

Merton's Local Plan 2021

Sustainability Appraisal (SA) incorporating Strategic  
Environmental Assessment (SEA)

**Pre submission**

July 2021

# Non-technical summary

## ***Purpose of sustainability appraisal***

- I. This is the Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA) for Merton's draft proposed submission Local Plan (stage 3), Environment Report. The timetable for the Local Plan towards adoption can be found in figure 3 This report is stages C1 and D1-D2 of the SEA/SA process (see figure 1)
  
- II. SEA Regulations 2004 Schedule 2 (6) states that:  
*The likely significant effects on the environment, including short, medium- and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as:*
  - a) Biodiversity.
  - b) Population.
  - c) Human health.
  - d) Fauna.
  - e) Flora.
  - f) Soil.
  - g) Water.
  - h) Air.
  - i) Climatic factors.
  - j) Material assets.
  - k) Cultural heritage, including architectural and archaeological heritage.
  - l) Landscape; and
  - m) The inter-relationship between the issues
  
- III. The purpose of Merton's Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating *social, economic, and environmental* considerations into the preparation of new or revised plans and strategies. It is imperative to begin the SA/SEA at the first stages of plan making to find the key sustainability issues that are affected by the implementation of the plan; it helps with creating development options and assesses any significant effects of the proposed development. SA/SEA's are a valuable tool for developing sound planning policies and planning development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.

## The SEA processes

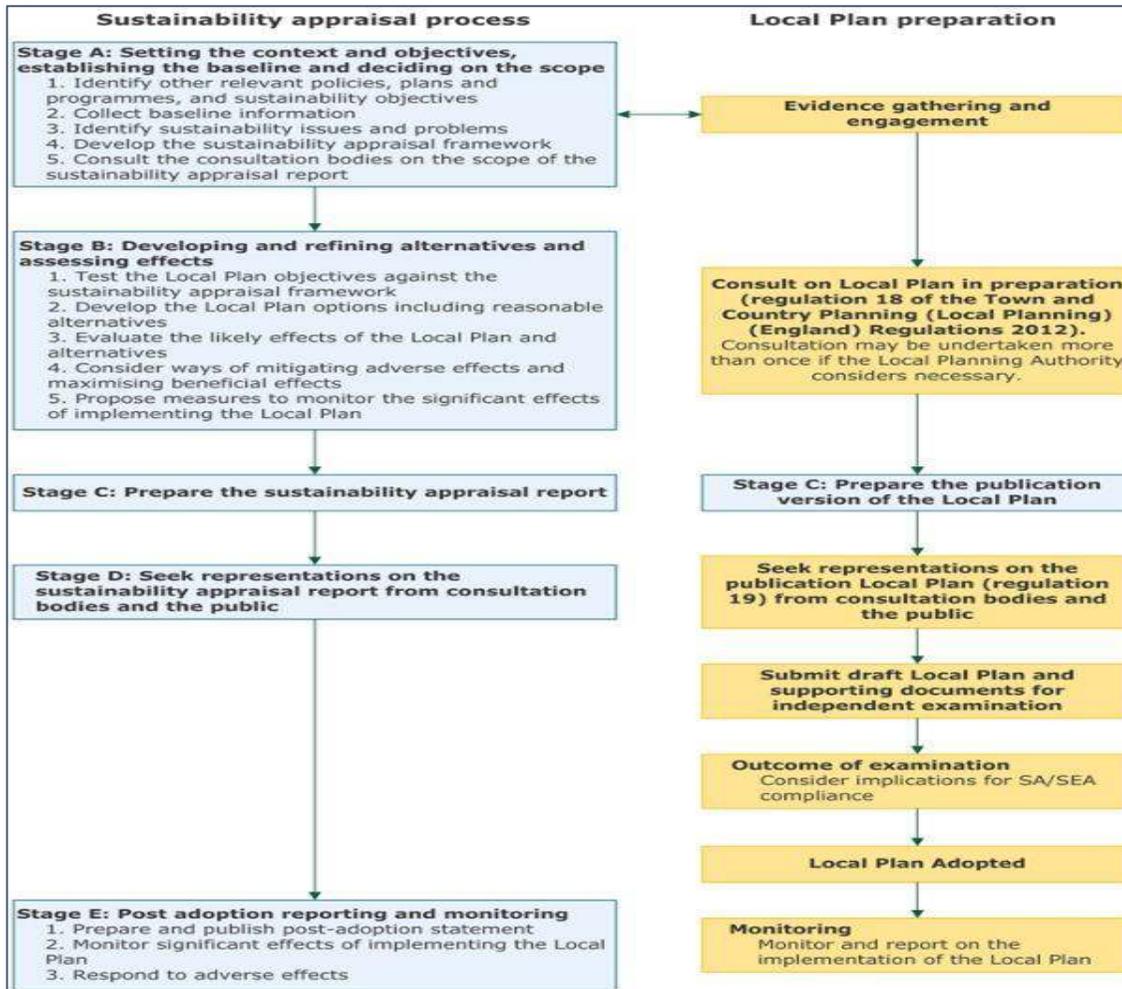
- IV. The SEA is an iterative process informing each consultation stage of the Local Plan's development. The aim of the SEA is to decide which impacts are likely to be significant and therefore, what the assessment should concentrate on. This has been achieved by the selection of SEA objectives and indicators which will be used to measure the impact of the plan.

Figure 1: Stages in the SEA process

SEA stages and tasks	Purpose
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.	
Identifying other relevant plans, programmes and environmental protection objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed, and to help to identify SEA objectives.
Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects, and monitoring; to help in the development of SEA objectives.
Identifying environmental problems	To help focus the SEA and streamline the later stages, including baseline information analysis, setting of the SEA objectives, prediction of effects and monitoring.
Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.
Consulting on the scope of SEA	To ensure that the SEA covers the likely significant environmental effects of the plan or
Stage B: Developing and refining alternatives and assessing effects.	
Testing the plan or programme objectives against the SEA objectives	To identify potential synergies or inconsistencies between the objectives of the plan or programme and the SEA objectives and help in developing alternatives.
Developing strategic alternatives	To develop and refine strategic alternatives.
Predicting the effects of the plan or programme, including alternatives	To predict the significant environmental effects of the plan or programme and alternatives.

Evaluating the effects of the plan or programme, including alternatives	To evaluate the predicted effects of the plan or programme and its alternatives and assist in the refinement of the plan or programme.
Mitigating adverse effects	To ensure that adverse effects are identified and potential mitigation measures are considered.
Proposing measures to monitor the environmental effects of plan or programme implementation.	To detail the means by which the environmental performance of the plan or programme can be assessed.
<b>Stage C: Preparing the Environmental Report</b>	
Preparing the Environmental Report	To present the predicted environmental effects of the plan or programme, including alternatives, in a form suitable for public consultation and use by decision-makers.
<b>Stage D: Consulting on the draft plan or programme and the Environmental Report</b>	
Consulting the public and Consultation Bodies on the draft plan or programme and the Environmental Report	To give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the Environmental Report and to use it as a reference point in commenting on the plan or programme. To gather more information through the opinions and concerns of the public.
Assessing significant changes	To ensure that the environmental implications of any significant changes to the draft plan or programme at this stage are assessed and considered.
Making decisions and providing information	To provide information on how the Environmental Report and consultees' opinions were considered in deciding the final form of the plan or programme to be adopted.
<b>Stage E: Monitoring the significant effects of implementing the plan or programme on the environment.</b>	
Developing aims and methods for monitoring.	To track the environmental effects of the plan or programme to show whether they are as predicted; to help identify adverse effects.
Responding to adverse effects	To prepare for appropriate responses where adverse effects are identified.

Figure 2: Sustainability Appraisal process and Local Plan preparation



- V. The [National Planning Practice Guidance \(PPG\)](#) states that:  
*The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.*

- VI. Figure 3 sets out the key outputs of the SA process in relation to the new Local Plan in terms of the expected timescale for the preparation of SA Reports for public consultation.

Figure 3: Key Outputs of the SA process

Stage of the plan	Key Appraisal Outputs (publication of SA Reports)	Timescale
Evidence Gathering	SA Scoping Report: SA Tasks A1-A5	2018-2021
Consultation on Issues and Options	SA Report on Issues & Options: SA Tasks B1-B6	Stage 2: November 2018-January 2019 Stage 2a: November 2020-February 2021
Pre-submission publication of draft Local Plan: Proposed Submission	SA Report on Pre- Submission: SA Tasks C1 and D1-D2	Subject to councillor decision June and July 2021, (circa July-September 2021 for six weeks)
Submission of draft Local Plan incorporating minor changes to the Secretary of State	SA Report on Submission Draft incorporating minor changes: SA Tasks C1 and D1-D2	TBC
Examination-in-Public	TBC: SA Tasks C1 and D1-D2	TBC
Inspector's report	TBC: SA Tasks C1 and D1-D2	TBC
Adoption of Local Plan incorporating modifications	SA Report on modifications arising from Inspector's Report SA Task D3	TBC
Post-adoption	TBC: SA Tasks E1 and E2	TBC

## What is the new Local Plan?

- VII. Merton has many assets, including superb transport links, beautiful open green spaces, heritage buildings, and a lively business sector. The new Local Plan will provide a sound basis for planning decisions. We know how important good planning decisions are for Merton residents, as they impact on the appearance of the local environment and how people use it. At the same time, it is in the interest of all who live and work in Merton to attract new talent and new business to enhance the borough's resilience to external change, sustain a buoyant long-term economy and ensure a quality-built environment for generations to come.
- VIII. The new Local Plan is designed to help guide how the borough develops over time and create a vision that enables the council to successfully and responsibly manage growth, while always ensuring the best interests of the borough, its residents and businesses. Merton is rich in assets and the opportunities they inevitably create. It is a place ripe for sustained economic success, and the Local Plan will mean that for years to come there will be a sound and consistent approach to ensuring a bright future for the borough and all who live and work here.

Figure 4: Local Plan timetable

Stages	Dates
Call for sites	October 2017- January 2018
Draft Local Plan (stage 2)	October 2018 – January 2019
Draft Local Plan (stage 2a)	November 2020- February 2021
Publication of pre-submission	Summer 2021
Public enquiry	Autumn 2021
Adoption	Winter 2021/22

Figure 5: Measuring the likely impact of no local plan

Topic area	Sustainability issue(s)	Likely impact in the absence of a Local Plan
Air quality	<p>High levels of NO<sub>x</sub> (nitrogen oxides), PM<sub>10</sub>, and PM<sub>25</sub> emissions from road traffic.</p> <p>London is not meeting legal value for NO<sub>2</sub>.</p> <p>Exposure to poor air quality is unequal across the borough and some parts of the borough more exposed to air quality.</p>	<p>With no additional measures to tackle air quality, London will continue to be non-compliant with EU legal limits, with higher levels of exposure to harmful pollutants.</p> <p>Increasing economic growth and development will lead to increased emissions from construction, buildings car uses and congestion leading to localised air quality issues in Merton.</p>
Climate change	<p>Transport is likely to continue to contribute to CO<sub>2</sub> emissions.</p> <p>CO<sub>2</sub> emissions from buildings likely to continue to rise.</p> <p>Increase in extreme weather events such as flooding, drought, heat exposure and associated adverse health risks to population and potentially pressures to health services.</p> <p>Growing ageing population and increase in children may lead increase in vulnerable population.</p> <p>Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect.</p>	<p>Climate change effects will continue to increase and occur more often, such as increased temperatures, droughts, severe storms and other extreme weather events and flooding seen in the recent years.</p>
Energy use and supply	<p>Insufficient low carbon energy supply.</p> <p>High number of Merton residents living in fuel poverty.</p>	<p>Without additional measures energy use is likely to increase having an adverse impact to in creating a more sustainable borough.</p>
Water recourse and	<p>Need to reduce water usage and consumption per capita.</p>	<p>Increase demand for water and deterioration of water</p>

quality		quality.
Flood risk	<p>Risk of flooding to property and people from river, surface water, sewer, groundwater and reservoir.</p> <p>Increase in run-off, potential contamination and disruption of flows.</p>	Without additional measure to prevent development in areas of flood risk and mitigate against increasing flood risk, the number of people/properties at risk will increase.
Nature environment (Biodiversity/open space).	<p>The loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development.</p> <p>Impact of climate change and threat of new pest and diseases.</p> <p>Poor connectivity to green infrastructure.</p>	The increase of development pressure will reduce the amount of green space and reduce the quality of existing green spaces with no funding or investment.
Historic Environment (Heritage, architectural and archaeological heritage)	<p>Heritage assets at risk from neglect, decay, inappropriate development and air pollution.</p> <p>Pressure of development on the settings and surrounding area of heritage assets.</p>	Heritage assets likely to be protect by way of legislation, however the environment will continue to be most at risk from increased pressure development.
Design	<p>Poor quality public realm</p> <p>Poor design of the built environment, not adopting an inclusive design approach from the outset.</p> <p>Risk of poor design, lack of legible neighbourhoods and sense of place.</p>	Design challenges for Merton's built and natural environments may not be consistently addressed.
	<p>Non efficient use of land.</p> <p>Lack of land for housing development to meet Merton's housing needs.</p>	Pressures from development and competition between the types of development uses will increase, which may lead to unsustainable patterns.

Sustainable land use	<p>Higher density development.</p> <p>Competing pressures for land will impact on the ability to provide social infrastructure and green infrastructure.</p> <p>Integration of land use and transport.</p>	
Soil and geology	<p>Threat to geodiversity because of increased demand for development.</p> <p>Remediation of contaminated land</p>	<p>Greater impact on geology and soils from development.</p> <p>Innovative solutions to reduce the impact of the cost of remediation are also needed.</p>
Noise	<p>Increased noise from night-time economy, freight movement and deliveries associated with mixed used developments.</p>	<p>Likely increase of the population exposed to noise and noise related activities.</p>
Demographic change	<p>Increase in Merton's population.</p> <p>Growing ageing and diverse populations.</p> <p>Uncertainty of the composition of the population, including migration patterns.</p>	<p>Such increases in population likely to lead to increased pressure and competition for land for different types of development.</p>
Social Integration	<p>Increased aging population</p> <p>Remaining causes of multiple deprivation.</p> <p>Ageing population may lead to more isolation.</p> <p>Lack of cohesion.</p> <p>Risk of poor design, a lack of legible neighbourhoods and a sense of place.</p>	<p>Benefits /dis-benefits of growth are likely to affect groups of people differently, especially vulnerable communities.</p>

<p>Health and health inequalities</p>	<p>Increased health inequalities across the borough, especially wards in the east of the borough.</p> <p>Increase pressures on the health service and service provisions.</p> <p>Differences in life expectancy in east of the borough and diverse communities.</p> <p>Widening social inequalities.</p> <p>Low levels of physical activities in children and adults and some diverse communities.</p> <p>Increasing child obesity</p>	<p>Obesity is a growing problem in Merton; problem is significantly worrying in the east of the borough.</p> <p>Increased pressures on the health sector to deal with complex health needs.</p>
<p>Crime and safety</p>	<p>Perception of lack of safety.</p> <p>Fear of crime is creating a barrier to activities for some communities.</p> <p>Vulnerability of different groups (for ethnic minority groups and Protected characteristic groups).</p> <p>More vibrant night-time economy may lead to an increased fear of crime.</p>	<p>Social isolation of some groups is likely to increase as their fear of crime or anti-social behaviour will make them more reluctant to go out and use facilities, services including libraries, shops, green spaces or use public transport.</p>
<p>Housing</p>	<p>Lack of affordable housing</p> <p>Lack of housing meeting local needs/under supply</p> <p>Increase in homelessness.</p>	<p>Challenges to meet housing demands in Merton (including requirements size, type tenure) are likely to increase.</p>
	<p>Variations in educational achievement and attainment across</p>	<p>Inability to access high paid jobs may have a significant</p>

Education and skills	<p>the borough</p> <p>Lack of support for transition from education to work</p>	<p>impact on people from deprived areas, BAME (Black and Asian Minority Ethnic) groups and women.</p> <p>Increase in the levels of social deprivation and poverty.</p>
Local employment	<p>Disparities between the east and west of the borough in types of jobs available or occupied by population in part of the borough.</p> <p>Disparity between wages and the cost of living</p> <p>Lack of diversity in jobs available across the borough</p>	<p>Disparities between wages and cost of living and lack of diversity in jobs could impact on Merton's economic growth and stability.</p> <p>Ability to attract a flexible and diverse work force.</p>
Economic growth	<p>Increased pressure infrastructure due to economic growth</p> <p>Lack of high speed and efficient digital connectivity in some part of the borough.</p> <p>Loss of employment land because of housing supply pressures.</p> <p>Insufficient floorspace to meet needs.</p> <p>Lack of affordable business space for small and medium size businesses and start-ups.</p> <p>Adverse impact on town centres as a result of reduction in demand for floorspace.</p>	<p>Without investment in Merton's infrastructure and land use policies to ensure the sufficient provision of employment and business spaces (type, location and cost), Merton cannot have a sustainable local economy. This is likely to threaten Merton's growing local economy, job creation and continuous sustainable growth. All of which will have a direct adverse impact to local populations.</p>

## Appraisal method

IX. The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of the new Local Plan is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended. Several guidance documents have been issued in relation to SA/SEA and the methodologies outlined in these have been used where still applicable:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister (November 2005)
- Practical Guide to the SEA Directive, Office of the Deputy Prime Minister (September 2005).
- Sustainability Appraisal Planning Policy Manual, Planning Advisory Service (2009); and
- Sustainability Appraisal: advice note, Planning Advisory Service (2010).

Figure 6: SA scoring matrix

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

Figure 7: Sustainability Appraisal objectives		SEA Topic requirements
SO1	<b>Air quality:</b> To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Air Human Health Population
SO2	<b>Biodiversity:</b> To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	Biodiversity Flora Fauna
SO3	<b>Land and soil condition and pollutants:</b> To conserve Merton's geodiversity and protect soils from development and over intensive use.	Soil Landscape Human Health Biodiversity Flora Fauna
SO4	<b>Sustainable land use:</b> To make the best and most efficient use of land to support sustainable patterns and forms of development.	Landscape
SO5	<b>Heritage (including architectural and archaeological heritage):</b> To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Cultural heritage, including architectural and archaeological heritage.
SO6	<b>Flood risk management:</b> To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Water Climate Factors Human health
SO7	<b>Climate change:</b> To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Climate Factors Material assets
SO8	<b>Noise and vibration:</b> To minimise noise, vibration levels and disruption to people and communities.	Human Health
SO9	<b>Water quality:</b> To protect and enhance Merton's water bodies.	Water Human Health Flora Fauna
SO10	<b>Water consumption:</b> Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Water Human

SO11	<b>Open space and nature:</b> To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	Biodiversity Flora Fauna Climate Factors Soil Landscape
SO12	<b>Sustainable transport:</b> To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	Population
SO13	<b>Energy use:</b> To improve energy efficiency in new developments and increase renewable energy supply / provision.	Climate Factors Material Assets
SO14	<b>Health and wellbeing:</b> To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Human Health Population
SO15	<b>Housing:</b> To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.	Human Health Population Material Assets
SO16	<b>Safe environments:</b> To contribute to safe and secure environments for all people including the 9 Protected Characteristics.	Human Health Population
SO17	<b>Population demand and growth:</b> To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.	Human Health Population Material Assets
SO18	<b>Social inclusion and cohesion:</b> To ensure Merton has socially integrated communities which are strong, resilient and inclusive.	Human Health Population
SO19	<b>Design:</b> To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.	Human Health Population Air Climate Factors Landscape
SO20	<b>Local employment:</b> To develop and maintain a healthy labour market.	Human Health Population Material assets
SO21	<b>Education and skills:</b> To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with	Population Human Health

	disabilities and Black Asian and Minority Ethnic groups.	Material assets
SO22	<p><b>Economic growth:</b></p> <p>To increase the vitality and viability of existing town centres, local centres and parades</p> <p>To ensure that there is a mixed of business spaces including, affordable spaces in Merton.</p>	<p>Population</p> <p>Human Health</p> <p>Material assets</p>

## SA Assessment Framework and decision-making criteria.

Figure 8: SA framework and decision-making criteria.

