education/day centre etc) and residential (C3 Use Class).

Delivery timescale: 2019 – 2024.

**Site location:** This site is adjacent to Colliers Wood town centre boundary and predominately surrounded by residential. The site is adjacent to Wandle Valley Conservation Area (Southern and Eastern boundary), Open Space (Part of the site includes the open space), within an Archaeological Priority Zone. The site is within an area with high level of access to public transport accessibility (PTAL 5).

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**SA: Comments:** the sustainability objectives are favourable to the following or a suitable mix of community (D1 Use Class - education/day centre etc) and residential (C3 Use Class) at this site. However, there a number of 'uncertain effect' and 'negative effect' highlight within the appraisal.

Sustainability objective 5: Noise - this score is due to the location of the site. To the south of the site is Merton High Street and to the east is London Bus Merton Garage/repair garage. Sustainability Objective 8: flooding – this score is due to a small part t of the site being within a Critical Drainage Area (CDA).

#### Recommendation/conclusion:

Overall, the sustainability objectives are favourable for the site allocation highlighted above. The site is an ideal location for any of the options recommended above.. Any development proposal must have as part of design and layout mitigation measures for noise and flooding for development at this site.

Site 9: Mitcham Library, London Road Mitcham CR4 2JB

Current use: Library and other community facilities (D1 Use Class).

**Site Allocation:** Library to be retained and improved (either on site or closer to Mitcham town centre). The remainder of the site considered for an appropriate mix or any of community (D1 Use Class), office (B1[a]) Use Class) or residential (C3 Use Class) uses. Small town centre uses (less than 280 m<sup>2</sup>) would be suitable given the edge of centre location.

#### Delivery timescale: 2019 – 2024.

**Site location:** Mitcham Library and community centre is located within the currently Mitcham town centre. Directly behind the building is a public access footbath to Granfield Crescent. To the west of the site are residential flats. To the east of the library and situated across from the library are retail parades comprising of retail at ground floor level and residential on upper floors. The site lies within an area with high level of public transport accessibility (PTAL 4). The Library building is locally listed. The surrounding area's to the site is susceptible to surface water flooding.

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**SA: Comments:** The sustainability objectives score favourable the site allocation highlighted above. However, sustainability objective 12 *The built and heritage environment* has scored a minor negative effect due to the library building being locally listed any development or redevelopment could possibly have an impact unless development proposals are designed sensitively to the building(s) nearby and the present library building.

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable the site allocation being put forward. However, any development proposals must, enhance the local character of the area, be sensitive to buildings nearby in this case the locally listed library building. Site 14: Taylor Road Day centre

Site 14: Taylor Road Day centre

Current use: Day Centre (D1 Use Class).

**Site Allocation:** Mixed use community (D1 Use Class) and residential (C3 Use Class) or solely residential (C3 Use Class) if the community service is provided elsewhere. **Delivery timescale:** 2019 – 2024.

**Site Location**: The site fronts onto Taylors Road. The site is located in residential houses (2.5 storeys) and the rear of the site backs onto the back gardens of neighbouring residential houses (2.5 storeys). The area has poor levels of transport accessibility (PTAL 2).

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**SA: Comments:** The sustainability objectives are favourable for the site allocation highlighted above. However, sustainability objective 13: Transport has scored an 'indirect negative effect' this mainly due to the poor public transport accessibility to/from the site.

Sustainability objective 14: Health and wellbeing, scores shown above is due the uncertainty as to whether the community service is provide elsewhere hence the score above.

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable for the site allocation highlighted above, however, should the development at this site be solely residential, that the community service for which there is demand should beprovided elsewhere.

Site 15: West Barnes Library

Current use: Library (D1 Use Class).

Site Allocation: Library (D1 Use Class) with residential (C3 Use Class) on upper floors.

Delivery timescale: 2014 – 2019.

**Site Location:** The site is adjacent to a neighbourhood parade. To the north, south and east of the site are office buildings. To the west is the rail embankment that acts as barrier to surface Water flow. The area is in a Critical Drainage Area and is within Flood Zone 2.

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**SA: Comments:** The sustainability objectives are favourable for the library to be retained and re-developed with some residential. However, a number of the environmental objectives have scored a 'minor negative' namely flooding and noise. This is due to the site location within a critical drainage area, adjacent to flood zone 2 and the nearby rail station.

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable to the site allocation use. It is important to note that the library provides vital services to the local community with a number of established essential social and educational actives and services. Therefore, it is imperative that these should still be provided to the local community thus, ensuring greater access to culture, education and skills training and access to opportunities to work. However, the building has become tired and unattractive therefore library redevelopment would be of benefit to the local community. Furthermore, it is very important to note any redevelopment proposals must ensure existing services and activities can still be provided on site.

In addition, as part of any development proposals flooding (all sources) mitigation measure must be incorporated. In addition, as this site is vulnerable to noise, due to site location (near a main line railway to Central London), noise mitigation measure through design and layout is needed.

Site 16: Wimbledon Library and Marlborough Hall

**Current use:** Library (D1 Use Class), adult education (D1 Use Class) and one apartment (C3 Use Class).

**Site Allocation:** Library to be retained and improved. Remainder of site considered for an appropriate mix of any of the following - community (D1 Use Class), retail (A1 Use Class), financial and professional services (A2 Use Class), restaurants and cafes (A3 Use Class), office (B1[a] Use Class) and residential (C3 Use Class).

Delivery timescale: 2019 –2024.

**Site location:** Wimbledon Library is a local listed building located within the town centre boundary. The site is within Wimbledon Hill Conservation Area. The site is in an area with high level of access to public transport accessibility (PTAL 6a).

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**SA: Comments:** The sustainability objectives supports the site allocation use of retaining the public library and for some residential. The site scores positively for a number of social objectives for example poverty and social inclusion (which includes housing and affordable housing).

As the site is a local listed building; sustainability objective 12 *The built and heritage environment* has scored '*uncertain effect*', as we do not know the number of residential units possible for this site and other factors such as design. Until these factors are known it is impossible to measure the effects. In addition, sustainability objective 5: *Noise* has scored a minor negative effect due to the site location within a Major town centre..

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable for development but it must be stressed, any development has a duty to be one that is sensitive and respectful to the local environment and importantly the status of the library building regarding any additional development proposed. It is advised that any development be in line with English Heritage and CABE guidance set out in Merton's planning policies. It is important to note that the library and Marlborough Hall provide vital services to the local community and local schools in the area. A number of established essential social and educational actives and services taking place at this site for example adult education services. It is important that these should still be provided locally to meet needs thus ensuring greater access to culture, education and skills training; and access to opportunities to work. As there are a number of sites (site 1, 28, 31 and 63) in Wimbledon town centre, this site and others should be considered in conjunction to ensure no adverse environmental, social and economic adverse impact.

#### Site 17: Worsfold House/Chapel Orchard

**Current use:** Council offices (Worsfold House – currently used for resident training), school use (Chapel Orchard) and a former surgery.

**Site Allocation:** A suitable mix of school (D1 Use Class) and/or residential (C3 Use Class). **Delivery timescale:** 2018 – 2024.

Site location: The surrounding area of the site is large low-rise buildings with generous spaces between then and many large trees and shrubs. Along the south-western boundary is a footpath (Church Path) with a large publically accessible park (London Road Playing Fields) beyond. To the West is a single story special needs secondary school (Melrose School) and to the west of the access road is a two-storey hostel building (Hall Place). To the north of the site and west of the access road is a single storey office building and a single storey surgery building. To the Northeast is part two-storey special needs school (Cricket Green School) and to the south east is a row of two-storey terrace houses.