Sustainability Objectives	Decision making criteria.	Assessing of Local Plan Policies
<p><b>Air quality</b> To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</p>	<ul style="list-style-type: none"> <li>• Will it impact on locations that are sensitive to air pollution?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• The whole borough is an Air Quality Management Area</li> <li>• Annual air quality reports</li> </ul>
<p><b>Biodiversity</b> To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</p>	<ul style="list-style-type: none"> <li>• Will it impact on national, regional or local BAP habitats and/or species?</li> <li>• Does it affect a site designated for nature conservation purposes?</li> <li>• Will it impact on access to nature?</li> <li>• Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non- designated sites?</li> <li>• Will it impact on existing networks of open spaces and create new green spaces?</li> <li>• Will it lead to a degradation or fragmentation of the green spaces?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Sites designated for nature conservation purposes, including SSSI (Sites of Special Scientific Interest) and SINCS (Sites of Importance to Nature Conservation).</li> <li>• Existing on-site habitats and biodiversity</li> </ul>
<p><b>Land and soil condition and pollutants</b> To conserve Merton's geodiversity and protect soils from development and over intensive use.</p>	<ul style="list-style-type: none"> <li>• Will it safeguard soil quality and quantity?</li> <li>• Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non- designated sites?</li> <li>• Will it impact on existing networks of open spaces and create new green spaces?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Potential contaminated land</li> <li>• Existing use and buildings</li> </ul>
<p><b>Sustainable land use</b></p>	<p>Does it make a positive impact?</p>	<p>Analysis of:</p>

<p>To make the best and most efficient use of land to support sustainable patterns and forms of development.</p>	<p>Does it support positive sustainable patterns? Will, it bring disused sites into use, which benefits residents?</p>	<ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Vacant sites</li> <li>• Derelict sites</li> <li>• Potential options for future land uses</li> </ul>
<p><b>Heritage (including architectural and archaeological heritage)</b> To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.</p>	<ul style="list-style-type: none"> <li>• Will it affect the significance of heritage assets through direct impacts or impacts on their setting?</li> <li>• Will the design enhance the local character?</li> <li>• Have opportunities that make a positive contribution to the local character and area been identified?</li> <li>• Will it impact on any potential archaeological remains?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Historic Parks and Gardens</li> <li>• Conservation Area(s)</li> <li>• Listed Building(s)</li> <li>• Archaeological Priority Areas</li> </ul>
<p><b>Flood risk management</b> To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</p>	<ul style="list-style-type: none"> <li>• Will the proposal be affected by flooding, i.e. is it within zone 2, 3a or 3b?</li> <li>• Will it lead to increased surface water flooding?</li> <li>• Will it lead to sewer flooding?</li> <li>• Will it impact or increase the risk of flooding to other people and property?</li> <li>• Will it promote and include climate change adaptation measures?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Location within flood zone</li> <li>• Surface water maps</li> <li>• Localised flooding maps, where available</li> </ul>
<p><b>Climate change</b> To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by</p>	<ul style="list-style-type: none"> <li>• Will it promote and include climate change adaptation measures?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Potential options for future land</li> </ul>

2050.		uses
<b>Noise and vibration</b> To minimise noise, vibration levels and disruption to people and communities.	<ul style="list-style-type: none"> <li>• Will it impact on locations that are sensitive to noise pollution?</li> </ul>	Analysis of: <ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Potential options for future land uses</li> </ul>
<b>Water quality</b> To protect and enhance Merton's water bodies.	<ul style="list-style-type: none"> <li>• Will it impact on water quality?</li> </ul>	Analysis of: <ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Potential options for future land uses</li> </ul>
<b>Water consumption</b> Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	<ul style="list-style-type: none"> <li>• Will it impact on water quality?</li> <li>• Will it lead to increased surface water flooding?</li> <li>• Will it lead to sewer flooding?</li> </ul>	Analysis of: <ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Potential options for future land uses</li> </ul>
<b>Open space and nature</b> To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	<ul style="list-style-type: none"> <li>• Will it increase or decrease public open space deficiency?</li> <li>• Will it lead to loss or degradation of designated spaces such as MOL (Metropolitan Open Land)?</li> <li>• Will it improve connectivity between existing open spaces?</li> </ul>	Analysis of: <ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Metropolitan Open Land</li> <li>• Historic Parks and Gardens</li> </ul>
<b>Sustainable transport</b> To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	<ul style="list-style-type: none"> <li>• Will it increase access to essential services?</li> <li>• Will it assist in improve health and wellbeing?</li> </ul>	Analysis of: <ul style="list-style-type: none"> <li>• Area of relative disadvantage</li> <li>• Access to essential services</li> <li>• Public open space deficiency</li> <li>• Town Centre Boundary</li> <li>• Public Right of Way</li> </ul>

<p><b>Energy use</b> To improve energy efficiency in new developments</p> <p>Increase renewable energy supply / provision.</p>	<ul style="list-style-type: none"> <li>• Will it improve and reduce energy use?</li> <li>• Will it lead to more energy efficient uses?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Potential options for future land uses</li> </ul>
<p><b>Health and wellbeing.</b> To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</p>	<ul style="list-style-type: none"> <li>• Will it reduce the health inequalities in areas of poor health?</li> <li>• Will it improve mental health and wellbeing?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Areas of deprivation and inequalities</li> <li>• Potential options for future land uses</li> </ul>
<p><b>Housing</b> To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand</p>	<ul style="list-style-type: none"> <li>• Will it increase the number of homes?</li> <li>• Will it increase the number of affordable homes?</li> <li>• Will it reduce the number of unsuitable/unfit homes?</li> <li>• Does it achieve Lifetime Homes Standard and increase accessibility for wheelchair users?</li> </ul>	<ul style="list-style-type: none"> <li>• Existing use and buildings</li> <li>• Potential options for future land uses</li> <li>• Conservation Areas</li> <li>• Public Health plans and strategies</li> <li>• Wider determinates of health</li> <li>• Areas of deprivation</li> </ul>
<p><b>Safe environments</b> To contribute to safe and secure environments for all people including the 9 Protected Characteristics.</p>	<ul style="list-style-type: none"> <li>• Does it follow Security by Design principles?</li> <li>• Will it contribute to a reduction in the actual crime level?</li> <li>• Will it contribute to a reduction in the fear of crime?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Areas of deprivation and inequalities</li> <li>• Potential options for future land uses</li> </ul>

<p><b>Population demands and growth.</b> To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.</p>	<ul style="list-style-type: none"> <li>• Will it reduce the levels of socio-economic inequalities?</li> <li>• Will it ensure that developments such as housing and essential services meet demographic demands and growth?</li> <li>• Will it provide sustainable development that will reduce inequalities?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Areas of deprivation and inequalities</li> <li>• Local services/essential services</li> <li>• Predicted population projections.</li> <li>• Public Health England health profiles</li> </ul>
<p><b>Social inclusion and cohesion</b> To ensure Merton has socially integrated communities which are strong, resilient and inclusive.</p>	<ul style="list-style-type: none"> <li>• Does it follow Security by Design principles?</li> <li>• Will it contribute to a reduction in the actual crime level?</li> <li>• Will it contribute to a reduction in the fear of crime?</li> <li>• Will it reduce deprivation?</li> </ul>	<p>Analysis of: Disadvantaged areas/inequality</p>
<p><b>Design</b> To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</p>	<ul style="list-style-type: none"> <li>• Does it follow Security by Design principles?</li> <li>• Will it contribute to a reduction in the actual crime level?</li> <li>• Will it contribute to a reduction in the fear of crime?</li> <li>• Will it reduce the use of the car?</li> <li>• Will it assist in building strong communities?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Disadvantaged areas/inequality</li> <li>• Potential options for future land uses</li> </ul>
<p><b>Local employment</b> To develop and maintain a healthy labour market.</p>	<ul style="list-style-type: none"> <li>• Will it lead to the creation of jobs?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Employment data from NOMIS</li> <li>• Employment use</li> <li>• Disadvantaged areas/inequality</li> </ul>
<p><b>Education and skills</b></p>	<ul style="list-style-type: none"> <li>• Will it impact on the local economy?</li> </ul>	<p>Analysis of:</p>

<p>To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and BAME groups.</p>	<ul style="list-style-type: none"> <li>• Will it lead to local economic growth?</li> <li>• Does it provide jobs?</li> <li>• Will it increase employment opportunities?</li> <li>• Will it increase training and skilled employment?</li> </ul>	<ul style="list-style-type: none"> <li>• Employment use</li> <li>• Disadvantaged areas/inequality</li> </ul>
<p><b>Economic growth and town centres</b> To increase the vitality and viability of existing town centres, local centres and parades.</p>	<ul style="list-style-type: none"> <li>• Will it improve business development?</li> <li>• Will it impact on the local economy?</li> <li>• Will it lead to local economic growth?</li> <li>• Does it provide jobs?</li> <li>• Will it meet local business needs?</li> <li>• Will the site/land use include commercial development?</li> </ul>	<p>Analysis of:</p> <ul style="list-style-type: none"> <li>• Employment use</li> <li>• Town Centre Boundary</li> <li>• Area of Mixed Use</li> </ul>

- X. The figure below assesses the Local Plan Strategic Objective against the Sustainability Objectives. The Strategic Objectives apply to the whole of Merton and provide a framework for the Local Plan, acting as steppingstones to deliver the Spatial Vision. Merton’s Community Plan and the London Plan have guided Merton’s Strategic objectives. The main report assesses the individual policies of the Local Plan.

Figure 9: Local Plan Objectives

Local Plan Objectives	Sustainability Objectives																						
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	
Supporting Resilience	Light Green	Light Green	White	Light Green	Light Green	Light Green	Dark Green	White	White	White	White	Light Green	Light Green	Dark Green	White	White	Light Green						
Good growth	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	White	Light Green	Dark Green	Dark Green	Dark Green									
Tackling Climate Change	Light Green	Light Green	Light Green	Light Green	White	Light Green	Dark Green	Light Green	Dark Green	Light Green	White	White	Light Green										
Places and the 20-minute neighbourhood	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	White	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green
Places for people	Light Green	Light Green	White	White	Light Green	White	White	White	White	White	White	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green

- XI. The Local Plan Strategic Objectives perform strongly against the Sustainability Objectives, collectively meeting all the Sustainability Objectives.

## Monitoring and mitigation

- XII. The SEA Regulations require that *“the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”* and that the environmental report should provide information on *“a description of the measures envisaged concerning monitoring”*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- XIII. Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. In line with a precautionary approach, those SA objectives against which no significant adverse effects have been identified but uncertainty is recorded have been included in the monitoring framework. Significant adverse effects and/or uncertain effects have been identified against all SA objectives apart from SA objectives (18), social inclusion.
- XIV. The Local Plan as well as the baseline data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Where uncertain impacts have been identified in relation to Sustainability Objectives these should be removed as a result of further work that will be undertaken as part of the planning application process. Specific attention should be given to the uncertain impacts identified when reviewing development proposals, assessed as part of this SA/SEA. The specific mitigation measures must be provided in more and full detail at the development planning application submission, to ensure that any adverse impacts are suitably addressed. Monitoring of the impacts will be addressed through the Annual Monitoring Report (AMR).
- XV. Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. As the Local Plan has been developed in parallel to SA process, mitigation measures have been incorporated on a continual basis.

Figure 10: Local Plan monitoring indicators.

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
<p><b>Air quality</b> To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</p>	<p>Number of days p.a. when air pollution is moderate or high for PM10*</p> <p><i>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre, more than 35 times a year, at any measuring site.</i></p>	Merton Council by way of Merton’s Annual Monitoring Report (AMR)	3 years
<p><b>Biodiversity</b> To protect and conserve Merton’s biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</p>	Changes of in areas of biodiversity importance.	Merton Council by way of Merton’s AMR (Authority Monitoring Report)	3 years
<p><b>Land and soil condition and pollutants</b> To conserve Merton’s geodiversity and protect soils from development and over intensive use.</p>	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Environment Agency and Merton Council by way of Merton’s AMR	Every year
<p><b>Sustainable land use</b> To make the best and most efficient use of</p>	Planking permission grant and completed	Merton Council by way of Merton’s AMR	Every year

land to support sustainable patterns and forms of development.			
<b>Heritage (including architectural and archaeological heritage)</b> To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Number of Listed Buildings at risk	Merton Council by way of Merton's AMR (Authority Monitoring Report)	Every year
<b>Flood risk management</b> To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Number of planning permissions granted contrary to Environment Agency advice.	Environment Agency and Merton Council by way of Merton's AMR.	Every year
<b>Climate change</b> To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Reduction in carbon emissions from new build developments	Merton Council by way of Merton's AMR.	Every 3 years
	Reporting on carbon offsetting proposed where on-site reduction isn't achievable	Merton Council by way of Merton's AMR and Infrastructure Funding Statement	Annually
<b>Noise and vibration</b> To minimise noise, vibration levels and disruption to people and communities.	An increase in areas of the Noise action planning important areas.	Defra	3 years
<b>Water quality</b>	Planning permissions	Environment Agency	Every year

To protect and enhance Merton's water bodies.	granted contrary to Environment Agency advice on flooding and water quality grounds. River water bodies classified under the Water Framework Directive to achieve good ecological status.	and Merton Council by way of Merton's AMR	
<b>Water consumption</b> Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.	Thames Water and, Sutton and East Surrey Water companies.	3 years
	Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.	Merton Council by way of the AMR	
<b>Open space and nature</b> To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	The proportion of net loss open space for development apart for educational establishments.	Merton Council by way of the AMR	Every year
<b>Sustainable transport</b> To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	The proportion of journeys made by public transport and sustainable mode of travel.  Increase in footfall at bus stops, underground, tram	Merton Council and Transport for London (TfL) by way of the AMR	3 years

	stops and railway stations.		
<b>Energy use</b> To manage and reduce demand for energy.	Average percentage improvement over Part L of the Building Regulations	Merton Council by way of the AMR	2 years
<b>Health and wellbeing.</b> To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Delivery of healthcare facilities identified in Merton's Local Plan  Number of people taking up physical activities and stating they are in 'good health.'  Number of Health Impact Assessments carried out and type of development.	Merton Council, Merton Public Health, CCG (Clinical Commissioning Groups) and other health and wellbeing partners.  Merton Council and Merton Public Health	3-5 years  3- 5 years.
<b>Housing</b> To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand	Progress against borough wide affordable housing target  Number of homes built	Merton Council by way of the AMR	Annually
<b>Safe environments</b> To contribute to safe and secure environments for all people including the 9	Number of Health Impact Assessments carried out and type of development.	Merton Council and Merton Public Health	3 years

Protected Characteristics.			
<b>Infrastructure</b> To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.	Number and of healthcare provision The number of pharmacies and any gaps in provision in the borough.	Infrastructure Delivery Plan (live document)  Public Health, Pharmacy Needs Assessment	Annually  5 years
<b>Design</b> To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.	Increase number of major schemes reviewed by the Design Review Panel at pre – application stage.	Merton Council by way of the AMR	Annually
<b>Local employment</b> To develop and maintain a healthy labour market.	Number of people unemployed  Number of new jobs created.	Merton Council, Merton Chamber of Commerce and Jobcentre Plus	Every year
<b>Education and skills</b> To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.	Deliver to meet statutory delivery to secure sufficient school places.  Number of 16- 24-year-olds in training or apprenticeships or work programmes  Number of people employed	Merton Council by way of the AMR	Every year

	or in training as part of large or regeneration developments.		
<b>Economic growth and town centres</b> To increase the vitality and viability of existing town centres, local centres and parades.	Maintain the retail vacancy rate below national and regional rates.	Merton Council by way of the AMR	Every year

## Other assessments

### Habitat Regulation Assessments

- XVI. The EC (European Commission) Habitats Directive 1992 and Wilds Birds Directive 2009 as transposed into UK (United Kingdom) law by the Conservation of Habitats and Species Regulations 2017 (as amended) require a Habitats Regulations Assessment (HRA) of land use plans to establish whether the plan, alone, or in combination with other plans or projects, is likely to have a significant effect on an international nature conservation site (Special Protection Areas (SPA), Special Areas of Conservation (SAC) or Ramsar sites). This is commonly known as the Habitat Regulation.
- XVII. Under the Regulations, local planning authorities must undertake an HRA (Habitat Regulation Assessment) in line with the Habitats Directive where a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects. The following four European sites are found within or in relatively proximity to the plan area and are therefore potentially affected by the new Local Plan:
- Richmond Park SAC (Special Area of Conservation)
  - Wimbledon Common SAC

## Health Impact Assessments

- XVIII. The purpose of HIA (Health Impact Assessment) is to promote sustainable development by integrating health (including mental health) and wellbeing considerations into the preparation of plans or strategies; by identifying the key health and wellbeing issues and the groups that are likely to be affected by the implementation of the Plan.

## Equalities Impact and Diversity Assessment (EDIA)

- XIX. The Equality Act 2010 replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it's unlawful to treat someone. Before the Act came into force there were several pieces of legislation to cover discrimination, including:

- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995

- XX. At the decision-making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics' which includes the following:

- Age
- Disability
- Sex/Gender
- Race or belief
- Religion
- Sexual Orientation
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity

- XXI. The purpose of the EDIA is to assess the impact of a policy, strategy or service in the borough in terms of race, gender and disability. The consideration of religion, age and sexual orientation are also encouraged. Although the subsequent Equality Act 2010 removed the formal requirement for public bodies in England to undertake or publish a detailed EDIA of

their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to 'give due regard' to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty.

# SA/SEA: Technical report

## 1 Purpose of Sustainability Appraisal and incorporating the Strategic Environment Assessment (SEA)

1.1 The EU (European Union) Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK (United Kingdom) 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.

1.2 SEA Regulations 2004 Schedule 2 (6) states that:

The likely significant effects on the environment, including short, medium- and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—

- a) Biodiversity.
- b) Population.
- c) Human health.
- d) Fauna.
- e) Flora.
- f) Soil.
- g) Water.
- h) Air.
- i) Climatic factors.
- j) Material assets.
- k) Cultural heritage, including architectural and archaeological heritage.
- l) Landscape; and
- m) The inter-relationship between the issues

- 1.3 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 plans and strategies. It is imperative to begin SEA at the first stages of plan making to identify the key sustainability issues likely affected by the implementation of the plan; it helps with creating development options and assesses any significant effects of the proposed development. SA/SEA's are a valuable tool for developing sound planning policies and planning development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.
- 1.4 The purpose of this Report is to develop and refine alternatives and assessing the effects by:
- Test the Local Plan objectives against the SEA/SA objectives
  - Developing strategic alternatives
  - Predicting the effects of the Local Plan, including alternatives
  - Evaluating the effects of the Local Plan
  - Mitigating adverse effects
  - Proposing measures to monitor the environmental effect of the Local Plan.
  - Consulting the public and the statutory environmental bodies on the draft plan and report
- 1.5 At the conclusion of plan preparation, the final SA/SEA report should show how the final Local Plan (herby referred to as the 'Plan') has addressed the sustainability agenda and the choices made between alternative policies and proposals. The Inspector, when deciding the 'soundness' of the plan at the Public Examination stage, will consider this.
- 1.6 The NPPF states that assessments should be proportionate and should not repeat policy assessment that has already been undertaken. Wherever possible the local planning authority should consider how the preparation of any assessment will contribute to the plan's evidence base. The process should be started early in the plan making process and key stakeholders should be consulted in identifying the issues that the assessment must cover.
- 1.7 The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need

to be done in any more detail, or using more resources, than is appropriate for the content and level of detail in the Local Plan.

## 2 Review of other plans

1.8 A review of plans was initially carried out for the [Scoping Report](#) (November 2018) and reviewed at each stage of the SEA/SA process.

Figure 11: Review of plans

International
Kyoto Protocol to the United Nations Framework convention on climate change (1997)
Johannesburg Declaration on Sustainable development 2002
The UN Sustainable Development Goals (SDGs) 2015
UNESCO World Heritage Convention
European
Brexit Bill 2019
EU Biodiversity Strategy (2020)
European Landscape Convention (ratified by the UK Government in 2006)
EU Sixth Environment Action Plan (Sustainable Development Strategy) (2002)
European Spatial Development Perspective Report (1999)
EU (European Union) Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)
Air Quality Framework (EU Directive 96/62/EC and daughter directives (99/30/EC), (2000/69/EC), (2002/3/EC)
Assessment of the Effects of Certain Public and Private Projects on the Environment (EIA (Environmental Impact Assessment) Directive 85/337/EEC)
Assessment and Management of Environmental Noise (END Directive 2002/49/EC)
Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)
Conservation of Wild Birds (Directive 79/409/EEC)
Energy Performance of Buildings (EU Directive 2002/91/EC)

Energy Efficiency (Directive 2012/27/EU)	
Floods Directive (EU Directive 2007/60/EC)	
Landfill Directive 1999/31/EC	
Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)	
Renewable Energy (EU Directive 2009/28/EC)	
Strategic Environmental Assessment (SEA Directive 2001/42/EC)	
Urban Wastewater Directive (91/271/EEC)	
Waste Framework Directive 75/442/EEC	
Water Framework Directive (EU Directive 2000/60/EC)	
National Regulations	
Emerging Planning reforms –White Paper	
Use class order 2020.	
Air Quality Standards Regulations (2010)	These Regulations replace the Air Quality Standards Regulations 2007 implement the following Directives: Directive 2008/50/EC on ambient air quality and cleaner air for Europe (this Directive replaces Council Directive 96/62/EC on ambient air quality assessment and management, Council Directive 1999/30 EC (European Commission) relating to limits for sulphur dioxide, nitrogen dioxide, oxides of nitrogen, particulate matter and lead in ambient air, Council Directive 2000/69/EC relating to limit values for benzene and carbon monoxide in ambient air, Council directive 2002/3/EC relating to ozone in ambient air.) Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air.
Conservation of Habitat and Species Regulations, 2017	The Conservation of Habitats and Species Regulations 2017 (the “Habitats Regulations”) transposes the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements

	of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives)
Building Regulations: England and Wales (Part L – Conservation of Fuel and Power, 2010) and (Part G Sanitation, hot water safety and water efficiency, 2010)	Part L – Conservation of fuel and power. The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect on 1 October 2010 and provide practical guidance on ways of following the energy efficiency requirements and regulation 7 of the Building Regulations 2010 (SI2010/2214) for England and Wales. The 2010 edition of Approved Document G - Sanitation, hot water safety and water efficiency, has been updated to incorporate amendments made to reflect any changes arising because of the Building Regulations 2010 and replaces the previous edition of Approved Document G - Sanitation, hot water safety and water efficiency.
Climate Change Act (2008) The Climate Change Act 2008 (2050 Target Amendment) Order 2019	The Climate Change Act aim is to manage and responding to climate change in the UK.  Legislation requiring the government to reduce the UK's net emissions of greenhouse gases by 100% relative to 1990 levels by 2050
Community Infrastructure Levy Regulations 2010 (and subsequent amendments)	The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area.
Deregulation Act 2015	The Deregulation Act provides for the removal or reduction of burdens on businesses, civil society, individuals, public sector bodies and the

	<p>taxpayer. As far as are practicable all necessary technical housing standards should now be included in the main building regulations rather than within development plans. The act provides for an amendment to be made to the Planning and Energy Act 2008. Section 1(1)(c) of that Act provides that local planning authorities may include in their plan's requirements that development in their area meets higher standards of energy efficiency than are required by building regulations. The government policy meanwhile is that new dwellings meet a zero-net carbon emissions standard from 2016. Building regulations should also provide for optional requirements. Local planning authorities will be able where circumstances justify it, to make it a condition of planning permission for developments that they comply with one or more such optional requirements, which will then apply to the development as building regulations requirements and be inspected and enforced as such.</p>
<p>Energy Act 2008</p>	<p>The Energy Act 2008 updates energy legislation to:</p> <ul style="list-style-type: none"> <li>reflect the availability of innovative technologies and emerging renewable technologies</li> <li>correspond with the UK's changing requirements for secure energy supply</li> <li>protect our environment and the taxpayer as the energy market changes</li> </ul>
<p>Environment Bills 2021/22 (pending)</p>	<p>The Bill aims to:</p> <ul style="list-style-type: none"> <li>• Increase local powers to tackle sources of air pollution.</li> <li>• Protect nature and improve biodiversity by working with developers.</li> </ul>

	<ul style="list-style-type: none"> <li>• Extend producer responsibility, ensure a consistent approach to recycling, introduce deposit return schemes, and introduce charges for specified single use plastic items.</li> <li>• Secure long-term, resilient water and wastewater services, including through powers to direct water companies to work together to meet current and future demand.</li> </ul>
The government's 25-year Environment Plan	A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation.
National Flood and Coastal Erosion Risk Management Strategy for England (2020)	<p>The strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.</p> <p>Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change.</p> <p>Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.</p> <p>A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to take action.</p>
EA2025 action plan	<p>The Environment Agency vision for the future into action. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> <li>• a nation resilient to climate change</li> </ul>

	<ul style="list-style-type: none"> <li>• healthy air, land and water</li> <li>• green growth and a sustainable future.</li> </ul>
Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts.
Environmental Noise (England) Regulations 2006 (as amended)	The regulations move the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.
Flood and Water Management Act 2010	<p>The Act updates legislation to ensure; better protection from flooding, manage water more sustainably, improve public services and secure water resources during periods of drought. The Flood and Water Management Act gives local authorities new responsibilities. There are now classed as lead local flood authorities (LLFAs) who have responsibilities for managing local flood risk in their area. The responsibilities of a LLFA (Lead Local Flood Authority) include:</p> <ul style="list-style-type: none"> <li>prepare and maintain a strategy for local flood risk management in their areas, co-ordinating views and activity with other local bodies and communities through public consultation and scrutiny, and delivery planning</li> <li>maintain a register of assets – these are physical features that have a significant effect on flooding in their area</li> <li>investigate significant local flooding incidents and publish the results of such investigations</li> <li>establish SUDS approval bodies (SABs) that will be responsible for the approval of design, build and adoption of SUDS</li> </ul>

	<p>issue consents for altering, removing or replacing certain structures or features on ordinary watercourses</p> <p>play a lead role in emergency planning and recovery after a flood event</p>
Flood Risk and Coastal Change, 2014	<p>Advises how to take account of and address the risks associated with flooding and coastal change in the planning process.</p>
Flood Risk Assessments: Climate Change Allowances, 2017	<p>The Flood Risk Assessments: Climate Change Allowances advice updates previous climate change allowances to support NPPF. The Environment Agency (EA) has produced it as the government's expert on flood risk.</p>
Growth and Infrastructure Act 2013	<p>The Act sets out reforms intended to reduce red tape, that the government considers hampers business investment, new infrastructure and job creation.</p>
Housing and Planning Act 2016	<p>Through this Act, the Government aims to take forward proposals to build more homes that people can afford, give more people the chance to own their own home and ensure the way housing is managed is improved. The Act seeks to achieve this in part, by implementing reforms that will make sure that the planning system does not add any unnecessary obstacles to the delivery of new homes. The Act includes provision for the delivery of Starter Homes and Social Housing. The Act also provides for "permission in principle" ("PIP") for housing led development, which will provide developers with greater certainty of consent at an earlier stage in the development cycle.</p>
Local Government White Paper: Strong and Prosperous Communities (2009)	<p>The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship</p>

	between central government, local government and local people.
Natural Environment and Rural Communities Act (2006)	The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy. The Act is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.
Planning and Compulsory Purchase Act (2004)	The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government's policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.
Planning and Energy Act (2008)	This Act allows local councils to set targets in their areas for on-site renewable energy, on site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.
Planning Act (2008)	The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new streamlined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the town and country planning system and the introduction of a

	Community Infrastructure Levy (CIL).
Localism Act (2011)	<p>The Localism Act takes power from central government and hands it back to local authorities and communities giving them the freedom and flexibility to achieve their own ambitions. There are five key measures in the Localism act:</p> <ul style="list-style-type: none"> <li>Community Rights</li> <li>Neighbourhood Planning</li> <li>Housing</li> <li>Empowering cities and other local areas</li> <li>General power of competence</li> </ul> <p>Dissimilar parts of the Act will come into effect at separate times.</p>
National Planning Policy Framework (2019 and 2021 draft), NPPF draft 2021, Nation Planning Policy for Waste (2014) and National Planning Practice Guidance (2021)	<p>The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. The NPPF sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. At the heart of the NPPF is a presumption in favour of sustainable development. For plan making this means that:</p> <p>local planning authorities should positively seek opportunities to meet the development needs of their area.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> <li>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or</li> <li>specific policies in this Framework indicate development should be restricted</li> </ul>

	<p>For decision taking this means:</p> <p>approving development proposals that accord with the development plan without delay; and</p> <p>where the development plan is absent, silent or relevant policies are out of date, granting permission unless:</p> <p>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or</p> <p>specific policies in this Framework indicate development should be restricted</p>
Neighbourhood Planning Regulations (2012)	The Regulations set out the procedure for the designation of neighbourhood areas, neighbourhood forums and for the preparation of neighbourhood development plans and neighbourhood development orders (including community right to build orders).
Sustainable Communities Act 2007 (Amended 2010) and Sustainable Communities Regulations 2012	The Sustainable Communities Act 2007 provides an opportunity for communities to identify legislative barriers that prevent them from improving the sustainability of their local areas and discuss them with their local authorities. If the barrier needs Government action to remove it, local authorities can ask government to remove it.
Town and Country Planning Act (1990)	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales
The Town and Country Planning (Environmental Impact Assessment) (Amendment) (England) Regulations 2008	These Regulations amend the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1991 so that they apply to applications for subsequent approval of matters under conditions attached to planning permissions.

<p>The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999</p>	<p>These regulations outline the procedure for considering environmental impact when deterring planning permission applications.</p>
<p>The Town and Country Planning (Environmental Impact Assessment) Regulations 2011</p> <p>And Amendment 2015</p>	<p>These Regulations replace the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI No. 293) (“the 1999 Regulations”) and subsequent amending instruments. The Town and Country Planning (Environmental Impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales. These regulations provide a consolidation of the 1999 regulations to reflect amendments to the EIA (Environmental Impact Assessment) directive and recent case law.</p>
<p>The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995</p>	<p>These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.</p>
<p>The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2010</p>	<p>This order amends the GDPO 1995 in relation to:</p> <ul style="list-style-type: none"> <li>• Design and access statements</li> <li>• Publicity of planning applications</li> <li>• Time limits for lodging certain planning appeals</li> <li>• Provisions to include on the planning register applications for non-material amendments</li> </ul>
<p>The Town and Country Planning (General Permitted</p>	<p>The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country</p>

<p>Development) (Amendment) (England) Order 2012</p>	<p>Planning (General Permitted Development) Order 1995 (“GPDO”) by:</p> <p>adding a new Part 43 to Schedule 2 to introduce permitted development rights for solar panels, ground and water source heat pumps, and flues forming part of biomass and combined heat and power systems installed on non-domestic premises</p> <p>inserting new paragraphs into Parts 6 and 7 of Schedule 2 to clarify that permitted development rights can apply under those Parts to structures to house biomass boilers, anaerobic digestion systems and associated waste and fuel stores, and hydro turbines installed on agricultural and forestry units, and</p> <p>amending paragraph J of Part 40 of Schedule 2 (interpretation of Part 40) to delete the words “product and installation” from the definition of “MCS Planning Standards”.</p>
<p>The Town and Country Planning (Local Planning) (England) Regulations 2012</p>	<p>The Regulations (a) consolidate the existing Town and Country Planning (Local Development) (England) Regulations 2004 and the amendments made to them; and (b) make new provision and amendments to take account of the changes made by the Localism Act 2011.</p>
<p>The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010</p>	<p>This amendment introduces a definition of houses in multiple occupation into the Use Classes Order.</p>
<p>The Water Resources Act 1991 (Amendment) E&amp;W Regulations 2009</p>	<p>This Act aims to prevent and minimise pollution of water. The Environment Agency are responsible for ensure the Act is enforced. Under the act it is an offence to cause or knowingly permit any poisonous, harmful or polluting material, or any solid waste to enter any controlled water. Silt and soil from eroded areas are included in the definition of polluting material. If eroded soil is found to be polluting a water body or watercourse, the Environment Agency may prevent or</p>

	clear up the pollution and recover the damages from the landowner or responsible person.
The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)	<p>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 consolidate, revoke and replace the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003.</p> <p>The regulations aim to set out the provisions of the Directive in more detail rather than cross-referencing extensively to the Water Framework Directive (WFD).</p>
The Water Act 2003	<p>The four broad aims of the Act are:</p> <ul style="list-style-type: none"> <li>• the sustainable use of water resources.</li> <li>• strengthening the voice of consumers.</li> <li>• a measured increase in competition; and</li> <li>• the promotion of water conservation.</li> </ul>
National: strategies /plans/ publications	
Air Quality Strategy DEFRA 2007	The strategy sets out air quality objectives and policy options to further improve air quality in the UK. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment.
Air Pollution: Action in a changing Climate 2010	This document does not replace the current air quality strategy but accounts for the rapid development of climate change policy since the strategy was published in 2007.
UK Post 2010 Biodiversity Framework	The Framework succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach' and is the result of a change in strategic thinking. The Framework demonstrates how the work of the four countries and the UK contributes to achieving the Aichi Targets, and identifies the

	activities required to complement the country biodiversity strategies in achieving the Targets.
Natural England's – England Biodiversity (2002)	<p>England Biodiversity Strategy was published in 2002. It brings together England's key contributions to achieving the 2010 target to halt biodiversity loss. It also seeks to make biodiversity part of mainstream thinking and emphasises that healthy, thriving and diverse ecosystems are essential to everybody's quality of life and wellbeing. The Strategy has five themes:</p> <ul style="list-style-type: none"> <li>• Protecting the best wildlife sites</li> <li>• Promoting the recovery of declining species and habitats</li> <li>• Embedding biodiversity in all sectors of policy and decision making</li> <li>• Enthusing people</li> <li>• Developing the evidence base.</li> </ul> <p>• An important aim of the strategy is to deliver the UK Biodiversity Action Plan in England, and a measure of success of conserving England's biodiversity is how the status of priority species and habitats is changing.</p>
Biodiversity 2020: A strategy for England's wildlife and ecosystems 2011	Provides a comprehensive picture of how the international and EU commitments are being implemented. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The strategy aims to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.
Securing the Future: UK (United Kingdom) Sustainable	This sets out the national framework for Sustainable Development

<p>Development Strategy (2005)</p>	<p>based on 4 central aims:</p> <ul style="list-style-type: none"> <li>social progress which recognises the needs of everyone</li> <li>effective protection of the environment</li> <li>prudent use of natural resources</li> <li>maintenance of high and stable levels of economic growth and employment</li> </ul> <p>The strategy sets five guiding principles to achieve sustainable development:</p> <ul style="list-style-type: none"> <li>living within environmental limits</li> <li>ensuring a strong, healthy and just society</li> <li>achieving a sustainable economy</li> <li>promoting good governance</li> <li>using sound science responsibly</li> </ul>
<p>Sustainable Construction Strategy (2008)</p>	<p>This Strategy is aimed at providing clarity around the existing policy framework and the future direction of Government policy. It aims to realise the shared vision of sustainable construction by:</p> <ul style="list-style-type: none"> <li>Providing clarity to business on the Government's position by bringing together diverse regulations and initiatives relating to sustainability</li> <li>Setting and committing to higher standards to help achieve sustainability in specific areas</li> <li>Making specific commitments by industry and Government to take the sustainable construction agenda forward</li> </ul>
<p>UK Low Carbon Transition Plan (2009)</p>	<p>The low carbon transition plan sets out how the government is to meet its binding carbon budget of an 18% cut in emissions on 2008 levels by</p>

	<p>2020 (34% on 1990 levels). It also allocated individual carbon budgets for the major UK government departments, which are expected to produce their own plans.</p>
<p>Carbon Plan 2011</p>	<p>The Carbon Plan was published in December 2011 and sets out the Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the 2050 target. This publication brings together the Government's strategy to curb greenhouse gas emissions and deliver our climate change targets, as well as the updated version of our actions and milestones for the next five years; replacing the draft Carbon Plan published in March 2011. Part 1, 2 and 3 of the report, Annex A and Annex B set out the Government's strategy for delivering carbon budgets and fulfil the legal obligation to report on what the UK is doing to ensure it meets carbon budgets set in law. Annex C of this report sets out, department by department, actions and deadlines for the next five years.</p>
<p>Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (DECC 2012)</p>	<p>This is an Energy Efficiency Strategy to maximise existing policy and realise the wider energy efficiency potential that is available in the UK economy.</p>
<p>Estate Regeneration National Strategy - Good Practice Guide Part 1, DCLG December 2016</p>	<p>The estate regeneration good practice guide sets out key considerations for schemes at the preliminary stages and a model process for successful regeneration. The guide is for all stakeholders in estate regeneration schemes for example landowners, residents, local authority officers and members, consultants, developers, public service providers, businesses and charities. It should be read in conjunction with the other components of the estate regeneration national strategy, including guidance on resident engagement and protection, finance and delivery.</p>

	<p>The guide sets out the principal activities, considerations, key participants and source material for typical regeneration projects at the preparation, planning or delivery stages of projects. This guidance does not intend to set out a list of mandatory requirements for estate regeneration schemes. It is intended as a general good practice guide for all stakeholders to consider in relation to the characteristics and challenges of each individual scheme.</p>
<p>Laying the Foundations: A Housing Strategy for England (2011)</p>	<p>A radical new strategy to reignite the housing market and get the nation building again was launched on 21 November by the Prime Minister. The Housing Strategy sets out a package of reforms to get the housing market moving again; lay the foundations for a more responsive, effective and stable housing market in the future; support choice and quality for tenants; improve environmental standards and design quality.</p> <p>The new strategy addresses concern across the housing market making it easier to secure mortgages on new homes, improving fairness in social housing and ensuring homes that have been left empty for years are lived in once again.</p>
<p>The government's 25-year Environment Plan</p>	<p>A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation.</p>
<p>National Flood and Coastal Erosion Risk Management Strategy for England (2020)</p>	<p>The strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.</p> <ul style="list-style-type: none"> <li>• Climate resilient places: working with partners to bolster</li> </ul>

	<p>resilience to flooding and coastal change across the nation, both now and in the face of climate change.</p> <ul style="list-style-type: none"> <li>• Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.</li> </ul> <p>A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action</p>
EA2025 action plan	<p>The Environment Agency vision for the future into action. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> <li>• a nation resilient to climate change</li> <li>• healthy air, land and water</li> <li>• green growth and a sustainable future.</li> </ul>
Environmental Assessment of Plans and Programmes regulations 2004	<p>Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts.</p>
Healthy lives, healthy people: our strategy for public health in England 2010 and update 2011	<p>The strategy sets out a bold vision for a reformed public health system in England including:</p> <ul style="list-style-type: none"> <li>• Local authorities to take new responsibilities for public health</li> <li>• Local authorities to be supported by a new integrated</li> </ul>

	<p>public health service such as Public Health England</p> <ul style="list-style-type: none"> <li>• A stronger focus to be placed on outcomes across the system</li> <li>• Public health as a clear priority and a core part of business</li> <li>• A commitment to reduce health inequalities.</li> </ul>
DEFRA Sustainable Drainage Systems Non-Statutory Technical Standards for Sustainable Drainage Systems 2015	This document sets out non-statutory technical standards for sustainable drainage systems. They should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance.
Resources and waste strategy for England (December 2018)	strategy sets out how we will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England
Serious and organised crime (2018 review)	A review of serious and organised waste crime and its effects, making recommendations on a strategic approach to waste crime.
National Guidance and other Reference Documents	
Building Research Establishment Environmental Assessment Method (BREEAM)	
Environment Agency: Creating a better place. Our corporate strategy (2010-2015)	
Environment Agency: Climate Change, adapting for tomorrow (2009)	
Environment Agency: Water for people and the environment. Water resources strategy for England and Wales (2009)	
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)	
English Indices of Deprivation (2015)	

National Heritage Protection Plan (2015-18)	
Guidance on Tall Buildings CABE (Commission for Architecture and the Built Environment) and English Heritage (2007)	
Model Procedures for the Management of Contaminated Land-Environment Agency.	
Regional: Plans/strategies	
Clearing London's Air: Air Quality Strategy (2010)	The strategy sets out a framework for improving London's air quality and measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues.
The Control of Dust and emission during construction and demolition (2014) SPG (Supplementary Planning Guidance)	The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London. It also aims to control nitrogen oxides (NOx) from these same activities by introducing an Ultra-Low Emissions Zone (ULEZ) for non-road mobile machinery.
Accessibility and Equity	
Equal Life Chances for All framework (2014)	The Equal Life Chances for All framework 2014 highlights the Mayor's commitment to tackling inequality; improving life chances and removing barriers that prevent people from reaching their full potential.
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2014)	This provides detailed guidance on the policies contained in the London Plan to make places usable by everyone especially disabled people.
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)	This SPG provides guidance to London boroughs, partners and developers on the implementation of policies in the London Plan, which relate to equalities issues and addressing the needs of London's diverse communities.
Climate Change and Energy	

<p>Climate Change Mitigation and Energy Strategy (2011)</p>	<p>This strategy focuses on reducing CO2 emissions to mitigate climate change, securing a low carbon energy supply for London, and moving London to a thriving low carbon capital. It forms a central part of the Mayor's goal of retrofitting London. The Mayor's activity to achieve this is well underway. His programmes are already making real cuts in CO2 emissions, improving quality of life for Londoners, and creating economic opportunities for the capital.</p>
<p>Managing risks and increasing resilience: Climate Change Adaptation Strategy for London (2010)</p>	<p>The Mayor's Climate Change Adaptation Strategy:</p> <ul style="list-style-type: none"> <li>• identifies who and what is most at risk today</li> <li>• analyses how climate change will change the risk of flood, drought and heatwave through the century</li> <li>• describes what action is needed to manage the changes and who is responsible</li> </ul> <p>The key actions proposed in the strategy are:</p> <ul style="list-style-type: none"> <li>• To improve our understanding and management of surface water flood risk</li> <li>• An urban greening programme to increase the quality and quantity of green space and vegetation in London which will buffer London from floods and hot weather</li> <li>• To retro fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes.</li> </ul>
<p>Be Seen Energy Monitoring Assessments Guidance (draft 2020).</p>	<p>This draft guidance provides further details on the 'be seen' stage of the energy hierarchy set out in the Mayor's emerging London Plan</p>

	which requires monitoring and reporting of the actual operational energy performance of buildings for at least five years post construction
Culture	
Cultural Strategy: Cultural Metropolis (2010)	The Mayor's Cultural Strategy sets out his vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. The strategy recognises the significance of the cultural and creative sectors in making London a successful world city and puts forward a case for its continued support and investment – particularly in the run up to the 2012 Olympics and the opportunity it presents for London to undertake a step change in cultural activity and participation.
Economy and skills	
Mayors Economic Development Strategy (2010)	The Mayor's vision is for London to be the best big city in the world. The Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor's ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world's leading low carbon capitals, for all Londoners to share in London's economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.
Mayor's Economic Development Strategy for London (2018)	Sets out the Mayor's plans to grow London's economy, support businesses, boost innovation and create a city that works for all.  The draft strategy has three main goals:  Opening opportunities: everyone should be able to benefit from all