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**SA: Comments:** the sustainability objectives are favourable for the site allocation. There may be potential for redevelopment to encompass either or both of the school sites to the east and west, ensuring the provision of the school(s) in a modern facility; this would need further investigation as to whether this is needed. Due to the site being allocated in a Conservation Area, being next to a Nature Conservation Area, the score reflects the potential uncertain effect of of proposed development on archaeological heritage. Sustainability objective 12: *The built environment and heritage* has a 'uncertain' finding as at present there are no development proposal and there is some uncertainty whether the site will be mix school/ residential or solely residential.

Another sustainability objective that has highlighted an issue is sustainability Objective 8: Flooding – this is mainly due to the site being within a CDA.

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable for the suggested site allocation above. However, environment issues such as conservation and nature conservation areas; archaeological heritage and in addition the flooding are concerns that development proposal must considered, and incorporate sensitive and respectful design, layout and form; and suitable flooding mitigation measures. Site 18: 60 Pitcairn Road, Mitcham CR4 3LL

Site 18: 60 Pitcairn Road, Mitcham CR4 3LL

**Current use:** Vacant (last use small business – approx. 10 years ago)

#### Site Allocation: Residential (C3 Use Class).

Delivery timescale: 2014 – 2019.

Site location: The site has direct access to Pitcairn Road and is within proximity to Streatham Road. The site is in an area with moderate accessibility to public transport services (in a PTAL level 4 area) and is within walking distance of Mitcham town centre. To the rear of the site is a large building in employment use which fronts onto Crusoe Road. Neighbouring and next to the site are residential units (houses - 2 ½ storeys in height). The site is recognised as a designated cycle route. The site is located within Flood Zone 3A.

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**SA: Comments:** The sustainability objectives are favourable for residential site allocation at this location. The only SA objective of some concern is Sustainability Objective 8: Flooding - this is mainly due to the site located within a CDA.

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable for the site allocation highlighted above. It is essential that any development proposal must include within the design and layout suitable flooding mitigation measures as part of the development scheme

Site 20: Wilson Hospital Cranmer Road Mitcham CR4 4LD

**Current use:** Health clinic relating to mental health, drug and early intervention and a GP surgery (use class D1).

**Site Allocation:** The size and location of this site gives it potential for a range of community uses (D1 Use Class) in whole or in part including healthcare and education. If the Local Care Centre is to be located on this site then a healthcare (D1 Use Class) led mixed use scheme that may include some 'residential institution' type accommodation (C2 Use Class) and/or some residential (C3 Use Class).

If the Local Care Centre is to be located at another site then the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class), and/or residential (C3 Use Class).

Delivery timescale: 2019 – 2024.

**Site location:** The site consists of a large part single and part two storey, hospital building fronting Cranmer Road. Along the south-eastern boundary are Caesars Walk and two storey terrace houses. To the south and southwest of the site are Cranmer Primary School and its playing fields. The access road to Cranmer Primary School runs along the northwest boundary with a row of two storey terrace houses beyond. On the opposite side of Cranmer Road is a large open space known as Cranmer Green.

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**SA: Comments:** the sustainability objectives are favourable the listed site allocation highlighted above. However, the SA appraisal demonstrates that there are a number of 'uncertain' objectives; these are mainly environmental objectives.. The status of the building is a Locally Listed building. Part of the site falls within a Conservation Area. Protecting the habitat of the protected species that have been identified on/near the site in past ten years i.e. Common Toads, Smooth Newts and Common Frogs. In addition there is concern with the possible impact of the proposed development to the sites archaeological heritage.

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable for the listed site allocations above. However, it is recommended very strongly that further investigate is carried out on the identified environmental issues and the council seeks advice from the appropriate environmental organisation for example English Heritage and Natural England.

Site 21: Birches Close 1-7 Birches Close Mitcham CR4 4LQ

**Current use:** Specialist health facilities including a polyclinic, day centre and chiropody clinic (Use Class D1) and 8 assisted living units for people with learning disabilities.

**Site Allocation:** The size and location of this site give it potential for a range of community (D1 Use Class) uses in whole or in part including healthcare and education. If the Local Care Centre is to be located on this site then a healthcare (D1 Use Class) led mixed use scheme that may include some 'residential institution' type accommodation (C2 Use Class) and/or some residential (C3 Use Class).

If the Local Care Centre is to be located at another site then the site has potential for community uses including education (D1 Use Class), and/or a nursing home (C2 Use Class) and/or residential (C3 Use Class).

Delivery timescale: 2019 – 2024.

Site Location: The site, which has access from Cricket Green, consists of various single and two storey buildings accommodating specialist NHS clinics and supported accommodation units. To the north, on the opposite side of the footpath, 'Cold Blows' is a three storey office building and three storey blocks of flats. To the east of the site is a single storey nursing home and to the south is a bowling green, the Methodist Church and a row of two storey terrace houses. To the west is a row of two and three storey detached and semi-detached houses.

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**SA: Comments:** the sustainability objectives are favourable for the site allocation. However, the SA appraisal identified an 'uncertain' namely, SA objective 12: *The Built and Heritage Environment* - the uncertainties relate to the site being part of a Conservation Area, being adjacent listed buildings, the unknown impact on proposed development to the archaeological heritage. SA Objective 8: *Flooding* has scored an 'indirect effect' due to the site being part of a CDA.

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable for the listed site allocations above. However, it is recommended that further investigations to be carried out on the identified environmental issues and that the council seeks advice from the appropriate environmental organisation for example English Heritage and Natural England.

Site 22: Patrick Doody, SW19

Current use: Health Centre (D1 Use Class)

**Site Allocation:** A healthcare (D1 Use Class) led mixed use scheme with some residential (C3 Use Class) or solely residential (C3 Use Class) if the community services are discontinued.

Delivery timescale: 2019 – 2024.

The site is located in a predominantly residential location just outside Wimbledon town centre. Adjacent to the site is an electricity substation. The site is surrounded by two-storey houses but on the southern side of Pelham Road are three-storey blocks of flats and to the south a grade II listed building.

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#### SA: Comments:

The sustainability objectives are favourable for health care led mixed development with some residential this is highlighted by the positive scores for a number of social objectives. However, there are a number of sustainability objectives that have *uncertain* effect namely objective 14 *Health and well being* and 15 *poverty and inclusion*. This uncertainty is whether there would be or could be an adverse impact on health care provision, for the local growing population in the area. The health centre runs a number of health services including family planning and the centre is being used temporarily as extra GP consultant room for patient visits for a nearby GP surgery as Dees House (within the Nelson Hospital ground) is being redeveloped.

This uncertainty has an impact on the outcome for sustainability objective 15: *Poverty and equality* this objective aim is to seek to ensure that everyone has access to basic services. However, for the reason highlighted above this is currently uncertain..

#### **Recommendation/conclusion**

Overall, the sustainability objectives are favourable for primarily health care provision with some residential. It is vital that any development proposal should be influenced by the local health care need in the area thus; ensure there is no adverse impact to these vital services. There is a need for the local health body to ensure that that there is no adverse impact to health care provision in the area, bearing in mind the predicted population increases. In addition, any design proposal for the site will need to be sensitive, respectful and enhance the character of the local environment. In addition, the transport and noise issues must be a consideration with any appropriate development proposal and appropriate mitigation measures should be part of any development proposal.