	<p>our city offers</p> <p>Growth: ensuring our economy will continue to thrive and is open to business</p> <p>Innovation: to make London a world leader in technology and a hub of innovative ideas and creativity</p>
Skills Strategy (2018)	<p>The strategy outlines plan to create a post 16 technical and vocational education and skills system that meets the needs of Londoners and businesses.</p> <p>It also calls on London’s businesses, of all sizes and sectors, to outline what they need and what they can contribute to build the workforce of the future.</p>
A vision for a 24-hour city (2017)	<p>This vision sets out the Mayor’s plan to turn London into a leading 24-hour global city, it focuses on building a night-time culture which:</p> <ul style="list-style-type: none"> <li>promotes culture and leisure for all ages and interests</li> <li>increases opening hours</li> <li>ensures safety for residents, visitors and night-time workers</li> <li>works closely with boroughs and the police to create a balanced and sustainable night-time offer</li> </ul> <p>These principles have been developed through conversations with businesses, the Night-time Economy Borough Champions, the police and many others.</p>

	<p>London at night will:</p> <ul style="list-style-type: none"> <li>• Be a global leader.</li> <li>• Provide vibrant opportunities for all Londoners, regardless of age, disability, gender, gender identity, race, religion, sexual orientation or means.</li> <li>• Promote all forms of cultural, leisure, retail and service activity.</li> <li>• Promote the safety and wellbeing of residents, workers and visitors.</li> <li>• Promote welcoming and accessible nightlife.</li> <li>• Promote and protect investment, activity and entrepreneurship.</li> <li>• Promote domestic and international visits to London.</li> <li>• Be strategically found across London to promote opportunity and minimise impact.</li> <li>• Become a 24-hour city that supports flexible lifestyles.</li> <li>• Take account of future global and domestic trends in leisure, migration, technology, employment and economics.</li> </ul>
<p>Environment</p>	
<p>London Environment Strategy (2018)</p>	<p>The strategy sets out the Mayor’s approach to tackling some of the environmental challenges facing London. Toxic air, noise pollution, the threat to green spaces, adverse effect of climate change which all pose a major risk to health and wellbeing of Londoners.</p> <p>This is the first strategy to bring together approaches to every aspect of</p>

	<p>London's environment. It is divided into the following areas:</p> <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Green infrastructure</li> <li>• Climate change mitigation and energy</li> <li>• Waste</li> <li>• Adapting to climate change</li> <li>• Ambient noise</li> </ul>
Flood Risk	
Regional Flood Risk Appraisal (2009)	The Mayor published the Regional Flood Risk Appraisal (RFRA) in October 2009. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed. The RFRA has 19 recommendations, involving or lead by a range of organisations. Progress against the recommendations will be monitored annually in the London Plan Annual Monitoring Report.
Mayor of London: Regional Flood Risk Appraisal (2014)	The Regional Flood Risk Appraisal (RFRA) provides an overview of all sources of flooding in London and addresses its probability and consequences.
The Thames Estuary 2100 Plan (2012)	Recommends how to manage tidal flood risk to the end of the century and beyond. The plan sets out how 1.25 million people and £200 billion worth of property will continue to be protected from tidal flood risk.
Thames River Basin Management Plan (2009)	The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) to promote the concept of sustainable water management. The aims of the plan are:

	<ul style="list-style-type: none"> <li>› To safeguard the sustainable use of water</li> <li>› To protect and restore the status of aquatic ecosystems</li> <li>› To improve aquatic environments by the reduction of hazardous substances</li> <li>› To reduce groundwater pollution</li> <li>› To help mitigate the effects of flood and droughts</li> </ul>
Health	
<p>Better Health for All Londoners: London health inequalities strategy (2018)</p>	<p>The strategy sets out the Mayor’s framework to reduce health inequalities in the capital. The strategy has five aims:</p> <p>Healthy children: every child in London child to have a healthy start</p> <p>Healthy minds: for all Londoners to share in a city with the best mental health in the world.</p> <p>Healthy places: for all Londoners to benefit from a society, environment and economy that promotes good mental and physical health.</p> <p>Healthy communities: for London’s diverse communities to be healthy and thriving. Communities that are better connected and engaged are more socially integrated. They are also healthier.</p> <p>Healthy habits: to ensure that the healthy choice is the easy choice for all Londoners. The combination of smoking, excessive drinking, physical inactivity and an unhealthy diet is too common in some communities, leading to health problems.</p>
<p>NHS (National Health Service) London: Strategic Plan (2008-13)</p> <p>A new 2021 plan is currently being drafted.</p>	<p>A strategic plan that sets out an ambitious programme of work to deliver high-quality, value for money services.</p>

Heritage	
Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment – English Heritage (2010)	The guidance focuses on SEA/SA for development plans, including neighbourhood plans; it is equally applicable to the preparation of SEA/SAs for other types of documents such as Local Transport Plans and Water Resource Management Plans.
English Heritage’s Heritage at Risk Register London (2011)	Identifies listed buildings at risk from neglect, decay, under use or redundancy in London.
Housing	
Good Quality Homes for All Londoners Guidance Draft 2020)	The draft Good Quality Homes for All Londoners guidance: a suite of documents that provides guidance on ensuring land is used in the best way to deliver the right quantity of new housing, at the right quality, in the right place, embedding high-quality design at the centre of housing delivery.
London Housing Strategy (2014)	The overriding aims of this strategy are to increase the supply of housing of all tenures and to ensure that these homes better support London’s continued economic success. The strategy is not just about supply; policies range from improving the existing stock to tackling rough sleeping – but supply is at the heart of it, underpinning each of its five key priorities.
London Housing Strategy (2018)	The aim of the strategy is to address the housing shortage through an intensive use of London’s available land, focusing on more genuinely affordable housing and providing help now for people feeling the effects of the housing crisis - from private renters to rough sleepers.

	<p>This Strategy has five key areas:</p> <ul style="list-style-type: none"> <li>• Building more homes for Londoners</li> <li>• Delivering genuinely affordable homes</li> <li>• High quality homes and inclusive neighbourhoods</li> <li>• A fairer deal for private renters and leaseholders</li> <li>• Tackling homelessness and helping rough sleepers</li> </ul>
<p>GLA (Greater London Authority) Housing Design Guide (2010)</p>	<p>The new 'interim edition' of the London Housing Design Guide sets out the Mayor of London's aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.</p>
<p>Housing Mayor's Supplementary Planning Guidance (2012)</p>	<p>This draft document sets out proposed guidance to supplement the housing policies in the 2011 London Plan (LP). The SPG is informed by the Government's draft National Planning Policy Framework and by its new Housing Strategy for England.</p>
<p>Affordable Housing and Viability SPG (2017)</p>	<p>The draft SPG provides guidance to ensure that policy is as effective as possible. It does not and cannot introduce new policy. The SPG's main aim is to speed up planning decisions and increase the amount of affordable housing delivered through the planning system. Importantly,</p>

	<p>it will help embed the requirement for affordable housing into land values and make the viability process more consistent and transparent, as well as speeding up the planning process for those schemes which are delivering more affordable homes. The guidance set out the preferred approach for all schemes of ten units or more.</p>
Housing Standards (2016)	<p>Minor alterations to the London Plan on Housing Quality and Design, Housing Choice, Sustainable Design and Construction, Water Use and Supplies Policy and Lifetime Neighbourhoods Policy</p>
Homes for Londoners: Good Practice Guide to Estate Regeneration (2018)	<p>The guidance is aimed at local authorities and housing associations, covering three key issues:</p> <ul style="list-style-type: none"> <li>Aims and objectives of estate regeneration.</li> <li>Consultation and engagement with residents.</li> <li>A fair deal for tenants and leaseholders.</li> </ul> <p>Once adopted, the Guide is intended to reassure Londoners that they will be given real opportunities to shape estate regeneration, that engagement and consultation will be meaningful, and that offers of rehousing and compensation will meet guaranteed standards. The principles set out in this draft of the Guide should be read in conjunction with several other documents that address related issues in estate regeneration projects, covering everything from urban design principles to methods of procurement, as well as with statutory housing and planning policy documents.</p>
<p>Infrastructure</p>	
Social Infrastructure SPG (2015)	<p>This document has guidance to support London Plan Policies on Social Infrastructure as set out in Chapter 5 of the London Plan. It particularly</p>

	focuses on those elements of social infrastructure that face the biggest strategic challenges - specifically health, education, sport, faith and burials.
Central London Infrastructure Study (2009)	The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. As well as offering local authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate. This study also identifies existing gaps and shortfalls in infrastructure provision.
Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)	The guidance supports the implementation of the London Plan Policy S4 on 'Play and informal recreation.'
London Plan	
London Plan 2021	Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor must produce a spatial development strategy (SDS) – which has become known as 'the London Plan' – and to keep it under review.  The London Plan is:  the overall strategic plan for London, setting out an integrated

economic, environmental, transport and social framework for the development of London over the next 20–25 years.

the document that brings together the geographic and locational (although not site specific) aspects of the Mayor’s other strategies – including those dealing with:

- Transport
- Economic Development
- Housing
- Culture

a range of social issues such as children and young people, health inequalities and food

a range of environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste

the framework for the development and use of land in London, linking in improvements to infrastructure (especially transport); setting out proposals for implementation, coordination and resourcing; and helping to ensure joined up policy delivery by the GLA Group of organisations (including Transport for London)

the strategic, London-wide policy context within which boroughs should set their detailed local planning policies.

the policy framework for the Mayor’s own decisions on the strategic planning applications referred to the Mayor

an essential part of achieving sustainable development, a healthy economy and a more inclusive society in London.

London Agglomeration Noise Action Plan (2010)	The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction, if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008.
Sunder City: The Mayors Ambient Noise Strategy (2004)	The aim of the Mayor’s ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in and visiting London using the best available practices and technology within a sustainable development framework. Three key issues are: 1. Securing good noise reducing road surfaces 2. Securing a night aircraft ban across London 3. Reducing noise through better planning and design of new housing
Open Space, Biodiversity and environment	
London’s Natural Signatures: The London Landscape Framework (Natural England 2011)	The London Landscape Framework aims to support but also go beyond existing green space policy. The Natural Signatures are a means of encapsulating and evoking the key natural characteristics of the Natural Landscape Areas.
All London Green Grid March (2012)	<p>The All-London Green Grid takes the principles of the East London Green Grid and applies them across London.</p> <p>The concept of a “green grid” – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways – is at the centre of the London Plan’s approach to the provision, enhancement and management of green infrastructure (Policy 2.18). This network of spaces functions best when designed and managed as an interdependent ‘grid.’</p>

	<p>The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations and the economic and social uplift these supports.</p>
<p>Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)</p>	<p>The document details the Mayor's vision for protecting and conserving London's natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space. The strategy is a key step in establishing a London-wide framework for supporting London's diversity of wildlife.</p>
<p>Public London Charter (draft 2020)</p>	<p>The Public London Charter sets out principles for the management and maintenance of public space to help ensure new public spaces are inclusive places, offering the highest level of public access and ensuring any rules or restrictions are only those that are essential for the safe management of the space.</p>
<p>Transport</p>	
<p>Mayors Transport Strategy (2018)</p>	<p>The document sets out the Mayor's policies and proposals to reshape transport in London over the next two decades.</p> <p>Three key themes are at the heart of the strategy.</p> <p>Healthy Streets and healthy people: Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p>

	<p>A good public transport experience: Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <p>New homes and jobs: Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p>
Mayors Transport Strategy (2010)	The Mayor's Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as part of a strategic policy framework to support and shape the economic and social development of London over the next 20 years. It sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision.
Transport for London: Transport Assessment Best Practice Guidance (2010)	<p>The purpose of this document is to provide prominent level guidance to improve the process for TfL and its Land Use Planning Team (LUP) and it does not replace borough guidance on transport assessments.</p> <p>The guidance is relevant to developments that are deemed to be strategically important, and which are referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008.</p>
Water	
Securing London's Water Future (2011)	This is the first water strategy for London and provides a complete picture of the capital's water needs. The strategy calls for organisations

	<p>involved in the city's water management to:</p> <ul style="list-style-type: none"> <li>invest in a water management and sewerage system to ensure London has the water services fit for a world class city and create jobs.</li> <li>support and encourage Londoners to take practical action to save water, save energy and save on their utility bills (a standard package of water saving measures can save a household around 35,000 litres of water per year and £90 off their bills)</li> <li>realise the potential of London's sewage as a clean energy resource to help reduce greenhouse gas emissions and improve energy security.</li> <li>work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London's green spaces.</li> </ul> <p>At the heart of the strategy is a six-point plan to reduce London's water demand. At a time of decreasing supply and increasing demand for water, it makes sense to use the water we have more wisely. The strategy promotes increasing water efficiency and reducing water expenditure to balance supply and demand for water, safeguard the environment and help tackle water affordability problems.</p>
<p>Taking Care of Water: Our Plan for the next 25 years (Thames Water Utilities 2007)</p>	<p>Taking care of water describes a long-term strategy to address a series of issues. It is built around the four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the impact on bills.</p>
<p>Water Resources Management Plan (Thames Water</p>	<p>Sets out how demand for water is balanced against the supply over the</p>

Utilities 2010-2035)	next 25-year period.
Our Plans for Water (Thames Water Utilities 2010-2015)	A five-year Plan, which sets out proposals to maintain and improve services during the period 2010 to 2015.
Merton's Plans and strategies	
Community	
Merton's Sustainable Community Strategy	
Merton's Cultural Strategy - A Better Future for All 2007-10	
Economy	
Employment Land Study 2010	
Merton's Economic Development Strategy 2010 and Refresh 2012	
Merton's Employment and Skills Action Plan 2013-14	
Energy and Climate Change	
Climate Change Strategy and Action Plan (2021)	
Climate Change Strategy 2014- 2017	
Carbon Assessment of Domestic Housing in London Borough of Merton 2010	
Merton Climate Change Research: Town Centre Morden: CHP (Combined Heat and Power) Plant Option Appraisal 2010	
Merton Climate Change: Renewable Energy Resources in Merton - A Preliminary Assessment 2009	
Environment	

Nature Reserve Management Plans (13 in total) 1997-2007
Thames Landscape Strategy 2012
Flood Risk
Strategic Flood Risk Assessment Level 1 (2020) and level 2 (pending 2020/21) – joint with London Borough of Wandsworth
(Joint) Strategic Flood Risk Assessment (Level 1 and 2) (2015 and 2017) (London Boroughs of Wandsworth, Merton, Sutton and Croydon)
Local Flood Risk Management Strategy 2014
Preliminary flood Risk Assessment 2011
Health
Annual Public Health Report 2018
Joint Strategic Needs Assessment year tbc
The Health Needs Assessment: East Merton 2014
Pharmaceutical Needs Assessment 2019
Childhood Obesity Action Plan 2017
Food Poverty Plan 2018
Merton CCG (Clinical Commissioning Groups) Dementia Strategy (TBC) - (Five-year period) tbc
Health in All Policies (HiAP) (emerging)
Autism Strategy (emerging 2021)

Dementia Strategy (emerging 2021)
Design, Heritage and Archaeology
Merton's Conservation Area Character Assessments
Borough Character Study (2021) and Small Sites Toolkit (2021)
Basement and subterranean developments SPD (2019)
Shopfront design guide SPD (2017)
Housing
Affordable Housing Viability Study 2020
Housing Strategy 2012 -15
Housing Delivery Strategy (draft 2021)
Tenancy Strategy 2013
Merton's Older Person Housing Strategy 2008-12
Merton's Neighbourhood Renewal Strategy 2005-10
Strategic Housing Market Assessment 2019
Housing Market Assessment for the Estate Regeneration Areas, February 2017
Viability for the Estate Regeneration Areas, March 2017
Infrastructure

Infrastructure Projects (table 27.2 Core Planning Strategy)
Infrastructure Needs Assessment Study 2008
Infrastructure Delivery Plan (2021).
Merton's Indoor Sports Facility Study 2020
Merton's Playing Pitch Strategy 2019
Green Infrastructure, Open Space and Biodiversity
Merton's Green Infrastructure, Biodiversity and Open Space Study 2020
Merton's Public Realm Strategy 2009
Merton's Allotment Strategy 2007-10
Borough's Sport, Open Space and Recreation Needs Assessment
Merton's Free Play Strategy 2007-2012
Wandle Valley Regional Park: A vision for the future update 2009
Planning
Core Planning Strategy 2011
Sites and Policies Plan 2014
Policies Map 2014
Pollution

Air Quality Action Plan 2018
Contaminated Land Strategy 2005
Transport
Local Implementation Plan for Transport 2019
Waste
Draft South London Waste Plan 2021
South London Waste Plan 2012

### Key findings from the review of plans analysis

- 1.9 All the plans and programmes listed above will influence Merton's new Local Plan to some degree. As a London borough, as major influence will be the London Plan, as the spatial strategy for London and its supporting documents. In addition, the Mayoral strategies, local adopted plans/strategies and evidence-based studies. The objectives contained within these documents will provide the direction for Merton Local Plan.
- 1.10 There is a clear hierarchy of plans and programmes in certain areas descending from the international/European and/or national level through to the local level. The implications for a Local Plan generally, tend to become more specific and precise at the local level and regional level. Several issues are highlighted in the analysis of the plans and programmes as detailed in this report. It will be important the Local Plan to reflect this context and to incorporate the requirements of other plans and programmes as appropriate and for the Sustainability Appraisal to consider the sustainability implications during the appraisal process. The key findings from reviewing plans are set out below:
- Air quality: the urgent need to meet mandatory standards for air quality and cut the annual number of premature deaths from air pollution.
  - Climate Change: the need to design buildings and spaces to adapt and mitigate the effects of climate change,

including overheating, flooding, droughts and more extreme weather events and achieving zero net carbon emissions by 2050.

- Energy Use and Supply: Widening supply and demand gap. Greater efficiencies, use of renewable energy sources, and the importance of low carbon economy.
- Water resources and quality: identified need to focus on the protection, improvements and sustainable use of the water environment.
- Flood Risk: a need to ensure that development is designed in a way that does not increase flood risk, to encourage the use of Sustainable Drainage Systems (SUDS) and that all elements of policy require review to ensure that flood risk is integrated with the management of the rest of London's Environment.
- Natural Environment: facilitating opportunities to integrate biodiversity and the network of green spaces to provide a range of sustainability benefits, i.e. healthy living, improving air, noise and water quality, cooling the urban environment, enhancing biodiversity and ecological resilience. Enhancing existing habitats and providing new areas for biodiversity as opportunities arise.
- Historic Environment: the importance of the social, cultural and economic benefits of the historic environment and the importance of conserving and enhancing designated and non-designated heritage assets and their settings.
- Geology and Soils: a need to focus on prevention and remediation of environmental damage, including land contamination. The need to increase efforts to reduce soil degradation and remediate contaminated sites.
- Materials and Waste: need to apply principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling in all construction.
- Noise and Vibration: a need to minimise noise and vibration levels and the number of people exposed to high levels of noise from development, activities and use.
- Sustainable Land Use: the need to ensure the most efficient use of land which are in keeping with principles of sustainable development.
- Demography: Merton's predicted population growth and increasing aging population.
- Equality and Social Integration: reducing inequalities and the promotion of inclusion and participation opportunities for those groups with protected characteristics to promote social integration and cohesion.
- Health and Health Inequalities: a need to improve the overall health and healthy life expectancy of Merton's residents.
- Housing: to significantly increase the delivery of housing, including a mix of size, tenures, choice and the delivery genuine affordable housing. In addition, the complexity of issues around barriers to housing delivery
- Crime, safety and security: the design of the built environment and the mix of activities can significantly impact on

- fear and actual crime.
- **Connectivity:** integration of land use and transport planning to ensure growth is sustainable and optimises connectivity throughout London. The green network also provides connections which has many health and environmental benefits.
  - **Accessibility:** the need for people to be able to easily and independently access jobs, housing, public spaces, education, public transport, healthcare and amenities and be able to easily and independently move around the built environment.
  - **Employment, training and skills:** employment growth in different sectors ensuring a diverse economy providing opportunities for all.
  - **Culture:** the economic and social benefits of culture.
  - **Townscape, Landscape and Public Realm:** the importance of creating and maintaining a safe, attractive and well-designed public realm which encourages people to walk and cycle, promoting a sense of place and reducing the need to travel to access services and amenities.

## Sustainable Development

- 1.11 The UK Sustainable Development Strategy (ODPM5, 2005) defines sustainable development as “enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations”. The Strategy is based on the following guiding principles:
- 1) **Living within Environmental Limits** Respecting the limits of the planet’s environment, resources and biodiversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.
  - 2) **Ensuring a Strong, Healthy and Just Society** Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion and creating equal opportunity for all.
  - 3) **Achieving a Sustainable Economy** Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them, and efficient resource use is incentivised.
  - 4) **Using Sound Science Responsibly** Ensuring policy is developed and implemented based on strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

- 5) **Promoting Good Governance** Actively promoting effective, participative systems of governance in all levels of society, engaging people's creativity, energy and diversity.

1.12 In looking to regulate the development and use of land in the public interest, planning is key to achieving sustainable development by promoting environmental, economic and social objectives together over time. The revised National Planning Policy Framework (NPPF) (MHCLG (Ministry for Housing Communities and Local Government), February 2019) defines the purpose of planning as follows:

- **Economic:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- **Social:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- **Environmental:** to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

### **Strategic policies**

1.13 The National Planning Policy Framework (NPPF) 2018, states that strategic policies are required for the area of each local planning authority should include those policies, and strategic site allocations, necessary to provide:

- a) an overall strategy for the pattern and scale of development.
- b) the homes and workplaces needed, including affordable housing.
- c) appropriate retail, leisure and other commercial development.
- d) infrastructure for transport, telecommunications, security, waste management,
- e) water supply, wastewater, flood risk and coastal change management, and the
- f) provision of minerals and energy (including heat).
- g) community facilities (such as health, education and cultural infrastructure); and
- h) climate change mitigation and adaptation, and conservation and enhancement

i) of the natural, built and historic environment, including landscape and green infrastructure.

1.14 It further states that:

*Plans should make explicit which policies are 'strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any local policies that may be needed.*

### 3 Appraisal method

3.1 The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of the new Local Plan is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended. Several guidance documents have been issued in relation to SA/SEA and the methodologies outlined in these have been used where still applicable:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister (November 2005)
- Practical Guide to the SEA Directive, Office of the Deputy Prime Minister (September 2005).
- Sustainability Appraisal Planning Policy Manual, Planning Advisory Service (2009); and
- Sustainability Appraisal: advice note, Planning Advisory Service (2010).

Figure 12: SA scoring matrix against the SA/SEA Objectives

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

Figure 13: The effect of the policy (time span)

The effect	Time span
Short term	1-5 years
Medium term	5-10 years
Long term	10+ years

Figure 14: SA objectives

Sustainability objectives		SEA Topic requirements
SO1	<b>Air quality:</b> To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Air Human Health Population
SO2	<b>Biodiversity:</b> To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	Biodiversity Flora Fauna
SO3	<b>Land and soil condition and pollutants:</b> To conserve Merton's geodiversity and protect soils from development and over intensive use.	Soil Landscape Human Health Biodiversity Flora Fauna
SO4	<b>Sustainable land use:</b> To make the best and most efficient use of land to support sustainable patterns and forms of development.	Landscape
SO5	<b>Heritage (including architectural and archaeological heritage):</b> To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Cultural heritage, including architectural and archaeological heritage.
SO6	<b>Flood risk management:</b> To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Water Climate Factors Human health
SO7	<b>Climate change:</b> To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Climate Factors Material assets
SO8	<b>Noise and vibration:</b> To minimise noise, vibration levels and disruption to people and communities.	Human Health
SO9	<b>Water quality:</b> To protect and enhance Merton's water bodies.	Water Human Health Flora Fauna
SO10	<b>Water consumption:</b> Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Water Human

SO11	<b>Open space and nature:</b> To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	Biodiversity Flora Fauna Climate Factors Soil Landscape
SO12	<b>Sustainable transport:</b> To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	Population
SO13	<b>Energy use:</b> To improve energy efficiency in new developments and increase renewable energy supply / provision.	Climate Factors Material Assets
SO14	<b>Health and wellbeing:</b> To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Human Health Population
SO15	<b>Housing:</b> To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.	Human Health Population Material Assets
SO16	<b>Safe environments:</b> To contribute to safe and secure environments for all people including the 9 Protected Characteristics.	Human Health Population
SO17	<b>Population demand and growth:</b> To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.	Human Health Population Material Assets
SO18	<b>Social inclusion and cohesion:</b> To ensure Merton has socially integrated communities which are strong, resilient and inclusive.	Human Health Population
SO19	<b>Design:</b> To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.	Human Health Population Air Climate Factors Landscape
SO20	<b>Local employment:</b> To develop and maintain a healthy labour market.	Human Health Population Material assets
SO21	<b>Education and skills:</b> To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people	Population Human Health

	with disabilities and Black Asian and Minority Ethnic groups.	Material assets
SO22	<p><b>Economic growth:</b></p> <p>To increase the vitality and viability of existing town centres, local centres and parades</p> <p>To ensure that there is a mixed of business spaces including, affordable spaces in Merton.</p>	<p>Population</p> <p>Human Health</p> <p>Material assets</p>

## 4 Appraisal of planning policies

4.1 This section sets out the ‘likely significant effects’, both positive and negative, identified in the appraisal of the objectives, policies and reasonable alternatives. There have been some minor changes to the draft Plan since the last consultation. The changes provide clarity and/or changed to be more succinct wording (or ‘plain English’). Other changes have been influenced by findings and recommendations of evidence studies/reports carried out in accordance with guidelines and/or statutory requirements. These changes do not change direction of the policy and are more importantly, in line with national and regional planning policies.

4.2 Government guidance on Sustainability Appraisals states that:

*‘The sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects. Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the plan that are not significant will not require further sustainability appraisal work.’*

4.3 The SEA Directive states:

*‘An environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated’ (Article 5(1)).*

4.4 The Local Plan contains development policies, which will be used in the determining planning applications in

Merton. An assessment of the Plan policies has been carried out against the SA (Sustainability Appraisal) framework. As a requirement of the NPPF, the Local Plan has strategic policies, which are explicitly identified in the Local Plan in line with the NPPF. The NPPF, states further that these should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Additionally, strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

4.5 Strategic policies are required for the area of each local planning authority should include those policies, and strategic site allocations, necessary to provide:

- a) an overall strategy for the pattern and scale of development.
- b) the homes and workplaces needed, including affordable housing.
- c) appropriate retail, leisure and other commercial development.
- d) infrastructure for transport, telecommunications, security, waste management,
- e) water supply, wastewater, flood risk and coastal change management, and the
- f) provision of minerals and energy (including heat).
- g) community facilities (such as health, education and cultural infrastructure); and
- h) climate change mitigation and adaptation, and conservation and enhancement
- i) of the natural, built and historic environment, including landscape and green infrastructure.

Figure 15: Climate change policies

Policy	Sustainability Objectives																				The effect of the policy				
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term	
Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change	Light Green	Light Green	Light Green			Light Green	Dark Green				Light Green		Dark Green	Light Green		Light Green			Light Green				Light Green	permanent	Long
Policy CC2.2 Minimising greenhouse gas emissions).	Light Green	Light Green	Light Green				Dark Green					Light Green	Dark Green	Light Green		Light Green			Light Green				Light Green	Permanent	Long
Policy CC2.3 Minimising energy use	Light Green	Light Green	Light Green			Light Green	Dark Green						Dark Green	Light Green	Light Green	Light Green			Light Green				Light Green	Permanent	Long
Policy CC2.4 Low carbon energy	Light Green	Light Green					Dark Green						Dark Green	Light Green	Light Green				Light Green				Light Green	Permanent	Long
Policy CC2.5 Minimising waste and promoting a circular economy.	Light Green	Light Green	Light Green			Light Green	Dark Green						Dark Green						Light Green	Light Green	Light Green	Light Green	Light Green	Permanent	Long
Policy CC2.6 Sustainable Design Standards	Light Green					Light Green	Dark Green						Dark Green	Light Green	Light Green				Light Green				Light Green	Permanent	Long

## Appraisal comments

- 4.6 Policy CC2.3 Minimising energy use, Policy CC2.6 Sustainable Design Standards and CC2.4 Low carbon energy policies; would facilitate the development of energy efficient buildings. Increased energy efficiency of new homes, and retrospective improvements of existing homes, would help to reduce fuel cost and the risk of fuel poverty by making homes cheaper to run. More efficient developments would therefore contribute to improvements in local air quality and contribute to climate change mitigation and adaptation.
- 4.7 The policy supports the adoption of less polluting energy techniques, promoting low carbon and renewable energy sources. This policy outlines the need to identify and establish future energy needs in opportunity areas, town centres and other significant developments to build resilience and ensure capacity is managed. Energy masterplans offer several benefits, ensuring opportunities for energy efficiency in new developments are identified at the first stages.
- 4.8 Policy CC2.5 Minimising waste and promoting a circular economy the policy encourages a reduction in waste generation and maximises re-use. This reduction would result in less vehicles required to transport raw materials and waste, which would positively impact local air quality by reducing associated carbon emissions and reduce local noise disturbance associated with transport and waste processing.
- 4.9 The policies perform strongly against a number environmental SA objective as well social SA objectives.

Figure 16: Neighbourhood policies (sub areas)

Policy	Policy aim	Sustainability Objectives.																				The effect of the policy			
		S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term
Policy N3 1Colliers Wood	To designate Colliers Wood as a District Centre and provide policy and site allocations appropriate to its setting.																							Permanent	Long
Policy N.4 1Mitcham	To support development in Mitcham that enhances jobs and services for local people, is well designed and provides homes on upper floors.																							Permanent	Long

Policy N5.1 Morden	The delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes intensification and comprehensive development within the Morden Regeneration Zone.	+			+	+		+			+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
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Policy N9 Wimbledon	To support Wimbledon, thrive as the borough's major centre.	+	+		+	+	+		+			+	++	?	++	+	+	+	+	+	+	+	+	++	Permanent	Long
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### Assessment comments.

- 4.10 Colliers Wood neighbourhood policy aims to designate Colliers Wood as a District Centre and provide policy and site allocations appropriate to its setting with consideration of its historic environment and the flooding issues in the area. The policy recognises the need for more homes and job opportunities in an area with deprivation. The policy performs well against the SA objectives.
- 4.11 Mitcham neighbourhood policy aims to support development in Mitcham that enhances jobs and services for local people, is well designed and provides homes including affordable in an area with high levels of deprivation and need. The policy performs well against the SA Objectives. The policy with other polices in the local plan should assist in improve the neighbourhood and tackle the inequalities in the neighbourhood.
- 4.12 Morden neighbourhood policy seek to deliver a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes intensification and comprehensive development within the Morden Regeneration Zone. The regeneration of the town centre will provide new homes and job/ business opportunities for the neighbourhood. The neighbourhood like Mitcham, has issues of depravation, granted not at the same levels but there is need. The policy recognises its historic assets and the need to improve the high street (London Road), the main street running through Morden town centre. The policy with other in the local plan ensures development is sympathetic and sustainable.
- 4.13 The Raynes Park neighbourhood policy seeks to support development in Raynes Park and surrounds commensurate with its character and setting. The policy performs well against the SA Objective. This policy with other policy in the Local Plan, for example design policy should ensure that Raynes Park keeps its distinctive character well delivering much needed homes and support businesses.

- 4.14 The Wimbledon neighbourhood policy seeks to support Wimbledon, thrive as the borough's major centre within in Merton's Opportunity Area and a leading key town centre that is required to deliver new homes and support business and more importantly perform as a Major town centre. The policy performs well against the SA Objectives.
- 4.15 The South Wimbledon Policy seeks to create a new local town centre at South Wimbledon and set out its role as a new local centre. The policy recognises its historical assets, its role in the OA (Opportunity Area) and its need to improve inequalities in the area by delivering news homes and supporting businesses.

Figure 17: Health and wellbeing policies

Policy	Sustainability objectives																				The effect of the policy				
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium/long term	
Strategic policy HW10.1 Health (including mental health) and Wellbeing.	+						+				+	+	+	++	+	+	+	+	+	+	+	+	+	Permanent	long
Policy HW10.2: Delivering healthy places.	+			+			+	+			+	+	+	++	+	++	+	+	+	+	+	+	+	Permanent	long

**Appraisal comments:**

4.16 A healthy place is somewhere that promotes good mental health and wellbeing, makes healthy choices easier, and protects people from harm. These are all affected by how we interact with the streets, buildings, green spaces, community spaces and social connections that make up our neighbourhoods. The health and wellbeing policies with other polices such as design polices, green infrastructure seek to create healthy places.

- 4.17 The health and wellbeing policies seek to improve the health (including mental health) and wellbeing of Merton's residents. The strategic policy *HW10.1 Health (including mental health) and Wellbeing*. Clearly, sets out the health priorities and approaches to be taken to improve health inequalities in partnership with key bodies. Policy HW10.2: *Delivering healthy places* sets out the role that development proposals will play in improve health and wellbeing, for example in areas of deprivation, it sets out the management and monitoring of fast-food establishments proposal in Merton especially those near schools.
- 4.18 The health and wellbeing policies would support individual access to healthier choices and places. It promotes a number of design approaches that encourages health and greener environments such as Healthy Streets Approach, dementia friendly design and 20 Minutes Neighbourhoods. The polices enables more physical activity, by facilitating active sustainable forms of transport like walking and cycling. All contributing to improved physical and mental health and wellbeing. The policies drive improvements to health, indirectly, will improve economic prosperity and improve income inequalities, Furthermore, in the wider context reduce the financial burden and pressure on the National Health Service (NHS); plus, associated costs from loss of productivity the UK economy.
- 4.19 Healthy streets, 20 Minutes Neighbourhoods and other approaches mentioned in the policies can promote an attractive environment, which encourages a sense of place. Accessibility and connectivity would be positively affected by the policies, particularly through the Healthy Street Approach which promotes high quality walking infrastructure, increasing access to the wider public transport network whilst facilitating more active modes of transport. The policies will have positive effects on air quality and climate change through the promotion of Healthy Streets to reduce private vehicle use and promote active travel. The polices perfume well against a number SA Objective including social objectives

Figure 18: Housing policies

Policy	Sustainability Objectives																				The effect of the policy			
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term
Strategic Policy H11.1: Housing Choice				Green										Light Green	Green	Light Green	Green	Green	Green	Light Green	Light Green	Light Green	Permanent	Long
Strategic Policy H11.2: Housing Provision				Green								Light Green	Light Green	Light Green	Green	Light Green	Light Green	Permanent	Long					
Policy 11.3 Housing Mix				Green									Light Green	Light Green	Green	Light Green	Green			Light Green	Light Green	Light Green	Permanent	Long
Policy H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.	Light Green		Light Green	Green								Light Green	Light Green	Light Green	Green	Light Green	Light Green	Light Green		Light Green	Light Green	Light Green	Permanent	long
Policy H11.5	Light Green			Green								Light Green	Light Green	Light Green	Green	Light Green	Light Green	Permanent	Long					



- 4.22 Rates of households in temporary accommodation in Merton are lower than the London average with 1.9 households per 1000. There are currently 260 children in temporary household accommodation in Merton which is the lowest rate in London<sup>3</sup>. Although Merton's levels of homelessness and use of temporary accommodation is low, homelessness applications due to evictions are expected to rise following the ending of the evictions moratorium.
- 4.23 Against this backdrop, the housing policies supports a range of interventions to unlock development and will help to facilitate the delivery of much needed housing and choices. The emphasis on redeveloping brownfield sites, promoting small sites development and regeneration will help to ensure site capacity is optimised to help meet housing delivery targets. Measures to support housing delivery is likely to have number of wider economic and social benefits.
- 4.24 The housing policies emphasises the importance of design, including the provision of amenity areas and the relationship between new residential areas and surrounding developments, including supporting connectivity. By supporting high quality design which include shared open spaces, public realm and active transport infrastructure, policy *H11.2: Housing Provision* would have positive effects on the design objective. It also considers inclusive design, looking at the needs of a variety of groups to ensure housing provision supports them.
- 4.25 Strategic Policy *H11.1: Housing Choice*, Policy *H11.2: Housing Provision*, Policy *H11.3 Housing Mix* and other housing policies support the delivery of a range of housing types to improve resident choice and directly meet Merton's housing need. This would help increase the range of housing available on the market and could include more specialist housing to meet particular needs, such as those with health conditions or disability (Policy *H4.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system*).
- 4.26 New homes are required to conform to high design standards, and therefore the policies would help to reduce potential health risks such as damp, mould and cold. New homes tend to be more energy efficient and therefore issues such as fuel poverty would be reduced. The policies would also help facilitate regeneration in the local area, delivering important physical and social infrastructure.

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<sup>3</sup> [https://lginform.local.gov.uk/reports/lqastandard?mod-metric=12891&mod-area=E09000024&mod-group=AllBoroughInRegion\\_London&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lqastandard?mod-metric=12891&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup)

4.27 All the housing policies support improving health (including mental health) and wellbeing, contribute to the local economic growth, education and skills and local employment. It is expected that the policy would have positive impacts on sustainable land-use, by helping to ensure that high densities do not result in adverse impacts for diverse groups of people. The housing policies perform well against social and economic SA Objectives.

Figure 19: Design policies

Policy	Sustainability Objectives																						The effect of the policy	
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term
Strategic Policy LP D12.1 Delivering well designed and resilient neighbourhoods	Light Green	Light Green	Light Green	White	Light Green	White	Light Green	Dark Green	White	White	Light Green	Permanent	Long											
Policy D12.2 Urban design	Light Green	Light Green	Light Green	White	White	Light Green	White	White	White	White	Light Green	Dark Green	White	Light Green	Light Green	Permanent	Medium/long							
Policy D12.3 Ensuring high quality design for all developments	Light Green	Light Green	Light Green	Light Green	White	Light Green	Light Green	Light Green	White	White	White	Light Green	Dark Green	White	White	Light Green	Permanent	Medium/long						



neighbourhood conditions and transport routes, all of which shape the social, economic and environmental conditions for which good health is dependent. Within urban areas, the imaginative integration of built and natural features can help to create healthy and greener environments which are unique and assist for people to lead varied and healthy lives.

- 4.30 Developments in the borough are required to meet the highest standards of design, function and construction and help contribute to a net-zero carbon and climate-resilient future. The design policies seek to ensure that development proposals respect and positively respond to their context, townscape, landscape and public realm to strengthen Merton's character. Successful neighbourhoods are much more than just buildings. Historic environments and existing communities all contribute to successful places, and as such must be considered when designing. Delivering sustainable neighbourhoods is as important as delivering the homes themselves. Policy D12.3 Ensuring high quality design for all developments seek to ensure that all development no matter what type consider the impact on the environment and how people experience the development and how the development responds to its context. With Policy D12.5 Managing heritage assets places an importance on Merton heritage assets and recognises the historical significance
- 4.31 Policy D12.2 Urban design acknowledges that well-designed places create a keen sense of community and improve the social and emotional wellbeing of those who use it and ensure local resilience to the impacts of climate change such as flooding (from all sources), overheating and subsidence. The policy drives for the creation of inclusive, sustainable, efficient and high-quality design and layout of the urban and suburban environment found in Merton. The design policies perform well across the SA Objectives.

Figure 20: Economy polices.

Policy	Sustainability Objectives																				The effect of the policy			
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term
Policy Ec13.1: Promoting economic growth and successful high streets (formerly Economic Development)	Light Green	Light Green		Light Green			Light Green				Light Green	Light Green		Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Long
Policy Ec 13.2: Business locations in Merton (Formerly Employment areas in Merton)	Light Green			Dark Green								Light Green		Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Long
Policy EC13.3 Protection of scattered employment sites	Light Green			Dark Green				Light Green						Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Medium/Long
Policy E13.4 Local Employment Opportunities				Dark Green										Light Green		Light Green	Light Green	Light Green		Dark Green	Dark Green	Dark Green	Permanent	Long
Policy TC13.5	Light Green			Dark Green			Light Green									Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Dark Green	Permanent	Long



Figure 21: Infrastructure policies

Policy	Sustainability Objectives																					The effect of the policy		
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term
Strategic policy IN14.1 Supporting Infrastructure							Light Green					Light Green	Dark Green	Light Green		Light Green	Light Green	Light Green	Permanent	Long				
Policy IN14.2 Social and Community Infrastructure							Light Green						Dark Green			Light Green	Light Green	Light Green			Dark Green		Permanent	Medium/long
Policy IN14.3 Sport and Recreation	Light Green	Light Green	Light Green				Light Green				Light Green		Dark Green			Light Green	Light Green	Light Green			Light Green		Permanent	Medium/long
Strategic Policy W14.4 Waste Management	Light Green	Light Green	Light Green				Light Green							Light Green		Light Green	Light Green			Light Green		Light Green	Permanent	Medium/long

## Appraisal comments

- 4.34 Creating healthy environment, improving health and wellbeing and creating growth it is crucial that communities (residents and business) have the right infrastructure. The infrastructure policies would ensure that developments have a positive impact for residents by supporting the needs of the local community. The sharing of community facilities would ensure local groups, who often have small budgets, have affordable and appropriate space for their needs. The provision of educational facilities would ensure sufficient school places are provided for local children. This would reduce the need for young people to travel long distances to school, which can be a stressful and expensive experience. It would equally contribute to wider air quality improvements by reducing vehicle use.
- 4.35 Strategic policy IN14.1 Supporting Infrastructure and Policy IN14.2 Social and Community Infrastructure would support the provision of accessible healthcare facilities benefits those with mobility issues and/or long-term health conditions. Increasing the capacity of health care facilities and considering closely where demand is, and what types of services are needed, would ensure these services are of a high quality and meet the needs of their patients. Furthermore, the policy would ensure the improvement and management of all types of education facilities from nursery schools to further education, which are accessible and affordable. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, residents with a disability or existing health conditions. The policy strongly encourages developer to engage and council partnership working with providers such as health service and education departments. partners to ensure the right provision is delivered.
- 4.36 Strategic policy IN14.1 Supporting Infrastructure and Policy IN14.2 Social and Community Infrastructure support equal provision of play spaces, seek to increase provision in area of need and would also have a highly positive effect to help reduce the health problems in deprived areas.
- 4.37 Policy IN14.3 Sport and Recreation supports the provision and enhancement of sports and recreational facilities in Merton and would contribute significantly to wider health improvements by promoting increased physical activities. The policy would support the delivery of a wide range of sports and activities to suits the interests and lifestyles of residents. Inequalities around access to these services would also be addressed through the application of Sport England Standards, to provide equality and reduce health problems in deprived areas. Active lifestyles will have a profound positive effect on life expectancy and can provide contribute to improved mental health and wellbeing. Ensuring sporting facilities are appropriately connected to pedestrian and cycling networks would encourage people to continue physical activity outside of a formal setting and reduce traffic congestion. This would offer

benefits to the wider community, not just users of these facilities. The policy also identifies the need to manage lighting appropriately to ensure there is no harm on the local community and biodiversity. The use of playing fields could also provide larger, green spaces across the city, increasing natural capital and greenery across London. However, any biodiversity would need to be protected in these areas and a balance assured between recreational use and wildlife.