Site 23: Amity Grove, 9 Amity Grove, Raynes Park, SW20 0LQ

Current use: Medical clinic (D1 Use Class).

**Site Allocation:** Community (D1 Use Class) or residential (C3 Use Class) if the community use is provided elsewhere.

Delivery timescale: 2019 – 2024.

The site is located in a predominantly residential location just within the north side of the Raynes Park Town centre boundary. The adjacent residential buildings range from 1 to 3 storeys in height and are located within Raynes Park town centre boundary. The site is within an area with high level of access to public transport accessibility (PTAL 5). Therefore, protecting the residential amenity of those properties adjacent to or in the vicinity of the site, especially considering to potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

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**SA: Comments:** The sustainability objectives support the site allocation above. However, there are a number of sustainability objectives that have 'uncertain effect' namely objective 14 *Health and wellbeing* and 15 *poverty and inclusion* it is uncertain if there could be a potential adverse impact on health care provision for the local growing population in the area. As the site is located within Raynes Park town centre boundary, which is PTAL 5, it is possible that any proposed scheme could be car free which and this would be a positive step in terms of the SA. **Recommendation/conclusion:** Overall, the sustainability objectives supports the site allocation, providing that if the proposed scheme is solely for residential use that the community services are provide elsewhere. Evidence will be required from the NHS that demonstrates that health provision in the area would not be adversely impacted by the loss of these facilities, taking into account the predicted growing population and local health needs.

Site 24: Morden Road Clinic

**Current use:** Medical clinic (D1 Use Class) and retail (pharmacy).

**Site Allocation:** A healthcare (D1 Use Class) led mixed use scheme with some residential (C3 Use Class).

Delivery timescale: 2019 – 2024.

The site consist of a part single and part two-storey building and is surrounded by single and two-storey houses. On the opposite side of Morden Road, which is to the east of the site, is Morden Hall Park a Nation Trust park.

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**SA: Comments:** The sustainability objectives are favourable for health care/community led mixed development with some residential uses; this is highlighted by the positive scores for a number of social objectives. However, Sustainability objective 12 *The built environment and heritage environment* has scored a minor negative effect, this is due to the location of this site which is opposite Morden Hall Park (Registered Historic Park); any development should be designed so as not to have an adverse impact on this park.

Sustainability objective 5: noise has scored uncertain due to the location of the site, , it may be outside of the town centre. However, Morden Road is a heavily used vehicular road especially by HGV lorries passing through the town centre.

**Recommendation/conclusion:** Overall, the sustainability objectives support the site allocation use above. However, it is essential that any development on this site is respectful, sensitive and enhances the local character of the area including the adjacent Morden Hall Park (Registered Historic Park status).. In addition, the healthcare needs of the area should be considered in conjunction with the proposed developments around Morden Station brief and the predicted increases resident population. Any development proposals must incorporate through design, layout and form mitigation measures for noise seek to ensure potential noise from road is minimised.

Site 28:'P4' Land Adj. Wimbledon Theatre, SW19

Current use: Car park (Sui Generis Use Class)

**Site Allocation:** Any of the following or an appropriate mix of town centre type uses such as retail (A1 Use Class), café and restaurants (A3 Use Class), community (D1 Use Class), cultural, leisure and entertainment (D2 Use Class), offices (B1[a] Use Class) and hotel (C1 Use Class). The site may incorporate residential development (C3 Use Class) on upper floors.

The site is within Wimbledon town centre and is adjacent to a Grade II listed building (Wimbledon Theatre). Adjoining the site boundary to the west is Wimbledon Theatre, and adjoining to the south of the site are South Wimbledon Social Club, and offices. Adjacent to the site to the north are mixed use developments; comprising of commercial and residential use. The site is predominately surrounded by buildings ranging in height from two to four storeys.

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**SA: Comments:** The sustainability objective supports the site allocation above for this town centre site. However, sustainability objective 12 *The built and heritage environment* has scored minor negative effect this is due to the unknown effect on the adjacent Grade II listed building (Wimbledon Theatre).

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable for town centre uses including residential providing, the design are respectful and sympathetic to the adjacent Grade II listed building, the local area character and environment. It is imperative that any development proposal enhances the setting of the Grade II listed building.

Site 31: Wimbledon Community Centre, 28 St George Road, Wimbledon SW19 4DP

#### Current use: Vacant – former community centre (D1 Use Class)

**Site Allocation:** Any of the following or an appropriate mix of town centre type uses such as community (D1 Use Class), retail (A1 Use Class), financial and professional services (A2 Use Class), offices (B1[a] Use Class) and residential (C3 Use Class). An alternative option for the site could be a hotel (C1 Use Class).

Delivery timescale: 2014 – 2019.

This site is a two storey flat roofed community centre (D1 under the Use Class Order). It is surrounded to the east by four to five storeys mixed use (commercial / offices) buildings and to the west by four storey offices and to the south by office buildings ranging from five to nine storeys in height. The community centre is located edge of the town centre.

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**SA: Comments:** The sustainability objectives support the site allocation. However, the sustainability objectives 13: *Transport* and 5: *Noise* are uncertain as there is concerns with the preferred option development proposal (including for hotel and community use) As the transport implications are uncertain therefore, the noise objective is also uncertain.

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable to the preferred option.

Site 32 : Wyvern Youth centre Morden SM4

Current use: Vacant – former youth centre. Site Allocation: Residential (C3 Use Class) Delivery timescale: 2014 – 2019.

The site is a 2-3 storey detached building in a residential area. To the east, west and opposite to the south are 2 storey semi-detached houses. To the north are terraced houses. The site is in an area of low accessibility to public transport (PTAL 2). The site is within an Archaeological Priority Zone.

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**SA: Comments:** The sustainability objectives are favourable to the site allocation use. SA objective 12: The built and heritage environment has scored an 'uncertain' effect due to the unknown potential of possible impact of any development on archaeological heritage in the area.

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable to the preferred option providing there is no adverse impact to the local community services.

#### Site 33: Elm Nursery Car Park

**Current use:** Surface Car Park (Sui Generis Use Class) **Site Allocation:** Residential (C3 Use Class)

Neighbouring the site is an occupied commercial unit (A1) and a public access footpath lies between the commercial unit and the car park. Adjacent to the site are residential units (3-4 storey flats). The site is within the Mitcham town centre however; the site is physically separated from Mitcham town centre and is technically edge-of-centre. The site is in an area with moderate accessibility to public transport services (in a PTAL level 4 area) and is accessible from the London Road.

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**SA: Comments:** The sustainability objectives support the site allocation. However, sustainability objective 5: *Noise* has scored 'minor negative' effect this is due to the location of the site edge of the town centre and on being near road which is heavily used by HGV lorries in particular, passing through Mitcham towards Croydon, central London and beyond..

**Recommendation/conclusion:** Overall, the sustainability objectives are favourable towards residential use. In addition, any development proposal should have noise mitigation measures which are both suitable and effective.

Site 35: Mitcham Fire Station

#### Current use: Fire station

**Site Allocation:** A mix of uses which could include any of the following: community uses (D1 Use Class), community uses such as a cinema, gallery, theatre (D2 Use Class), residential (C3 Use Class), restaurant, café (A3 Use Class), office (A2 or B1 Use Class), drinking establishment (A4 Use Class) or non-food retail (A1 Use Class),

The fire station is within a Conservation area and is adjacent to an Archaeological Zone. The station is on an open space green triangle to the north and west with a War memorial. To the south are number significant Listed buildings. To the west of the site is War Memorial made from Portland stone commemorating the first World War. The open space green triangle has busy one way clockwise traffic going around the site and green.