4.38 The infrastructure policies perform well against a number of social and environmental objectives.

Figure 22: Green infrastructure policies

Policy	Sustainability Objectives																						The effect of the policy	
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term
Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation																							Permanent	Long
Policy O15.2 Open Space and Green Infrastructure																							Permanent	long



green and blue spaces are widely known, from improving physical health, mental health and wellbeing to helping tackling climate change and improve biodiversity.

- 4.40 Green Infrastructure policies support improving health (including mental health) and wellbeing and the wider benefits of green environments, for example education and access to the natural world. The promotion of the healthy and safe green environment approaches would deliver further environmental benefits, contributing to improved air quality, encouraging and enabling walking and cycling. The Green Infrastructure policies ensures that new areas of green infrastructure could be incorporated into developments which will encourage biodiversity and improve access for residents to functional public realm space. Furthermore, would ensure that new green space would also contribute positively to the character and townscape of the borough.
- 4.41 *Policy O15.2 Open Space and Green Infrastructure and, policy O15.2 Open Space and Green Infrastructure* policies places a strong emphasis on the protection and enhancement. While *Policy O15.3 Biodiversity and Access to Nature* ensures the protection of the species and habitats within Merton's green and blue networks and increase wider access to biodiversity in Merton.
- 4.42 *Policy O15.5 Urban Greening* ensures that new developments incorporate urban greening, green infrastructure which will improve across the borough and help to mitigate the impacts of climate change such as overheating, flooding and contribute reducing urban island effect. Similarly, green measures such as green walls and planting of trees (Policy O8.4 Protection of Trees) can absorb noise and vibrations, thereby reducing local noise levels, reduce flood incidents, improve water quality and improve soil quality. Where green infrastructure measures include harvesting and redirecting storm water, and/or using green roofs, overflow would also be controlled, helping to reduce discharges to surface and ground waters. The Green Infrastructure polices perform will against a number of SA Objectives.

Figure 23: Blue infrastructure polices.

Policy	Sustainability Objectives																				The effect of the policy				
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term	
Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage	Light Green	Light Green	Light Green	Light Green		Dark Green	Light Green		Light Green		Light Green			Light Green	Light Green				Light Green				Light Green	Permanent	Long
Policy F15.8 Managing Local Flooding	Light Green	Light Green	Light Green	Light Green		Dark Green	Light Green	Light Green	Dark Green	Light Green	Light Green			Light Green	Light Green	Light Green		Light Green	Light Green				Light Green	Permanent	Long
Policy F15.9 Sustainable drainage systems (SUDS)	Light Green	Dark Green	Dark Green	Light Green		Dark Green			Light Green		Light Green			Light Green	Light Green	Light Green			Light Green		Light Green		Light Green	Permanent	Long

**Appraisal comments**

4.43 The provision of housing and other development, which is, resilient and allows residents to remain safe and comfortable during flood events will be an important aspect of managing future climate change. Policy *F15.8 Managing Local Flood* would minimise the wide scale damage, reduce the potential risk of life, protect vital

infrastructure, and associated interruptions and delays to economic activity that flooding events can cause. Protection from the potential impacts of increased development on land would be managed appropriately to ensure the biodiversity of the river is protected alongside continued development and recreational use.

4.44 Policy *F15.9 Sustainable drainage systems (SUDS)* requires minimisation and mitigation of surface run-off, both as part of development proposals and the retrofitting existing buildings, will be important for building resilience for example the installation of blue and green roofs, porous surfaces and retention ponds. Effectively managing surface water run-off would minimise the risk of potential surface water contamination, soil degradation and erosion and improve overall water quality. By focussing on using sustainable features to manage water run-off, aspects of the natural environment will be protected and enhanced. New areas of green infrastructure could also be incorporated into developments which will encourage biodiversity and improve access for residents to functional public realm space. It would also contribute positively to the character and townscape of a local area.

Figure 24: Air quality and pollutants policies

Policy	Sustainability Objectives																				The effect of the policy				
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term	
Policy P15.10 Improving Air Quality and Minimising Pollution	++	+		+		+	+	++	++		+			++	+					+				Permanent	Long

## Appraisal assessment.

- 4.45 Although levels of PM10 in the borough are better than the London average they are higher than all our South West London neighbours. Areas of high air pollution in Merton are almost entirely along main roads and associated with traffic and congestion. Poor air quality is not evenly distributed across Merton and more vulnerable communities are often disproportionately affected by air quality impacts. Improvements to air quality would therefore help to improve the health of the population, particularly vulnerable groups such as young children, elderly people and those with respiratory conditions.
- 4.46 Improvements to health would also facilitate wider economic benefits by reducing healthcare costs associated with treating respiratory conditions and premature deaths. Improvements to air quality would help to alleviate the impacts of climate change and the heat island effect. The policy supports the environmental and social sustainability objectives. The policy performs well against a number of SA Objectives and very strongly against the environmental SA Objectives.

Figure 25: Sustainable Transport

Policy	Sustainability Objectives																				The effect of the			
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO1	SO1	SO1	SO1	SO1	SO1	SO1	SO1	SO1	SO2	SO2	SO2	Temporary /Permanent	Short/medium /Long term	
Strategic Policy T16.1 Sustainable Travel	Light Green	Light Green	Light Green	Light Green			Light Green					Dark Green		Dark Green		Light Green	Light Green		Light Green	Light Green		Light Green	Permanent	Long
Policy T16.2 Prioritising active travel choices.	Light Green	Light Green		Light Green			Light Green	Light Green			Light Green	Dark Green	Light Green	Dark Green	Light Green	Light Green	Light Green		Light Green	Light Green		Light Green	Permanent	Long
Policy T16.3	Light Green	Light Green				Light Green	Light Green					Dark Green	Light Green	Light Green		Light Green	Light Green		Light Green	Light Green		Light Green	Permanent	Long



exercise, reduced air pollution and carbon emissions, and less vehicle related noise disturbance.

- 4.49 By promoting and supporting more attractive transport options, in particular active transport options, such as cycling and walking, may improve landscaping which could indirectly benefit townscape and character, and alleviate the urban heat island effect. Increased connectivity would limit reliability on car trips, thereby reducing associated poor air quality and excess noise, whilst promoting affordable transport options that reduce socio-economic inequalities. Improving environmental conditions and air quality is particularly important for higher risk groups such as residents with existing respiratory conditions, young children, older people and pregnant women. T16.2 Prioritising active travel choices policy would also increase access to wider environmental infrastructure which could also provide positive economic benefits by supporting housing growth and access to opportunities such as employment and education.
- 4.50 Policy T16.3 Managing the Transport Impacts of Development policy will assess and mitigate transport impacts for new developments would have positive effects on sustainable land use, as it promotes the use of existing transport networks, both close to the development. The policy also supports the delivery of goods and services through more efficient and sustainable freight movement. This ensures businesses receive the goods and services they need to prosper, thus enhancing economic productivity in the long term. Freight services indirectly support a range of supply chains and business networks that underpin Merton's economic activity and employment, therefore having a positive effect on the borough's economic growth. Delivery services also provide employment for workers across different skills, and this policy could therefore protect and facilitate jobs and growth in this sector.
- 4.51 Incorporating the Healthy Street Approach in the sustainable transport policies would bring more benefits that meet a number of SA objectives – environmental and social.

## 5 Appraisal of the site allocations and Policies Map

- 5.1 The Site Allocations and Policy Map will help to deliver the borough's spatial vision and strategy objectives. They are intended to have a positive impact across all communities. They can:
- help provide and protect employment land to provide jobs in the borough
  - provide community facilities and infrastructure for local communities, for example through the incorporation of

- open space, play facilities, health facilities and other essential service for neighbourhoods and areas
- help reduce the need to travel by car by encouraging sustainable transport
- create healthy and safe environments such as provide well designed mix of housing (including affordable and supported housing) to meet local needs and Merton's growing and aging population
- promote active living for Merton's diverse communities

5.2 It is important to note that site allocations comprise one part of the policy framework. Whilst they will set out appropriate uses for a site and considerations; site allocations will not normally deal with the detail precise requirements (e.g. the number of homes, or the number of storeys that will be built or the design and form of the building) and its relationship and/or impact to the environment including the historic environment. These matters are detailed by the planning application stage. Other planning policy documents will be used in determining planning applications such as, the London Plan, NPPF and South London Waste Plan; all of which have been subject to an SA/SEA and of course the new Local Plan policies once adopted, while play its part.

5.3 Overall, the site allocations are found to be favourable against the sustainability objectives. Where, the assessment has highlighted an issue, these will have to be addressed as part of any submitted development proposal, ensuring the development is sustainable and would not have an adverse impact to the environmental, social or economic effects.

Figure 26: Colliers Wood site allocations assessed against the SA Objectives.

2Colliers Wood neighbourhood site allocations					
Site allocations	CW1: Baltic Close	CW2: Car Park South of Britannia Point	CW3: Colliers Wood Community Centre	CW4: Colliers Wood Station	CW5: Priory Retail Park
Site allocation use	Residential and commercial mixed-use scheme	Delivery of new homes as part of a mixed-use development. Residential on upper floors with any of the following on the ground floor (financial and professional services, food and drink, office, assembly, health/day centre) or other sui generis use that is a suitable mix right for a town centre.	Mixed-use community and residential.	Any of the following or a suitable mix of retail, financial and professional restaurant or café, hot food takeaway, drinking establishment, leisure/health centre, offices and residential on upper floors. The Post Office should be retained.	a suitable mix of town centre uses on the ground and lower floors (shops financial and professional services, food and drink, office, assembly, health/day centre or other sui generis use appropriate for a town centre), residential on upper floors and public space.
S01					
S02					
S03					
S04					
S05					
S06					
S07					
S08					
S09					
S010					

SO11					
SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 27: Mitcham site allocations assessed against the SA Objectives (site allocations Mi1-Mi5).

Mitcham neighbourhood site allocations					
Site ref:	Mi1: Benedict Wharf	Mi2: Birches Close	Mi3: Burn Bullock and Mitcham Cricket Pavilion	Mi4: Elm Nursery Car Park	Mi5: Land at Canons
Site allocation	Residential with some non-residential uses that are commensurate with a residential setting (for example small workshops, community uses etc.) and deliverable. Reallocation is dependent on there being no loss of waste management capacity within the South London Waste Plan area.	Healthcare with community and enabling residential development or residential if the existing services are relocated within an alternative healthcare facility in Mitcham.	Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green.  Use of the Burn Bullock building as non-residential uses with public access on the ground floor which could include business, service or community uses. Residential development may be acceptable on upper floors as enabling development.  Residential development on the car park to the rear of the site to enable community ownership and management of Mitcham Cricket Pavilion associated land and buildings.	Residential	Residential
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					

SO9					
SO10					
SO11					
SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 28: Mitcham site allocations assessed against the SA Objectives (site allocations Mi6-Mi10)

Mitcham neighbourhood site allocations

Site ref:	Mi6: 326 and 328 London Road	Mi7: 370 London Road	Mi8: 1 to 12 Majestic Way	Mi9: Former Mitcham Fire Station	Mi10: Mitcham Library
Site allocation	Residential if, the office and community functions are provided elsewhere locally. Residential use would be dependent on the office and community use being re-provided locally.	Mixed used non-residential (shops, services, offices, community on the ground floor and residential on upper floors.	Mixed use: retail, businesses, food and drink and community services (health centres, crèches, day nurseries, day centre on the ground floors, residential on upper floors.	A mix of uses which could include any of the following: community uses (Clinics, health centres, crèches, day nurseries, day centre), other community uses such as a cinema, gallery, theatre; residential, restaurant/café, office, drinking establishment or non-food retail.	Library to be kept and improved (either on site or closer to Mitcham town centre). The rest of the site considered for a suitable mix or any of community uses, office or residential.
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					

SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 29: Mitcham site allocations assessed against the SA Objectives (site allocations Mi11-Mi15)

Mitcham neighbourhood site allocations					
Site ref:	Mi11: Raleigh Gardens car park	Mi12: Sibthorpe Road Car Park	Mi13: 30 St Mark's Road	Mi14: United Westminster Schools site	Mi15 Taylor Road Day Centre
Site allocation	Residential	Town centre type uses including retail, food and drink, offices, works spaces, leisure, community services and residential on upper floors.	Residential.	publicly accessible sporting facilities enabled by residential development.	Mixed use community (Clinics, health centres, crèches, day nurseries, day centre) and residential or solely residential if the community service is provided elsewhere.
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					
SO14					

SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 30: Mitcham site allocations assessed against the SA Objectives (site allocations Mi11-Mi15)

Mitcham neighbourhood site allocations				
Site ref:	Mi16: Mitcham Gasworks Western Road	Mi17: White Hart Pub and back land London Road	Mi18: Wilson Hospital	Mi19 Worsfold House Church Road
Site allocation:	Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre).	Restaurant /cafe or public house or drinking establishment with associated car park with potential for residential development to enable the restoration and viable function of the White Hart.	Healthcare with community and enabling residential development. or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham.	A suitable mix of school and/or residential.
SA objective				
SO1				
SO2				
SO3				
SO4				
SO5				
SO6				
SO7				
SO8				

SO9				
SO10				
SO11				
SO12				
SO13				
SO14				
SO15				
SO16				
SO17				
SO18				
SO19				
SO20				
SO21				
SO22				

Figure 31: Morden site allocations assessed against the SA Objectives (sites Mo1 – Mo5)

Morden neighbourhood site allocations					
Site ref:	MO1: Chaucer Centre	Mo2: Farm Road Church	Mo3: Imperial Sports Ground Tooting and Mitcham Hub	Mo4: Morden Regeneration Zone	Mo5: Morden Road Clinic and Morden Hall Medical Centre
Site allocation	Mixed-use residential and community uses such as clinics, health centres, crèches, day nurseries, day centre or solely residential, subject to the existing training facility being provided on a suitable site elsewhere within the borough.	Residential.	Intensification of sporting activity on the wider Tooting and Mitcham Hub site may be supported by enabling development on this site subject to meeting planning policy, evidence and consultation. Any enabling development would be expected to directly fund long-term capital investment in sporting facilities on Tooting and Mitcham Hub	Mixed retail, office, commercial (including restaurants/cafes), community use (including health centre), transport infrastructure, public realm and residential.	Healthcare led mixed-use scheme with residential or solely residential if an NHS primary healthcare facility with similar or greater capacity is provided within Morden town centre.
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					

SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 32: Morden site allocations assessed against the SA Objectives (sites Mo1 – Mo5)

Morden neighbourhood site allocations		
Site ref:	Mo6: York Close Car	Mo7: Gifford House
Site allocation	Parking and residential or solely residential, if not needed for parking	Residential
SA objective		
SO1		
SO2		
SO3		
SO4		
SO5		
SO6		
SO7		
SO8		
SO9		
SO10		
SO11		
SO12		
SO13		
SO14		
SO15		
SO16		
SO17		
SO18		
SO19		
SO20		
SO21		
SO22		

Figure 33: Raynes Park site allocations (RP1- RP5) assessed against the SA Objectives.

Site ref.	RP1: Amity Grove Clinic.	RP2: 245 -247 Burlington Road.	RP3: Tesco, Burlington Road.	RP4: 80-86 Bushey Road.	RP5: All England Lawn Tennis Club Community Sports Ground 216 Grand Drive,
Site allocation.	Residential.	Commercial, business, service and community use appropriate to a residential area.	Comprehensive redevelopment of the site to keep the supermarket with the same floorspace as exists in a new, purpose-built unit and to optimise the rest of the site for delivering new homes, landscaping and access.	Site allocation: Residential-led mixed use development with potential for ground and lower floors commercial, business, services and local community uses appropriate to a residential area.	Tennis facilities connected with AELTC's operation of The Wimbledon Championships, the Wimbledon Junior Tennis Initiative, community tennis programmes with support for continued and long-term investment in the same. The site can be found in designated open space with sport and recreation use that are compatible with open space designation.
SA objectives					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					
SO14					

SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 34: Raynes Park site allocations (RP6- RP8) assessed against the SA Objectives.

Site ref.	RP6: Land at the former LESSA Sports Ground Grand Drive	RP7: Rainbow Industrial Estate Grand Drive	RP8: West Barnes Library
Site allocation.	Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered.	Employment led regeneration in line Rainbow Industrial Estate planning brief, including public realm improvements close to Raynes Park station. Proposed allocation to clarify the existing planning approach.	Library with residential on upper floors
SA objectives			
SO1			
SO2			
SO3			
SO4			
SO5			
SO6			
SO7			
SO8			
SO9			
SO10			
SO11			
SO12			
SO13			

SO14			
SO15			
SO16			
SO17			
SO18			
SO19			
SO20			
SO21			
SO22			

Figure 35: Wimbledon site allocations assessed against the SA Objectives (Wi1- Wi8)

Wimbledon neighbourhood site allocations							
Site allocation >>>	W1 Battle Close, North Road	Wi2: Broadway Car Park,	Wi3: All England Lawn Tennis Club	Wi5: Hartfield Road Car Park	Wi6; Highlands House, 165-171 The Broadway	Wi7: Rufus Business Centre	Wi8: South Wimbledon Station
<b>SA objectives</b>							
S01							
S02							
S03							
S04							
S05							
S06							
S07							
S08							
S09							
S010							
S011							
S012							
S013							
S014							
S015							
S016							
S017							
S018							
S019							
S020							
S021							
S022							

Figure 36: Wimbledon site allocations assessed against the SA Objectives (Wi9- Wi16)

Wimbledon neighbourhood site allocations

Site allocation >>>	Wi9: 28 St George's Road	Wi10: Prospect House, 30 St George's Road	Wi11: Victoria Crescent, 39-59 The Broadway	Wi12: Wimbledon Stadium and Volante Site	Wi13: 8-20 Worple Road and 20-26 St George's Road	Wi15: YMCA Wimbledon	Wi16: Centre Court Shopping Centre
<b>SA objectives</b>							
SO1							
SO2							
SO3							
SO4							
SO5							
SO6							
SO7							
SO8							
SO9							
SO10							
SO11							
SO12							
SO13							
SO14							
SO15							
SO16							
SO17							
SO18							
SO19							
SO20							
SO21							
SO22							

5.4 **Green infrastructure boundary changes** The Environment Partnership (TEP) was commissioned by the London Borough of Merton (the Council) to assess the borough's green and blue infrastructure, biodiversity and open spaces and provide evidence to support the base document to inform the preparation and implementation of the new Local Plan. [Merton Green Infrastructure Study 2020](#) assessed the quantity, accessibility, quality and value of open spaces throughout the borough and was carried out in line with national and London guidance and policies. The objectives of the Study were to:

- Evaluate the quantity, quality, value and accessibility of several types of open space and green infrastructure throughout the borough.
- Identify any specific needs or areas of deficiency in access to green and open space and nature conservation areas and how these deficiencies should be addressed.
- Determine the impact of projected population changes across the borough and housing intensifications in the identified growth areas and other small sites, on open spaces.
- Identify any areas of open space and nature conservation areas that are surplus to requirements, and in accordance with agreed criteria, any areas that have potential to be designated as Local Open Space and/or Metropolitan Open Land.
- Undertake a biodiversity assessment of the borough's Sites of Importance for Nature Conservation (SINCs) and identify any special protection green areas of local importance.
- Support the borough's health and wellbeing priorities as set out in Merton's Health and Wellbeing Strategy.
- Undertake consultation with user groups in the borough to figure out perceptions of Merton's open spaces and priorities for the future.

5.5 The Study is aligned with other evidence base documents including the Playing Pitch Strategy (2019) and the Health and Wellbeing Strategy (2019) and supports the preparation of the Infrastructure Delivery Plan (IDP). In turn, this will aid in the justification of future development contributions and the collection and spending of the Community Infrastructure Levy (CIL). Sites designated as MOL (Metropolitan Open Land), Open Space, SINC (Site of Importance for Nature Conservation) and Green Corridors have been reviewed and proposed boundary are informed by the recommendations of the Study, London Plan and NPPF definitions and criteria of each type of open space. Boundary changes have also been recommended for sites that have received planning permission and those that have been reviewed by the Future Merton and Greenspaces teams following Stage 2a consultation responses. All sites have been reviewed in line with the criteria set out in the Green Infrastructure Study 2020. Appendix C identify sites that have been recommended for boundary changes. In accordance with guidance on

Sustainability Appraisals these changes to the plan are not significant and will not require further sustainability appraisal work.