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**SA: Comments:** Overall, the sustainability objectives are favourable to the site allocation. However, sustainability objective 13: *Transport* has scored 'uncertain' this is due to the adverse traffic pressures (including congestion) with the one way system and surrounding main roads leading into the town centre. In addition sustainability objective 12: *the built environment* has also scored uncertain this is due to the location of the site in a conservation area and the Locally Listed building adjacent.

**Recommendation/conclusion:** Overall the sustainability objectives are supportive of appropriate town centre uses. However, it is strongly recommended that any development proposals demonstrate there is no adverse impact on the archaeological heritage, the conservation area (Cricket Green), other green space in the area and other heritage assess (including the War memorial). As part of any development proposal consideration to access to and from the site would need to be addressed and adopt measures that would alleviate this issue. In addition, there would be a need for parking mitigation measure to ensure no adverse pressure to neighbouring roads. It is strongly, recommended that council seek advice from English Heritage and other suitable conservation organisation.

Site 36: Chaucer Centre, SM4

Current use: Training, meeting and conference centre.

**Site Allocation:** Mixed use residential and community (D1 Use Class) or solely residential use (C3 Use Class) subject to the existing training facility being provided on a suitable site elsewhere.

The Chaucer Centre (Merton's Professional Development Centre) is a two storey building. It is a venue for training, meetings and conferences. Adjacent to the site are the Merton Music Foundation school, the Smart Centre which is an education facility and a former nursery school building. The site is mainly surrounded by two storey terraced houses. Portions of the north and west of the site are within a Critical Drainage Area.

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**SA: Comments:** Overall, the sustainability objectives support the site allocation.. SA objective 8: Flooding has scored a 'minor negative effect' due to namely the site being part of a CDA. The other 'unknown effect is 13: Transport – due to the unknown impact of any new proposals compared to the existing activity on site..

**Recommendation/conclusion** Overall, the SA supports the site allocation use – however, any development proposal must consider the traffic use impacts and the CDA issues pertaining to the site and incorporate mitigation measures within the layout, design and form of any proposals.

#### Site 37: Wimbledon Greyhound Stadium, SW19 Site 37: Wimbledon Greyhound Stadium, SW19

**Current use:** Greyhound stadium (D2 Use Class) and car park (Sui Generis Use Class) **Site Allocations:** Intensification of sporting activity (D2 Use Class) with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation. This site must be delivered via a site-specific planning brief (Supplementary Planning Document) to ensure the delivery of sporting intensification and six weeks of community consultation on proposals.

The site is located in the North west of the borough near the boundary with London Borough of Wandsworth. The site is made up of two thirds greyhound racing stadium and the remainder of the site is a car park. Surrounding the site along the northern and eastern boundary the site adjoins an industrial estate. To the south of the site in Merton, at the other side of Plough Lane is an industrial estate. Running along the western boundary of the site is a large electricity substation. The site and its surrounds are within Flood Zone 3b. Most of the site is within a critical drainage area for surface water flooding.

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**SA: Comments:** Overall, the sustainability objectives support the site allocation uses above. However, there are a number of uncertainties against environmental sustainability objectives when measured against the sustainability objectives. The major concern is sustainability objective 8: *Flooding*, the site is within the functional floodplain of the River Wandle (Flood Zone 3b). In addition the site is also within critical drainage areas for surface water flooding. Furthermore, the site is crucial for the delivery of the Wandle Catchment Plan and the proposed Wandle Valley Regional Park. Other environmental uncertainties (which are inter linked) are sustainability objectives 3; Biodiversity, 7: River and water; quality, use and; waste water infrastructure. It is not known how any further development in this sensitive location may have an impact on the environmental features (both physical and natural) and furthermore, the effect along the River Wandle and River Graveny. Sustainability objective 13: *Transport is* another concern although the site is PTAL 3 (moderate) the surrounding areas are PTAL 2 (poor).

**Recommendation/conclusion:** Overall, the sustainability objectives are supportive of site allocation uses. However, it is strongly recommended that any development proposals for this site is done in consultation with the Environment Agency and Natural England thus, ensuring no adverse or increase of risk to flooding (from all sources) and biodiversity in and around the site.

**41**: Kingston Road Opposite Lower Downs (Land Between 424 - 448, Kingston Road, Raynes Park, SW20 8DX

Current use: Vacant land with advertising hoardings.

Site Allocation: Residential (C3 Use Class).

The site is a grassed area with advertising hoardings located on Kingston Road, opposite the junction with Lower Downs Road and Burstow Road, Wimbledon SW20. The site is located in a predominately residential area. Adjacent to the west of the site are two and three storey terraced houses. Adjacent to the north of the site are two storey terraced houses, two of which have ground floor commercial units. Two storey terraced houses are also located adjacent the site to the east. Adjacent to the south of the site is a large industrial premises and also two storey terraced housing.

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**SA: Comments: SA** objectives support the site allocation. However, SA objective 13: Transport has scored a 'minor negative effect'; this is due to the site situated on the inside of a relatively tight corner with two side roads opposite (one of which is a busy through route from Kingston Road into Lower Downs Road which passes through a restricted railway arch). Furthermore, several schools are also situated to the north of the railway arch which contributes to local congestion at peak times. On the south side of the intersection is a signalled pedestrian/cycle crossing which links with a segregated cycle facility along The Chase.

The issue identified above are potential linked to SA objective 5: Noise due to the activity near this site location with traffic.

**Recommendation/conclusion:** Although, the SA supports in principle the site allocation use, there is concern with traffic impact.to the site and surrounding area which needs to be considered as part of any development proposal.

Site 46: The Old lamp Works, 25 High Path, SW19

**Current use:** Office, warehouse and distribution.

Site Allocation: Residential (A1 Use Class) or education (D1 Use Class).

The site is within a scattered employment site predominantly surrounded by residential and other scattered employment uses in South Wimbledon. The site falls within an archaeological priority zone.

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**SA: Comments:** The sustainability objectives are favourable to the site allocation. However, the sustainability objectives for a number of environmental objectives have scored either minor negative impact or uncertain impact.

Sustainability objective 12 *The built and heritage environment*: is an objective that has an uncertain score; it is not known what affect development could have on adjacent archaeological heritage. Furthermore, sustainability objective 8: Flooding scores a 'minor negative'; this is due to flooding issues either on or adjacent to the site. For this site, there are critical drainage problems.

Sustainability objectives 20: *Education and Skills*; and objective 21: *Work and the economy* have two set of scores the minor score are for a solely residential development and the higher 'significant effect' are for if the site is developed solely for education.

**Recommendation/conclusion:** Overall the sustainability objective supports the site allocation although, solely education development scores slightly higher. Any development proposal must through, design and layout include, suitable flooding mitigation measures. In addition proposed developments must be sensitive to the archaeological priority zone and other heritage asset in the area including ancient monuments.

Site 48: Land at Bushey Road, 80-88 Bushey Road Raynes Park SW20 0JH.

Current use: **Section 48a**: Offices (B1[a] Use Class: Apex House, vacant since before 2006), storage and distribution (B8 Use Class: currently occupied by Safestore), light industry (B1[c] Use Class, currently occupied by Racetech).

Section 48b: Offices (B1[a] Use Class: former Thales Avionics, vacant since 2010).