## 6 Mitigating adverse effects

- 6.1 The policies of the London Plan, the NPPF and their supporting documents will need to be taken into consideration when development proposals come forward for development; as well as the Local Plan policies once adopted. In combination all the planning policies aim to mitigate against any adverse impacts to the environment, social and economic objectives, which contribute to sustainable development. All planning policies at each level (national, regional and local) set of what mitigation measures are required and if, any assessment(s) are required to assess the potential impact such as environmental of a proposed development. Therefore, it is not necessary to have the same policy at local level as, all development proposals need to meet the requirements of national, regional and local planning policies and guidance.

### **Air Quality, Noise and Pollution**

- 6.2 The whole of borough is an AQMA (Air Quality Management Area) however, any development may result in an adverse impact because of demolition, construction and an increase in traffic. Therefore, an Air Quality Impact Assessment will be required for any development in areas that are identified in Merton's Air Quality Action Plan (AQAP) as an air quality focus area or if the type of development proposed may have an adverse impact or depending on the scale of the development for example the Morden town centre regeneration. Furthermore, we have adopted the London Plan's approach to Air Quality Positive and Neutral development. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been exploited, financial contributions to offset the impact of the development on air quality may be considered as a final intervention. The control of dust and emissions during construction and demolition will also need to be considered in the development proposals, reference should be made to Mayor's Supplementary Planning Guidance, Merton's Construction and Design Supplementary Planning Document (emerging) and Air Quality SPD (adopted 2021).

## **Climate Change and Energy**

- 6.3 The Council declared a Climate Emergency in 2019 and has adopted a Merton's Climate Strategy and Action Plan in response. Paragraph 149 of the NPPF 2019 and Paragraph 152 of the Draft NPPF 2021, *'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*
- 6.4 All development proposals will need to comply with national and regional planning documents and their support guidance in combination these documents seek to ensure that suitable mitigation is identified and applied as part of development proposals.

## **Transport**

- 6.5 Any development proposals are required to make neighbourhoods a well-connected place where walking, cycling and public transport are the modes of choice when planning all journeys, in accordance with the London Plan. The Council has adopted TfL's healthy streets approach, which puts people's health at the centre of how streets and public spaces are designed, managed and used. Developments will be expected to demonstrate how their proposals will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. New streets should respect and link to the local neighbourhood they serve and provide good connections to community facilities and shops, promote improved travel choice by creating an attractive, permeable, well designed and balanced environment.
- 6.6 Where a development proposal is likely to have a significant impact upon transport a Transport Assessment or Statement and other relevant documents including Travel Plans and Construction Management Plans will be required in accordance with TfL's Transport Assessment Guidance. Proposals for vehicular movement must be supported by appropriate traffic modelling, transport and assessment and travel plans and be in general compliance with transport policies, whilst aiming to achieve good vehicular permeability and convenience for residents.
- 6.7 The Transport Assessment or Statement will be required to identify if the transport impacts of a new development are

likely to be 'severe' which may lead to the permission being refused unless adequate mitigating measures can be provided to address any adverse transport impacts. Mitigation measures may include financial contributions towards or direct provision of walking and cycling facilities, public transport services and highways improvements. Designs and layouts for new streets or highways improvement schemes should be designed in accordance with the latest best practice guidance. The Transport Statement or Assessment will need to set out how, the development supports the Healthy Streets Approach and The Mayor's Vision Zero target for road safety.

### **Waste Management**

- 6.8 Any development will result in an increase in waste produced both in the construction and operation of the development. All development proposals will need to comply with planning policies (national and regional) relating to waste management, as well as the South London Waste Plan. New development will be required to provide integrated, well designed waste storage facilities that will include recycling facilities where appropriate. Construction Waste Management Plans will need to be submitted as part of proposals.

### **Water Resources, Water Quality and Flood plain**

- 6.9 Any development proposals within Flood Zone 2, Flood Zones 3a and 3b functional floodplain, which could result in a higher concentration of dwellings in the functional floodplain will need to have regard to NPPF, national Planning Policy Guidance, Merton's flood risk management documents such as the Strategic Flood Risk Assessment (2021), Surface water management plan. All proposals when mitigating against flooding (from all sources) will need to include climate change allowance and will need to make development flood resilient and resistant design. A Sustainable Drainage System (SUDS) strategy will need to be developed to provide on-site attenuation and manage surface water runoff.
- 6.10 Consideration should also be given to the potential for rainwater harvesting in line with the Mayor's drainage hierarchy. Any development coming forward will be subject to a Sequential Test, Exceptions Test and Site-Specific Flood Risk Assessment, which must have regard to Merton Strategic Flood Risk Assessment and Surface Water Management Plan. The need for additional sewerage capacity will need to be considered to address the increase in population.

### **Open Space and Biodiversity**

- 6.11 Where possible development proposals must offer an opportunity to improve the quality of provision and enhance the biodiversity of a site and surrounding neighbourhoods, through measures such as green corridors, ecological enhancement and urban greening. Again, any development proposal will need to have regard to the London Plan, NPPF as well as Merton's Green Infrastructure study (2020) and other green plans/strategies and health and wellbeing plans such as the Merton's Health and Wellbeing Strategy.
- 6.12 Merton's Habitat Regulation Assessment concluded that it was unlikely to be any significant impact on the European Sites namely Wimbledon Common and neighbouring Richmond Park.

# Appendices

## Appendix A: Baseline data.

### **Data limitations**

- 8.1 Information or data used to help explain current situations or trends change over time. However, this does not necessarily link cause and effect overtly and is limited in how they can explain why particular trends are occurring and the secondary effects of any changes. The data therefore acts as an indicator and 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 part of meeting the objective so may simplify the issues and interactions.
- 8.2 The 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. External bodies collect much of the data used in this report for example Office of National Statics (ONS) and the Greater London Authority (GLA). The spatial and temporal data collected and future changes to the methodology of the data collect are not within the control of Merton Council. It should be noted there are some gaps in the data collected, as not all information is consistently available. As part of the SA/SEA process a Scoping Report including baseline data. For this report, the Council has carried out a summary update of the baseline data.

### **Merton the place**

- 8.3 Merton is an outer London borough situated to the southwest of the capital. It borders with the London Boroughs of Wandsworth, Sutton, Kingston, Croydon and Lambeth. The borough is predominantly residential in character (42% of the area) but with variation in density and characteristics of development particularly between the east to west and north to south of the borough and associated economic and social differences.

Figure 37: Borough of Merton



8.4 Merton is the one of the smallest boroughs in London with an area of 37 square kilometres. Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in London. Around 18% of the borough's area is open space, compared to the 10% London average.

- 8.5 The quality and historical character of the borough reflects the number of high-quality heritage areas designated as Conservation Areas. The northern parts of the borough are characterised by tightly packed streets of late Victorian or Edwardian terraced housing around north Mitcham, Colliers Wood, South Wimbledon and Wimbledon Park and larger detached or semi-detached homes around Wimbledon.
- 8.6 The 1930's suburbia characterises large parts of the south and west of Merton with lower density semi-detached houses and short terraces with gardens, in tree lined roads with wide grass verges. These areas merge with the neighbouring boroughs of Sutton and Croydon. Within Merton there are a number of pockets of affluence and of, multiple deprivation. Although deprivation is mainly in the eastern side of the borough merging with Lambeth and Croydon, there are also some pockets in the west of the borough.

## Environment baseline data

### **Green infrastructure and biodiversity**

- 8.7 Within Merton, there is one Site of Special Scientific Interest (SSSI) designation, Wimbledon Common. Wimbledon Common extends across the borough boundaries of Merton and Wandsworth. As such Wimbledon Common is divided into five units, 3 of which are in Merton and 2 in in the borough of Wandsworth. As well as it SSSI designation, Wimbledon is also designated as a Special Area of Conservation (SAC), SSSI and Water Framework Directive (WFD). Appendix 1 Maps: identifies the SSSI and SAC.
- 8.8 The common measures 351.38 ha and is found 1.5km to the northwest of Wimbledon town centre and 1km of Richmond Park. The majority of the SAC is found within Merton and a smaller area within Putney Heath (London Borough of Wandsworth).
- 8.9 The west of Wimbledon Common SAC also borders the Royal Borough of Kingston upon Thames and consists of the following general habitat types:
- Inland water bodies (standing water, running water) (1%)
  - Bogs Marshes Water fringed vegetation. Fens (0.5%)
  - Heath Scrub Maquis and garrigue *Phygrana* (5%)
  - Dry grassland Steppes (45%)

- Improved grassland (3.5%)
- Broad-leaved deciduous woodland (45%)

8.10 Wimbledon Common is one of the largest areas of uncultivated land in London and sits in the Thames Valley Natural Character Area. The underlying soils are mostly sands, gravel and silty clays which give rise to poorly drained, nutrient poor and acid conditions.

8.11 Notified features of Wimbledon Common are:

- *Calluna vulgaris* (commonly known as Heather) - *Ulex minor* heath.
- *Erica tetralix* - *Sphagnum compactum* wet heath
- *Molinia caerulea* - *Potentilla erecta* mire
- *Festuca ovina* - *Agrostis capillaris* - *Rumex acetosella* grassland
- *Festuca ovina* - *Agrostis capillaris* - *Galium saxatile* grassland
- *Quercus robur* - *Pteridium aquilinum* - *Rubus fruticosus* woodland

8.12 Other key environmental assets of Wimbledon Common:

- London Wildlife Trust managed Local Nature Reserve Fishpond Wood (managed
- Largest area of wet heath in London, areas of dry heath and one of London's very few sphagnum bogs
- High ground hosts an ancient tumulus and an ancient monument, Caesar's Camp, can be seen near the Royal Wimbledon Golf Course.

8.13 Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for the stag beetle, *Lucanus cervus*. The stag beetle is listed as an Annex II species in the Habitats Directive and is a primary reason for the designation of this site. Wimbledon Common also supports a number of other scarce invertebrate species associated with decaying timber.

8.14 The following Annex I habitats are present as a qualifying feature; however, these are not a primary reason for designation of this site.

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

Figure 38: Wimbledon Common SSSI unit review

<i>Unit name (unit number)</i>	<i>Condition</i>	Condition Threat Risk	Habitat	Area (ha)
<i>Putney heath (1)</i>	<i>Unfavourable- Recovering</i>	Medium	Dwarf Shrub Heath - Lowland	64.2291
<i>Hookhamslade (2)</i>	<i>Unfavourable – Recovering</i>	Medium	Acid Grassland - Lowland	129.3094
<i>Wandsworth woodland (6)</i>	<i>Unfavourable – Recovering</i>	Medium	Broadleaved, Mixed and Yew Woodland - Lowland	44.8322
<i>Merton woodland (8)</i>	<i>Unfavourable – Recovering.</i>	Medium	Broadleaved, Mixed and Yew Woodland - Lowland	95.395
<i>Southern Grassland/Heathland (9)</i>	<i>Unfavourable - No change</i>	No identified Condition Threat	Dwarf Shrub Heath - Lowland	17.6173

Source: Natural England (May 2018)

## Nature Conservation and open space

8.15 As well as Wimbledon Common (SSSI (Sites of Special Scientific Interest)), Merton has other areas that are designated for their importance to nature conservation, they are as follows:

Figure 39: Nature Conservation in Merton

Sites of Metropolitan Importance for Nature Conservation	5
Site of Borough (Grade 1) Importance for Nature Conservation	11
Site of Borough (Grade 1) Importance for Nature Conservation	25
Sites of Local Importance for Nature Conservation	22
Local Nature Reserves	15

Source: Merton Local Plan (2014)

## Open space and recreation

8.16 Merton has 1,329 hectares of open space, which accounts for 35% of the borough. Of this, 21% is public open space. In comparison, London has 42% open space, and 18% public open space<sup>17</sup>. Merton's Open Space land cover is similar to neighbouring outer boroughs Kingston (37%) and Sutton (34%). The largest open spaces in Merton are Wimbledon Common and Mitcham Common, with other large clusters of open space in Morden Park, Cannon Hill and the Wandle Valley.

Applying GLA population projections<sup>18</sup>, open space provision in 2018 is 6.3 hectares per 1,000 population, but with anticipated population growth (up to 2035), this will reduce to 5.6 hectares per 1,000 population. Using high and low population projections from Merton's Strategic Housing Market Assessment (SHMA)<sup>19</sup>, future provision ranges from 5.3 to 5.9 hectares per 1,000 population.

## Public Rights of way to access greenspaces

- 8.17 All the Public Rights of Way (PROW) in the borough come under the responsibility of Merton Council. There are approximately 32kms of public rights of way, which the council maintains. 12 Local authorities are required to assess the extent to which rights of way meet current and likely future needs of the public. Consideration must also be given to the opportunities provided by local rights of way, such as footpaths, cycle tracks, bridleways and restricted byways, for exercise and enjoyment of the area. A key responsibility is the assessment of the level of accessibility of local rights of way to those with restricted mobility with particular mention for those who are blind or partially sighted.
- 8.18 Merton as the Local Highway Authorities has a duty under the Wildlife and Countryside Act 1981 and the Highways Act 1980 to maintain and keep the definitive map and statement of public rights of way and to ensure that ways are adequately signposted, maintained and free from obstruction. Types of rights of way include:
- Footpath: When a path is used for walking only, it is a footpath. (This is different from the pavement alongside a road)
  - Bridleway: Bridleways are also footpaths, but additionally users are permitted to ride or lead a horse and ride bicycles. Horse drawn vehicles are not allowed. Cyclists must give way to pedestrians and horse riders. Motorcycling is not allowed.

## Conservation Areas and Historic Parks and Gardens

- 8.19 Merton has a 28 Conservation Area across the borough totalling 656.45 ha. Merton has 3 Historic Parks and Gardens; these are mainly in the west of the borough in the Wimbledon area.

Figure 40: Merton's Historic Parks and Gardens

Name of Historic Park and Gardens	Grade
Cannizaro Park	Grade II*
Wimbledon Park	Grade II*
Morden Hall Park	Grade II
South Park Gardens	Grade II

## Listed Buildings, Scheduled Ancient Monuments and Historic Sites

- 8.20 Merton has a rich heritage of buildings, which are of historical or architectural interest. A number of these buildings have been recognised as having a special architectural or historic interest and have been included on the statutory list that is compiled and managed by Historic England.<sup>4</sup> Currently Merton has around 250 statutory listed buildings.
- 8.21 Scheduled monuments are not always ancient, or visible above ground. There are over 200 categories of monuments on the Schedule and they, range from prehistoric standing stones and burial mounds, through to the many types of medieval site (for example Merton Priory – an Augustinian priory). In Merton there are 3 Scheduled Ancient Monuments they are:
- Caesar's Camp, Wimbledon Common
  - Merton Priory, South Wimbledon/Colliers Wood
  - Morden Park Mound, Morden

### Historic Sites

- Southside House, Grade II\* visitor attraction
  - National Trust, Morden Hall / Watermeads
  - Merton Abbey Mills
- 8.22 In Merton there are 4 registered museums in the borough:
- All England Lawn Tennis Museum
  - Wandle Industrial Museum
  - Wimbledon Society Museum of Local History
  - Wimbledon Windmill

## Archaeological heritage

- 8.23 Merton's historic environment bears more than 10,000 years of human activity, ancient sites, monuments and landscapes, historic settlements, ancient features and finds. Remains of early settlements have also been found along the course of the River Wandle and Roman coins and pottery have been found in the vicinity of the Roman Road and Roman burials have also been discovered in

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<sup>4</sup> <https://historicengland.org.uk/>

Mitcham. Merton has 20 areas designated as Archaeology Priority Zones (APZs) arranged under a number of archaeological themes.

Figure 41: Archaeological Priority Zones

Type of Archaeological Theme	Name of Archaeological Priority Zone (APZ)	Description of site APZ
Alluvial	Wandle Valley Alluvium	This area includes the alluvial silts deposited within the Wandle Valley. Evidence for both prehistoric human activities, and the contemporary natural environment can be preserved within or beneath the alluvial deposits.
	Beverley Brook Valley Alluvium	This area maps the extent of alluvial deposits along the course of the Beverley Brook. Although this area is thought to have played a less significant role than the Wandle Valley in the history of the area, it has potential for the survival of evidence of past environments as well as prehistoric (and later) human activities.
Prehistoric Landscapes	Wimbledon Common	The status of Wimbledon Common itself means that there has been relatively little archaeological work in this area, but stray/casual finds have demonstrated that evidence covering the whole prehistoric period may be anticipated to survive as buried remains. The Priority Zone Designation extends beyond the modern limits of the Common to include additional areas where archaeological evidence for prehistoric landscapes has been shown to survive.
	Mitcham Common	This area takes in a swathe of gravel terrace on the eastern side of the Wandle Valley. Finds of Mesolithic and Neolithic flint tools, Bronze Age metalwork, and stray Iron Age coins have been recovered from this area, demonstrating the area's significance for early settlement and indicating its potential for the survival of further remains.
	Morden Park	This area encompasses the northern part of the modern Morden Park, where remains of Roman and medieval date have been found. The Park contains a Scheduled Monument 'Morden Park Mound', thought possibly to be (or to incorporate) a Roman burial mound, or to be an eighteenth century prospect mound created within Morden Park.
	Merton Village (South Wimbledon area towards Wimbledon Chase)	The medieval estate of Merton originated in the later Saxon period and is first referred to by name in a document of 949 AD. By the time of the Domesday Survey of 1086 the estate included a church and two mills, set within extensive agricultural land.
	Wimbledon	The historic village core occupies higher ground on the watershed between the valleys

Settlements		of the Wandle and the Beverley Brook. Wimbledon is not mentioned in the Domesday Survey, and it may have formed an outlying grange of the extensive Mortlake estate at that time. Wimbledon is recorded as a separate unit from the early fourteenth century onwards.
	Mitcham	The earliest historical reference to Mitcham settlement comes from an eighth century document, although archaeological evidence also points to unconnected Roman and early Saxon activity in the area. The medieval village developed as a 'ribbon' settlement along the London-Sutton Road, with two foci: Upper Green (probably also known as Michelham) and Lower Green (also known as Wickford Green).
	Morden	The estate of Morden is first referred to in the tenth century and appears to have remained polyfocal with a particular cluster in the vicinity of the church throughout the medieval and post-medieval periods (this may be partly explained by its location on London Clay based soils rather than more easily cultivated gravels or river alluvium deposits). There was a second settlement at Lower Morden, near the Beverley Brook – this is identified as a separate Priority Zone (Map Area 11).
	Cannon Hill	An indication of human activity in this area on John Rocque's maps of 1749-62 suggests that this area may contain important remains.
	Lower Morden	Medieval finds have been recovered from this area, indicating early human activity.
	West Barnes	This zone covers the location of West Barnes Farm, a Medieval, probably moated, 'Grange' belonging to Merton Priory
Settlement - Communications Routes	'Stane Street'	The line of an important Roman road, crossing the Borough between Colliers Wood and Pylford Bridge. The route of the road is preserved in part by modern streets (High Street Colliers Wood, and parts of London Road, Morden – both parts of the A24), although it appears to have taken a more direct route across Wandle Valley than the present A24 (which runs to the north through Merton).
	Wandle/Copper Mill Lane	A centre of water-powered and water utilising industry from at least the medieval period onwards, this area included medieval corn mills and an eighteenth century copper mill. The latter was found at the end of Copper Mill Lane and was replaced, in the nineteenth century by a mill for the processing of leather
	Wandle/Colliers Wood	This area has formed a particular focus for riverside industry from at least the medieval period onwards, with several corn mills being found along this stretch of the river during the medieval period. These were supplanted in the post-medieval period by textile

Riverside Industries		processing and finishing industries, initially calico bleaching and printing and subsequently the textile printing works of Arthur Liberty and of William Morris
	Wandle/Mitcham	The Wandle Riverside around Mitcham was famed in the eighteenth and nineteenth centuries for the market gardening of aromatic and medicinal herbs, watercress and other crops. It was also important in the seventeenth and eighteenth centuries for calico bleaching and printing, copper, flour, and snuff milling, leather working and the manufacture of paper, flock and felt.
	Mill Corner	Documentary sources indicate the presence of a water mill on this part of the Beverley Brook in the fifteenth century, and a series of fishponds. The mill appears to have been demolished sometime before the eighteenth century.
Post Medieval Estates and Gardens	Merton Place	Built around 1700, between the village of Merton and the River Wandle, possibly on the site of an earlier, medieval, moated structure. The house is noted as being the only house owned by Admiral Nelson who converted the moat into a garden feature and called it 'The Nile'.
	Wimbledon Park House	The house was originally built in 1588 but was much altered in the 1640s by Inigo Jones. The site of the early House is not known with certainty, but it is thought to lie close to the village church.
	Morden Hall and Park	The existing Morden Hall dates from the mid-eighteenth century, replacing an earlier, Tudor Manor House to the south. The Hall is moated and the moat is an eighteenth decorative feature contemporary with the house.