**Site Allocation:** An employment-led mixed use scheme, research and development (B1[b] Use Class), light industrial appropriate in a residential area (B1[c] Use Class) and storage or distribution (B8 Use Classes) that may include an appropriate mix of any of the following: bulky goods retail (A1 Use Class), car show room (sui generis Use Class) and school (D1 Use Class)... The site consists of relatively large scale industrial buildings ranging between two and five storeys in height and open parking areas. To the west is the A3 'Beverley Way' dual carriageway and to the south is Bushey Road (A298). To the east of the site is a "Pets at Home" store and, beyond that, a primary school. To the north, on the opposite side of Bodnant Gardens, are two storey houses.

Sections 48a and 48b are under separate ownership. Section 48a consists of a vacant office 5 storey office toward the southern end (Apex House), a storage and distribution unit (Safestore) located centrally and a light industrial use to the rear (Racetech). Section 48b consists of the vacant art deco former Thales Avionics offices and warehouse, with a separate industrial unit to the rear in the northeast corner.

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**SA: Comments:** The sustainability objectives support the site allocation. However, the sustainability objectives for a number of environmental objectives have scored either 'minor negative impact' or 'uncertain impact'.

Sustainability objective 8 Flooding: that has an uncertain score; it is not known as we do not know the details of development.

Sustainability objective 5: Noise is also an uncertain score due to this section of the A3 being identified as on Department for noise map.

Sustainability objective 12 Transport has scored an uncertain score due to location and possible impact to the traffic movement and congestion to and from the site location.

**Recommendation/conclusion:** Overall the sustainability objective supports the site allocation providing development proposal have appropriate flooding and noise mitigation measures and a transport is provide part of any development proposals.

Site 53: Brook House, 1A Cricket Green, Mitcham CR4 4LA

**Current use**: The site has been vacant since 2008 but the established use is for office B1[a] Use Class). Planning permission (11/P2839) was granted on 16 February 2012 for the change of use of the property to class D1 educational use. This proposal was submitted and obtained by a third party and not on behalf of the owner.

**Site Allocation:** Any of the following uses or a suitable mix of community (including education D1 Use Class), nursing home/care home (C2 Use Class), hotel (C1 Use Class), and/or residential (C3 Use Class).

The site consists of a three storey office building with vehicle access on the western side off Cricket Green and on the eastern side off Chatsworth Place. To the north is a three storey former office building, Mitcham Court, which is currently used as a school and to the east are three storey blocks of flats. To the south of the site, on the opposite side of the footpath (Cold Blows), is a two-storey house that has been converted into a day care nursery and numerous single and two storey buildings accommodating specialist NHS clinics at Birches Close (Site 21).

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**SA: Comments:** The sustainability objectives are favourable for the site allocation listed above. However, the SA appraisal identified an 'uncertain effect' namely, SA objective 12: *The Built and Heritage Environment* - the uncertainties relate to the site being within the Mitcham Cricket Green Conservation Area which is an Archaeological Priority Zone. To the west of Mitcham Cricket Green, the site is designated as Metropolitan Open Land, Open Space, Green Corridor, Green Chain and within in the Wandle Valley Regional Country Park. The footpath ('Cold Blows') along the southern boundary needs to be preserved. 'Mitcham Court', to the north of the site, is a Locally Listed building.

SA objective 8: *Flooding* score a minor negative effect' due to parts of the eastern and western portions of the site are within a Critical Drainage Area.

**Recommendation/conclusion**: Overall, the sustainability objectives are favourable for the listed site allocations.. However, it is recommended that further investigations are carried out on the identified environmental issues highlighted.. It is essential for development to be sensitive and respectful to the character of the character of the area; which can be achieved through design, layout and form of the proposal.

**Site 59:** Corner Baltic Close and High Street Colliers Wood: 194-196 High Street Colliers Wood, Colliers Wood London SW19 2BH

Current use: Informal car park

**Site Allocation:** Any of the following or a suitable mix of retail (A1 Use Class), financial and professional services (A2 Use Class), restaurant or cafes (A3 Use Class), drinking establishments (A4 Use Class), hot food takeaways (A5 Use Class), offices (B1[a] Use Class and residential (C3 Use Class).

Hard standing area neighbouring a public house (Colliers Tup) to the west, a residential block (Oslo Court) to the east and Wandle Park (MOL) to the north. The frontage of the site facing High Street Collier's Wood is adjoined on the eastern side by a small parade of mixed use commercial and residential buildings. The site is within Wandle Valley Conservation Area and within flood zone 2. The area has a good level of public transport provision

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**SA: Comments:** The sustainability objectives are favourable for residential on this town centre site. However, there are a number of uncertain scores for the preferred option proposed for this site. The uncertainties are for a number of environmental objectives. One of the major concerns is related to flooding. The majority of Colliers Wood town centre is within flood zone catchment that runs from the north of the borough through Colliers Wood and to the south east of the borough. Although, the site is within in flood zone 2, it is adjacent to flood zone 3a and 3b flood zones. Therefore, there is uncertainty on what impact residential could have on the flooding issues (including critical drainage issues and surface water) in the town centre.

Other, environmental uncertainties are Climate change, biodiversity, air quality and built and heritage environment objectives. The main issue is the impact residential could have on these issues. As we do not know the design and layout of any devolvement proposals it is not easy to determine the likely impact.

**Recommendation/conclusion:** Overall, the sustainability objectives support site allocation. However, any development proposals would need to include mitigation measure for flooding (from all sources) and the other environmental objectives outlined above. the design and layout proposals would need to be sensitive and respectful to the Conservation area. Site 57: Morden Station office and retail units, Morden, London SM4

**Current use:** Retail units at ground level and offices above.

**Site Allocation:** Upper floors - hotel (C1 Use Class) and/or offices (B1[a]) Use Class). The ground floor is considered suitable for any of the following uses or a

suitable mix of retail (A1 Use Class), financial and professional services (A2 Use Class), restaurant and cafes (A3 Use Class), drinking establishments (A4 Use Class), offices (B1[a] Use Class) and community (D1 Use Class).

The site comprises a four storey building at the entrance of Morden Underground Station. The allocation only refers to the offices and retail units adjacent to and above Morden Station. The ground level station entrance and other buildings directly associated with the functions of the train station are therefore excluded from the site. To the southwest of the site are single storey retail units and to the northeast of the site is a two storey parade of shops with flats and/or offices above. Northwest of the site is the Morden Underground Station with various buildings ranging between one and three storeys in height To the south of the site is the hard standing of the Morden Bus Station, London Road and on the opposite side of London Road are various mixed use three and four storey buildings.

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**SA: Comments:** The sustainability objectives are favourable to site allocation uses,. The SA identified one 'minor effect' SA objective 5: *Noise* – due to the site being located within Morden town centre facing London Road; which is used heavily by vehicular road users including HGV lorries and coaches passing through the town centre. The other potential 'minor effect' is SA objective 12: *the built and heritage environment* - although the site is some distance from the Morden Hall Park, the relationship with Morden Hall park should be a consideration.

**Recommendation/conclusion:** Overall, the sustainability objectives support the site allocation.. However, any development proposal must consider and incorporate noise mitigation within the design, form and layout. In addition, consideration of the design and form of any building would need to consider the possible impact Morden Park and the relationship with existing building adjacent to the site. Site 58: Sainsbury's (Peel House) car park rear of 127 -149 Kenley Morden

Current use: Car park (short/long stay).

**Site Allocation:** Any of the following uses or a suitable mix of retail (A1 Use Class), financial and professional services (A2 Use Class), restaurants or cafes (A3 Use Class), drinking establishments (A4 Use Class), hot food takeaways (A5 Use Class), offices (B1[a] Use Class), residential (C3 Use Class), community (D1), gym or cinema (D2 Use Class).

The site consists of a two storey car park located on land to the rear of 127 149 Kenley Road. Adjacent to the site to the south is a two-storey terrace of mixed commercial and residential properties on London Road. Kenley Road, which is northeast of the site, is predominately made up of two storey terraced housing. Adjacent to the site to the east is a four storey building at 34-44 London Road with a Sainsbury's supermarket at ground level and an educational establishment (Morden College) above. West of the site is Morden Underground Station.

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**SA: Comments:** The sustainability objectives are favourable to the site allocation.. The SA identified one 'minor effect' SA objective 5: Noise – due to the site being located within Morden town centre facing onto the London Road; which is a heavily used vehicular road used by HGV lorries and coaches passing through the town centre. The other potential 'minor effect' is SA objective 12: the built and heritage environment, although the site is some distance from the Morden Hall Park, the relationship with Morden Hall park should be a consideration.

**Recommendation/conclusion:** Overall, the sustainability objectives support the site allocation uses.. However, any development proposal must consider and incorporate noise mitigation within the design, form and layout. In addition, consideration to the impact of the design and form to Morden Park and the relationship with existing building adjacent to the site. As this site is part of the moreMorden regeneration plan any development proposals should be done in consideration with sites: 57, 58, 61 and 65. Furthermore, a sustainability appraisal for the moreMorden development proposals should be carried out to ensure there is no environmental, social and economic impact to the community.

Site 60: York Close car park, Adj no. 18 York Close, Morden SM4 5HW

Current use: surface car park (sui generis Use Class)

Site Allocation: Residential (C3 Use Class)

This site is a pay-and-display car park which is predominately used by London Borough of Merton staff. Adjoining the west of the site is York Close and Morden Court which are characterised by residential two storey semi-detached and terraced housing. The Morden underground railway depot adjoins the east of the site

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**SA: Comments:** The sustainability objectives are supportive of the site allocation use due to its location within Morden town centre. However there are a number of 'minor negative effects' identified within the SA, namely SA objective 5: noise and 8 flooding.

Sustainability objective 8 flooding – due to the surface water flooding nearby the site. Could residential have an adverse impact and possibly increase the surface water?

When we look at sustainability objective 5 Noise the concern here is due to the site location. The site runs along side the Morden underground rail line and underground depot due to Morden being an end of line stop.

**Recommendation/conclusion**: Overall, the sustainability objectives support this type of development. However, any proposed development proposals would need to have mitigation measure for flooding (from all sources) and noise to ensure that any development minimises noise level to and from the development. As this site is part of the moreMorden regeneration plan any development proposals should be done in consideration with sites: 57, 58, 61 and 65.

Site 61: Morden station car park Kenley Road, SW19 3DP

Current use: Car parking for Morden Underground Station staff and commuters

**Site Allocation**: Any of the following uses or a suitable mix of residential (C3 Use Class),employment (B1[a], B1[b], B1[c] Use Classes) and community (D1 Use Class).

This site is predominately used as a car park. To the west of the site is York Close and Morden Court which are characterised by residential two storey semi-detached and terraced housing. Morden underground railway depot adjoins the east of the site. The site is within an area with a good level of access to public transport accessibility (PTAL 5). A small part of the site, at the north-eastern boundary, is within a Critical Drainage Area

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**SA: Comments:** The sustainability objectives support the site allocation uses above. However, SA objective 12: The built environment and heritage environment is identified as a 'minor negative'. This is due mainly to the site location facing onto a road that is predominantly residential.

**Recommendation/conclusion**: Overall, the sustainability objectives support the site allocation however, future proposals needs to be designed sensitively and respectfully to However, to the residential properties within Kenley road. As this site is part of the moreMorden regeneration plan any development proposals should be done in consideration with sites: 57, 58, 60 and 65.

**Site 62:** 165-171 The Broadway, Wimbledon YMCA. 196-200 and 220-224 The Broadway, Wimbledon SW19 1NE

Current use: Retail, commercial and office uses

**Site Allocation:** A suitable mix of retail (A1 Use Class), financial & professional services (A2 Use Class), restaurants & cafes (A3 Use Class), drinking establishments (A4 Use Class), hot food takeaways (A5 Use Class), offices (B1[a] Use Class), community (D1 Use Class), sporting/leisure use (D2 Use Class) and residential Uses (including hotel) (C3 & C1 Use Class)

The site is located within Wimbledon town centre and is adjoining and adjacent to mixed development (commercial, offices and residential). The site is a mix of uses, offices and commercial uses. The site is in an area with high accessibility to public transport services (in a PTAL 6a).

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**SA: Comments:** The sustainability objectives support the site allocation above. Although, there is one minor negative effect for sustainability objective 12 the built heritage and environment. The chief reason for this outcome is due to the conservation areas and to a lesser degree the vicinity of Wimbledon Theatre (Grade II listed building). At this time we do not know the design and layout proposed for this site, for example, the proposed height of the building(s), the number of units and the type of development. It is not possible assess any possible impact on the environment and local character to the area, including surrounding and existing buildings without further details on design and form of development.

**Recommendation/conclusion:** Overall, the sustainability objectives support the site allocation. Any proposed development proposals would need to ensure the design and layout results in a development proposal that is respectful to the local environment.

Site 63: 165-171 The Broadway Wimbledon, Highland House, Wimbledon SW19

Current use: Retail, commercial and office uses

**Site Allocation:** A suitable mix of retail (A1 Use Class), financial & professional services (A2 Use Class), restaurants & cafes (A3 Use Class), drinking establishments (A4 Use Class), hot food takeaways (A5 Use Class), offices (B1[a] Use Class), community (D1 Use Class), sporting/leisure use (D2 Use Class) and residential Uses (including hotel) (C3 & C1 Use Class)

The site is located within Wimbledon town centre and is adjoining and adjacent to mixed development (commercial, offices and residential). The site is a mix of uses, offices and commercial uses. The site is in an area with high accessibility to public transport services (in a PTAL 6a).

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**SA: Comments:** The sustainability objectives support the site allocation above. Although, there is one minor negative effect for sustainability objective 12 the built heritage and environment. The chief reason for this outcome is due to the conservation areas and to a lesser degree the vicinity of Wimbledon Theatre (Grade II listed building). At this time we do not know the design and layout proposed for this site, for example, the proposed height of the building(s), the number of units and the type of development. It is not possible to assess any possible impact on the environment and local character to the area, including surrounding and existing buildings without further information on design of development.

**Recommendation/conclusion:** Overall, the sustainability objectives support the site allocation. Any proposed development proposals would need to ensure, through design and layout, a building that is respectful to the local environment.

Site 64: 12a Ravensbury Terrace, Wimbledon SW18 4RL

**Current use:** Office and vacant warehouse use **Site Allocation:** Office and residential.

The site is situated toward the northern borough boundary adjoining the London Borough of Wandsworth and is adjacent to the River Wandle and to the railway line to the east. Immediately to the south of the site is 12 Ravensbury Terrace is a three storey building which has recently been renovated and is occupied by creative businesses (which includes an architecture firm). Further south is a neighbouring site proposal, Haslemere industrial area at 20 Ravensbury Terrace. The site is within 5mins walk to Earlsfield station which is situated less than 400m north-east of the site. West of the site is predominantly small residential terraces. To the east of the site is the River Wandle and railway.

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**SA: Comments:** The sustainability objectives are very favourable for the site allocation.. Although, there are a number of either 'minor negative effects' or 'uncertain scores'; there are a number of uncertain outcomes for a number of environment objectives which are strongly linked such as the river water quality and resource and flooding. Sustainability objective 8: *flooding* outcome is uncertain due to this site and surrounding area being within the functional floodplain of the River Wandle (Flood zone 3b).

**Recommendation/conclusion:** Overall, the sustainability objectives are supportive of this sites allocated uses. However, flood risk mitigation measures must be part of any development proposal. It is crucial that any development here does not adversely affect the River Wandle (quality or levels) or increases the risk of flooding from and to the development and to other existing building (residential and commercial) in the area.

Site 65: Kenley Road Car Park, adjacent Kendor Gardens, Merton Park SW19 3HZ

Current use: Commuter car park (Sui Generis Use Class)

#### Site Allocation: Residential

This site is a pay and display car park with approximately 120 vehicle spaces, which are predominately used by commuters utilising Morden Tube Station. The site is generally rectangular in shape. To the immediate west of the site is a linear park above the northern line tube, to the north and east are 2 storey residential terraces, and to the immediate south is a three storey residential apartment building. The surrounds of the site can be generally characterised as residential

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SA: Comments: The sustainability objectives are favourable towards the site allocation...

**Recommendation/conclusion**: Overall, the sustainability objective supports the site allocation. Any development proposals would need to ensure, through design, form and layout, be respectful and sympathetic to the character of the surrounding area. As this site is part of the moreMorden regeneration plan any development proposals should be done in consideration with sites: 57, 58, 60 and 61. Site 69: Sibthorp Road Car Park Car Park, Sibthorp Road, Mitcham, CR4 3NN

Current use: Commuter Car Park (Sui Generis Use Class)

Site Allocation: Town centre type uses and residential

The site is an irregular quadrant shape, is adjacent a busy main road and is occupied by parking spaces for approximately 50 vehicles, redundant public

conveniences and a community recycling area. Access to the site is via an entry from Holborn Way at the northeast boundary with egress along the southwest boundary. There are two points of pedestrian access to the site from London Road via Sibthorp Road and from the Mitcham Fair Green via a passage adjacent the King's Arms Pub. The site is surrounded by business uses which generally address the pedestrianised section of London Road to the east or Upper Green West to the south, however there are also several businesses which have shop fronts orientated toward the car park. To the west of the site on the opposite side of Holborn Road are large four to five storey residential apartment buildings at Sadlers Close.

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**SA: Comments**: The sustainability objectives are favourable for the site allocation above due to its location within Mitcham town centre. However, there are a number of 'uncertain effects', which are mainly linked to objectives relating to transport and other environmental SA objectives:

- SA objective 13: Transport heavy vehicular traffic route along Holborn Way.
- SA Objective 12: The built and heritage environment the site is located within an Archaeological Priority Zone and the wider setting of a grade I listed building (Eagle House).
- SA Objective 8: Flooding the south east of the site is susceptible to surface water flooding.

**Recommendation/conclusion**: Overall, the sustainability objectives are favourable to the site allocation highlighted above. However, it is strongly recommended that any development proposals must consider all the built and heritage environment issues highlighted by; adopting sensitive and respectful design, layout and form and seek to enhance the character and views into and form neighbouring Mitcham Fair Green. In addition, suitable flooding mitigation measure must be incorporated with development proposals

Site 70: Haslemere Industrial Estate, 20 Ravensbury Terrace, Wimbledon Park SW18 4RL

## Current use: Business and industrial

Site Allocation: Business/light industrial (B1) or a suitable employment led redevelopment.

The site is situated toward the northern borough boundary with Wandsworth and is adjacent to the River Wandle and to the railway line to the east. The site has a mixture of purpose built industrial units and provides vehicular access to the adjoining Rufus Business Estate to the south. The site is within 5mins walk to Earlsfield station which is situated less than 400m north east of the site. Immediately to the north of the site is 12 Ravensbury Terrace, a three storey building which has recently been renovated and is occupied by creative businesses which include an architecture firm. Further north is a neighbouring site proposal, 12A Ravensbury Terrace. West of the site is predominantly small residential terraces. To the east of the site is the River Wandle and railway.

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**SA: Comments:** The sustainability objectives are very favourable for site allocation above. There are a number of 'uncertain effects' outcomes for a number of environment objectives which are strongly linked namely River water quality and resource and flooding.

Sustainability objective 8: *flooding* outcome is uncertain due to this site and surrounding area being within the functional floodplain of the River Wandle (Flood zone 3b) again this is regarding to the residential element of the preferred option.

With sustainability objective 13: *transport* the uncertainty here is we do not know details of any development proposal.

**Recommendation/conclusion:** Overall, the sustainability objectives support the sites allocation. However, there is a strong need through design, form and layout for flooding mitigation measures as part of any development proposal. Development must not adversely affect the River Wandle (quality or levels) or increase the risk of flooding from and to the development and crucially to other existing building (residential and commercial) in the area. Site 74: Southey Bowling Club, 559 Kingston Road, Raynes Park, SW20 8SF

Current use: Bowls club

Site Allocation: Bowls club, residential and open space.

The site whilst irregular in shape is well proportioned. It is currently occupied by a bowling green with associated single storey timber structures to the east of the site. The western part of the site is occupied by an open hard standing car park for approximately 35 cars. A single storey brick clubhouse lies in the westernmost corner of the site. Vehicular access to the site is via a long narrow driveway entry from Lower Downs Road. The gardens of two storey residential developments surround the site on all sides.

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**SA: Comments:** The sustainability objectives supportive of the site allocation. The SA did not identify any negative effects (minor or significant).

**Recommendation/conclusion:** Overall, the sustainability objectives supports the site allocation. This SA strongly recommends that the bowling green is not built on as it is designated open space.

Site 75: Former Mitcham Gasworks, 49 Seagas House, Western Road, Mitcham CR4 3ED.

**Current use:** Vacant. Last used as regional offices for the National Grid. The adjacent site has full planning permission for a major residential scheme.

**Site Allocation:** Residential led redevelopment with open space and some community use (e.g. crèche, healthcare). If the gasholder is decommissioned, it is recommended that site redevelopment is taken forward through the preparation of a planning brief (supplementary planning document) to clarify the proposed uses, address the layout, design, essential infrastructure requirements (including school places) and deliverability taking into account the unique issues associated with this site.

**Site location**: The site has been cleared with the exception of a large gas holder in the northern corner of the site. Access to the site is via a driveway entrance from Western Road, a reasonably busy road which connects the site with Mitcham town centre. To the north of the site is a recently completed supermarket, to the west and east are two storey residential dwellings, whilst to the south is the excluded part of the gasholder site beyond which are three storey residential apartment buildings and a medical centre.

## Sustainability Objectives:

**SA: Comments:** This site has not been appraised. This SA supports that the development of this site be taken forward as a planning brief and a full SA be carried out. The planning brief must outline the proposed use, layout, design, essential infrastructure and deliverability taken into account the unique issues associated (former use) with this site.

Site 77: Raynes Park Service Station, 26 Bushey Road, Raynes Park SW20 8LW

# **Current use:** Vehicle repair, maintenance, sales and valet **Site Allocation::** Residential

The site is long and narrow, with a single point of entry from Bushey Road. The site contains a disused service station toward the Bushey Road entrance which is currently being utilised as a hand car wash. The site is generally surrounded on both eastern and western boundaries by the rear gardens of two storey residential properties. To the north of the site is a long narrow warehouse utilised as an image processing and data storage facility accessed via Kingston Road. To the south of the site on the opposite side of Bushey Road are a place of worship, and a parade of retail shops with residential dwellings above.

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**SA: Comments:** The sustainability objectives are favourable towards the site allocation. However, there are a number of minor negative effect and uncertain scores for the preferred option.

Sustainability objective 8 *flooding* is one of the objectives with a 'minor negative effects' due to the sites location. Although, this section of Kingston Road is not susceptible to surface water flooding, it is adjacent to parts of Kingston Road that are susceptible. The development should provide opportunity to improve local surface water drainage

With sustainability objective 5: noise the concern here is the potential noise levels from Bushey Road.

With sustainability objective 13: *transport* has also scored a 'minor negative effect' due to the site location in an area with a poor - medium level of public transport access.

In addition, sustainability objective 5: noise has scored a minor negative effect again due to the site location on a very busy and heavily used strategic road (Bushey Road).

**Recommendation/conclusion:** Overall, the sustainability objective supports the site allocation. However, any development proposal for this site must through design, form and layout have mitigation measures for noise to ensure the traffic noise is minimised for any residential development. In addition, flooding issues in the area needs to be a consideration to any proposal and appropriate measures must be part of the design, form and layout.

#### Site 78: 191-193 Western Road, Mitcham CR4 3ED

## **Current use:** Factory and Open Storage.

Site Allocation: Residential

The site is situated on the southern side of Western Road, which is a busy arterial thoroughfare. The site is currently occupied by a warehouse building and hard-standing parking area. Sole access to the open yard adjoining the west of the site is through the site. The subject site is surrounded by two storey residential properties to the south, east and west and also provides access to an adjacent open yard business to the south west. To the north of the site on the opposite side of Western Road is a scattered large industrial site occupied by Blackout, a blinds and rigging company.

	Sustainability Objectives:																			
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**SA: Comments:** The sustainability objectives are favourable for the site allocation. However, there are a number of minor negative effect and uncertain scores for the preferred option. If we look first at the minor negative effects:

Sustainability objective 5*: noise* score is mainly due to the sites location; Western Road is a heavily used and narrow road which is by all modes including HGV lorries passing through the borough. This issue has had some influence on the sustainability objective 9: *air quality* outcome.

A major concern for this site is flooding, as highlighted in sustainability objective 8: *flooding* with a minor negative effect primarily due to the site being within flood zone 2 and the entire areas being with in a critical drainage area.

**Recommendation/conclusion:** Overall, the sustainability objectives support the site allocation. However, any development proposal for this site must, through design form and layout have the following mitigation measures; for noise to ensure it is minimised to the development, for flooding to ensure any development is not at risk from flooding and does not increase the existing risk to surrounding area. Development proposal must consider the transport implications to the site and seek to ensure that there is no adverse transport, climate change and air quality impact. Site 80: Crusoe Road Industrial Buildings, 445a and b Crusoe Road, Mitcham CR4 3LJ

Current use: Light industrial

Site Allocation: Residential (C3 Use Class)

The site is occupied by single storey commercial buildings, and has small concrete forecourt which is informally utilised for loading and parking associated with the businesses. The adjoining site to the west contains a vacant two storey industrial building (neighbouring site proposal 18), whilst the general character of the surrounding area comprises standard two storey residential terraces.

	Sustainability Objectives:																			
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**SA: Comments:** The sustainability objectives are favourable for the site allocation use. **Recommendation/conclusion:** Overall, the sustainability objectives is supportive of the site allocation...

## Evaluating the effects of the Local Plan

- 20.1 The appraisal summarised indicates predominantly positive impacts arising from the site allocations approach and the sites which have been selected for inclusion in the document. This can be attributed to the Sites & Policies Plan and Polices Map relationship with the Core Planning Strategy, the preparation of which has also been informed by higher-level sustainability appraisal.
- 20.2 The site-specific elements of the appraisal are based on the approach set out for each of the sites, however this is limited by the general nature of these uses, especially open space sites, that have sought to avoid being excessively prescriptive. Therefore, sustainability issues such as the detailed design of developments and their environmental performance have not been considered as this is beyond the scope of this element of the local plan.
- 20.3 Although, it is recognised that such aspects may have a significant bearing on the eventual sustainability outcomes of individual developments, these issues would be considered following submission of individual planning applications and assessed against the relevant policy framework, which will have been appraised for sustainability.
- 20.4 Where possible constraints and negative effects are identified, it provides the opportunity to consider how these might be mitigated. While some of the sites have been identified as having potential negative impacts with particular sustainability objectives, this does not mean that overall the allocation of these sites is 'unsustainable'. In some cases measures could be implemented to mitigate potential adverse outcomes and these can be addressed through the development management process.

## 21 Consulting on Sites & Polices and Polices Map

- 21.1 Merton Sites & Policies Plan and Policies Map was started in July 2011 and since then has been through three stages of public consultation over a total of more than eight months:
  - July September 2011 Stage 1 Call for sites to encourage respondents to submit sites for potential redevelopment, issues to be considered for new detailed planning policies and potential land designations on the Proposals Map.
  - January-May 2012 Stage 2 Preferred options for approximately 20 detailed planning policies (really only 20 policies?), approximately 50 potential sites and Proposals Map changes.
  - June-July 2012 Stage 2a Preferred options continued for an additional 15 sites suggested at Stage 2, three detailed planning policies and some Proposals Map amendments.
  - Jan Feb 2013 Stage 3 Towards a final plan following changes to national and regional planning systems, local research and responses from previous public consultations; a further public consultation was held on the document.

## **Consultation Arrangements on the Sustainability Appraisal**

- 21.2 The consultation arrangements for this SA report and Sites and Polices Plan and Proposal map preferred options are in line with Merton Council's Statement of Community Involvement (SCI). These can be viewed on Merton council's website here: www.merton.gov.uk/planning/planningpolicy
- 21.3 In accordance, with the SEA Regulations copies of this report have been sent to the following environmental bodies:

## Environment Agency

Planning liaison team, South East Area Eastbury House 30-34, Albert Embankment London SE1 7TL

## **English Heritage**

London Region 1 Waterhouse Square 138-142 Holborn London EC1N 2ST

## **Natural England**

Planning Liaison Team South East Regional Office Portland House Stag Place London SW1E 5RS

## 22 Conclusion

- 22.1 As part of the sustainability appraisal it is required to identify key sustainability issues. The Sites & Policies Plan and Policies Map have the opportunity to take forward area specific proposals in a manner that maximises the benefits to sustainability and avoids adverse impacts.
- 22.2 The areas selected as the focus for economic growth and stability is inherently the most sustainable, based on a network of centres being well connected by public transport that supports sustainable modes of travel.
- 22.3 However, it is essential that a balance is always sought with housing, employment, leisure and community activities, including open space and the natural environment.
- 22.4 Crucially, this balance must be appropriate to reinforce sustainability and improve quality of life. All redevelopment and development proposals must, take the opportunity to improve the physical environment and minimise the risks associated with a changing climate.
- 22.5 Issues such as flooding from all sources, poverty (income and fuel), community, social provision and health provision are areas of concern within the borough, although mainly in the east of the borough where there are pockets of deprivation. Therefore, it is essential that any potential development address these issues.