## Blue infrastructure

### *Rivers*

- 8.24 The River Graveney flows in an approximately east to west direction along the northern boundary of Merton. The area to the northeast of Mitcham Eastfields railway station to be defined as Flood Zone 2 associated with the River Graveney, extending towards Oakleigh Way Recreation Ground and the northern part of Figge's Marsh. Beverley Brook is a minor English river 14.3 km (8.9 mi) long in southwest London. The Beverley Brook flows in an approximately south north direction along the western boundary

of Merton and eventually discharges into the River Thames at Barnes. It rises in Worcester Park and joins the River Thames to the north of Putney Embankment at Barn Elms.

- 8.25 The Pyl Brook is a tributary of the Beverley Brook. The Pyl Brook rises to the south of Sutton Common train station before flowing in an approximately south-east to northwest direction through Merton and connecting to the Beverley Brook in Beverley Park on the western boundary of Merton. An approximately 600m section of the Pyl Brook running adjacent to West Barnes Lane is culverted between Kingsway and Raynes Park High School. The Derwent Road Flood Storage Area provides additional storage from the Pyl Brook during periods of high flow. Areas surrounding Raynes Park High School, Memorial Ground, Westway and West Barnes Lane are defined as Flood Zone 3 associated with the Pyl Brook. Areas surrounding Cannon Hill Lane and Lower Morden Road are defined as Flood Zone 2. Appendix 1 Maps: identifies the rivers and flood zones in Merton.

#### *Ordinary watercourse<sup>5</sup> and reservoirs*

- 8.26 In total there is approximately 69km of ordinary watercourse in Merton, approximately 5km of which is culverted<sup>6</sup>. The majority of watercourses are in Wimbledon Common, Mitcham Common, Raynes Park area, Cannon Hill Common and Wimbledon Park. Merton has 1 reservoir, Wimbledon Park Lake as defined under the Reservoir Act 1975 which is raised.
- 8.27 The lake in Wimbledon Park dates to 1765 when it was created for the first Earl Spencer as the central feature of a landscaped park in front of the family's mansion house located on the high ground up what is now Church Road towards Wimbledon Village. Responsibility for design was given to Lancelot 'Capability' Brown, was, then and still now, acknowledged as one of England's foremost landscape architects. 'Capability' Brown spent some 20 years transforming the formal Renaissance Gardens into a more natural landscape, including building a dam across the valley to convert a marshy stream and surrounding bog into an impressive 30-acre lake. The lake passed into public ownership in the early 20th Century when it was purchased by the forerunner of Merton Council. Since then, the lake has been used primarily as a reservoir and for leisure purposes including swimming, water sports and angling. The council has a Statutory and legal obligation to maintain the reservoir under Section 10 of the Reservoirs Act, 1975.

#### *River biodiversity*

- 8.28 The River Wandle is naturally a chalk stream and described as a rare and unique type of river. However, the long-standing urban

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<sup>5</sup> A **watercourse** that is not part of a main river... all rivers and streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.'

<sup>6</sup> A culvert is a structure that allows water to flow under a road, railroad, trail, or similar obstruction from one side to the other side. Typically embedded so as to be surrounded by soil, a culvert may be made from a pipe, reinforced concrete or other material.

nature of the river has resulted in certain stretches being healthier than other parts of the river, with weirs commonly preventing fish from moving freely along the river.

8.29 The Environment Agency and partners are studying the options for improving fish movement up and down the River Wandle. An increase in fish passage will be required to enable the River Wandle to meet objectives set by the Water Framework Directive. In 2013 the Environment Agency fisheries survey on the River Wandle through Merton revealed a diverse fish population including:

- chub
- roach
- eel
- gudgeon
- dace
- perch
- dace
- carp bullhead
- stone loach

8.30 A fish survey of Wimbledon Common showed excellent fish populations to be present including chub, dace, eel, gudgeon, roach and 3 spined stickleback

### **Water supply and wastewater treatment**

#### *Water supply*

8.31 London's Victorian sewerage and water supply network is struggling to cope with current demands. Thames Water forecasts that, without significant new investment, demand for water will exceed supply by 10% in London by 2025, rising to 21% by 2040. This equates to a deficit of over half a billion litres of water a day by 2050. London's combined sewer system, built over 150 years ago was designed for a smaller, more permeable city. The challenges of London's growing population, changing land uses and changing climate mean that London is outgrowing its drains and sewers. This in turn is a contributing factor towards the increasing the risk of flooding.

8.32 The majority of Merton falls within Thames Water Utilities Ltd (known as Thames Water) resource zone apart from some areas near

the borough boundary with Sutton. Merton's average water consumption is 160 litres per day (160/l/d) (2012), which is slightly above the London average (164/l/d), with around 25% of households with water-meters installed within their homes, an increase of 15% from 2001/01. Merton's population, as with the rest of the London population, mainly rely on water supplies that have originated from outside London. 55% of the available water lies within the Thames Basin, 80% used for public water supply purpose.

### *Sewage treatment works*

- 8.33 Merton is served by "Crossness" sewage treatment works; in 2009 it served a population of 1, 1890,000. Crossness is permitted to discharge 1,485,00m<sup>3</sup>/d of treated sewage effluent into the Thames Tideway. There are planned upgrades which will provide sufficient treatment at Crossness to ensure that it can cope with London's growing population to at least 2021 whilst improved quality effluent to meet water quality requirements. The improvements will enable the site to treat 44% more sewage than at present. This increase in treatment capacity will allow for a 6% increase in population until 2021.

### **Energy use and supply**

- 8.34 Reducing overall energy consumption and being more energy efficient is vital to reducing greenhouse gas emissions and contributing to a secure energy future. Reducing energy consumption through more efficient buildings and appliances can also help to tackle issues of energy affordability and fuel poverty.
- 8.35 Fuel poverty continues to be an issue in London, with 9.8% or 326,114 households meeting the Government's 'low-income high cost' definition of fuel poverty (compared to 10.4% across England). However, as the definition favours larger homes, there may be many households in smaller properties who also struggle to pay their fuel bills despite not meeting the definition. Fuel poverty tends to be more prevalent in inner London boroughs and lessens in outer London. However, in Merton it is estimated that 10.2% of household (8,151) are fuel poor, which is similar to London and England (2015). Between 2012 and 2014 levels of fuel poverty in Merton increased, although 2015 shows a slight fall. A similar trend is clear across London.
- 8.36 The demand for energy changes by season. In the winter months, consumption of gas is higher due to use of central heating for buildings. However, in the summer months, there is a general shift towards higher electricity use from air conditioning to cool buildings. Consumption can also vary from year to year depending on the weather.
- 8.37 Gas usage has decreased since 1990, and this trend is expected to continue despite projected population growth, however it is very much dependent upon national energy policies. Electricity usage has stabilised despite the increase in population, largely due to increased efficiency of appliances. However, it is expected that demand for electricity to rise as population continues to grow and

heating and transportation are increasingly electrified, in favour of electricity from a decarbonised grid.

### **Noise and Vibration**

- 8.38 There is no single definition of noise. Noise can be defined as unwanted sound. Often referred ironically, as the silent polluter, in that its effects can be hard to establish. This is because the problem is psychological: differences in perception such as the type or loudness of music for example. Noise disturbance can be associated with health problems such as sleep disturbance, stress, anxiety, high blood pressure, poor mental health in adults and school performance and cognitive impairment in children. Noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities. Continuous effects of noise pollution can also result in higher rates of cardiovascular disease and deteriorating mental health. Some of the main sources of noise across Merton are likely to include impacts from increasing levels of traffic on roads.
- 8.39 Three types of noise are defined in the Noise Policy Statement for England (NPSE) (March 2010); these are:
- environmental noise: which includes noise from transportation sources
  - neighbour noise: which includes noise from inside and outside people's homes
  - neighbourhood noise: which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street

### **Air Quality**

- 8.40 Pollution in Merton comes from a variety of sources. This includes pollution from sources outside of the borough and in the case of particulate matter; a sizeable proportion of this comes from outside London and beyond the UK (United Kingdom). Of the pollution that originates in the borough the main sources of NO<sub>2</sub> are transport (57.1%), domestic gas boilers (18.8%) and static non-road mobile machinery (11.6%).
- 8.41 The main sources of particulate matter are road transport (50.4%), re-suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). In respect of the transport sources apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NO<sub>x</sub> emissions and 80% of the PM<sub>10</sub> emissions (based on 2013 modelled data). This supports the evidence from the dispersion modelling (Appendix B) which shows that the highest concentrations of both NO<sub>2</sub> and PM<sub>10</sub> are most strongly associated with the main traffic routes and road junctions within the borough.

8.42 The Greater London Authority (GLA) identified Air Quality Focus Areas in 2014. These are locations that not only exceed the EU annual mean limit value for NO<sub>2</sub> but are also locations with high human exposure. The Focus Areas were defined to address concerns raised by boroughs within the Local Air Quality Management process and forecasted air pollution trends. This is not an exhaustive list of London's hotspot locations, but where the GLA believe the problem to be most acute.

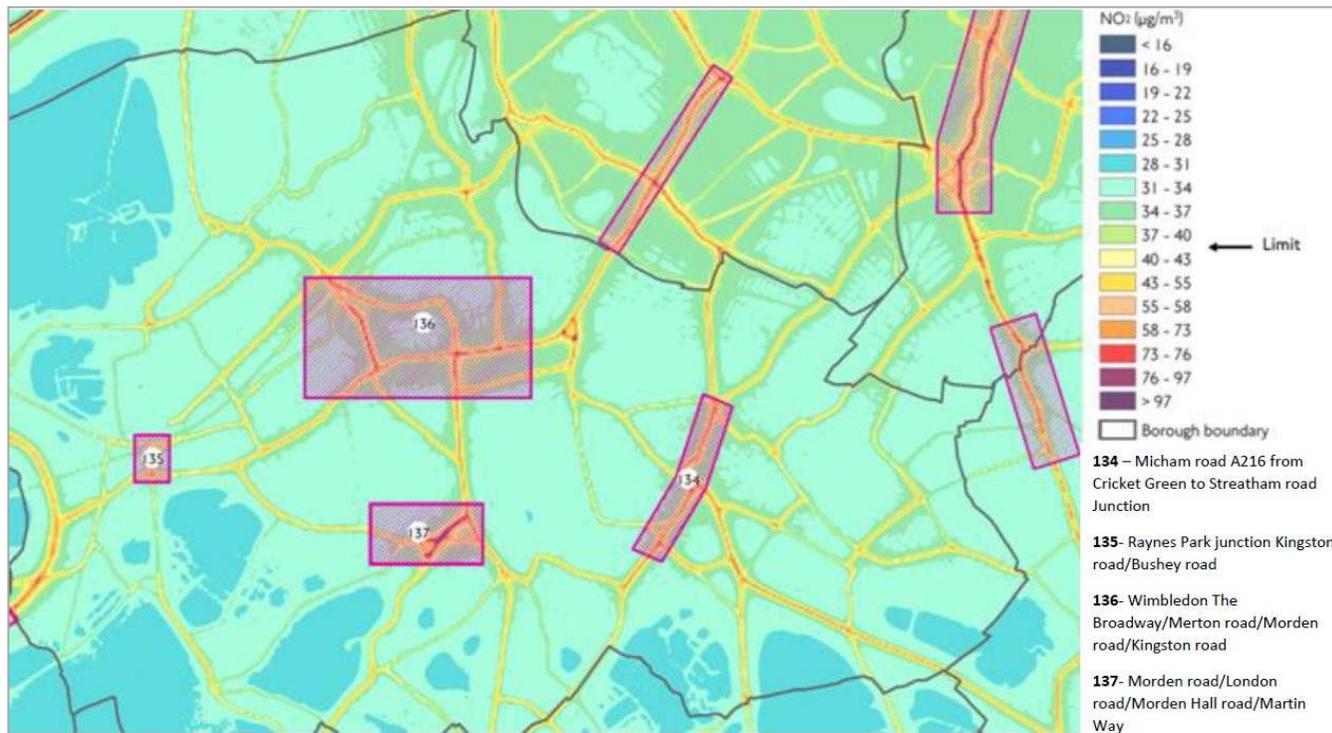


Figure 42: CO2 emissions by source type

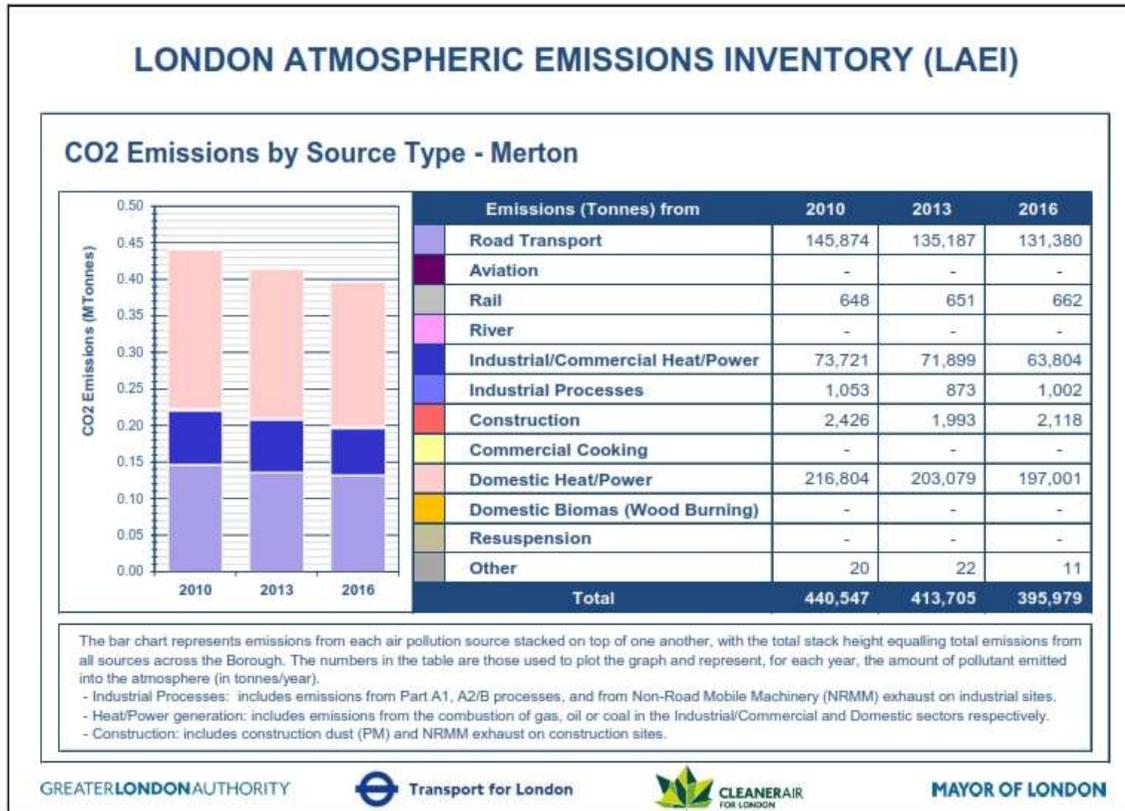


Figure 42: NOx (nitrogen oxides) emissions by source

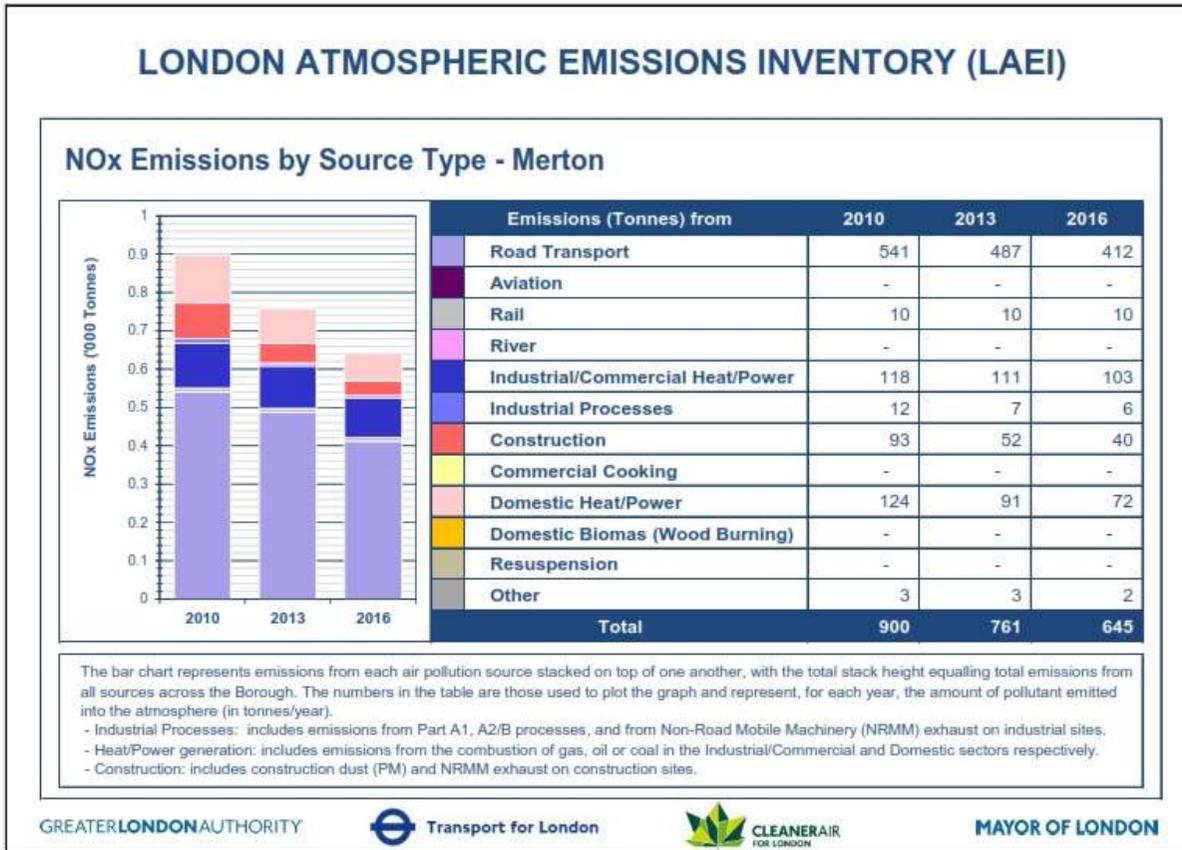
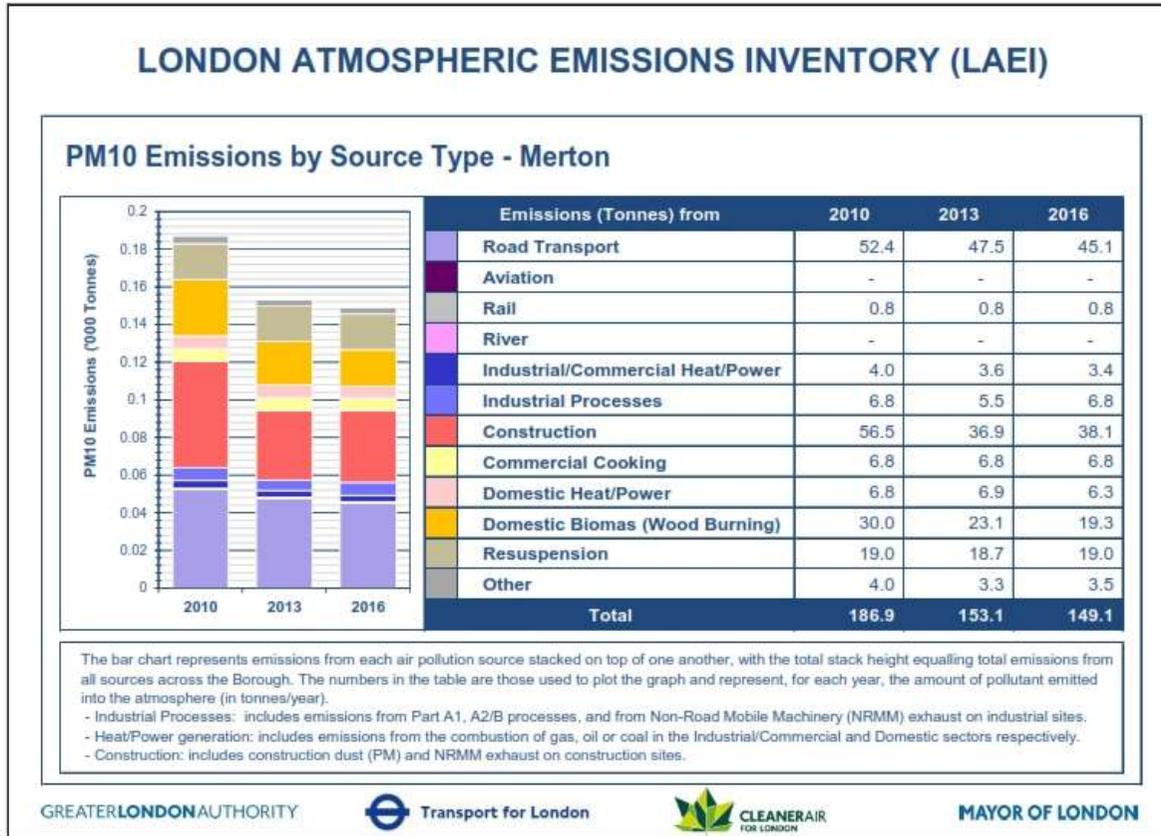


Figure 43: PM10 emissions by source

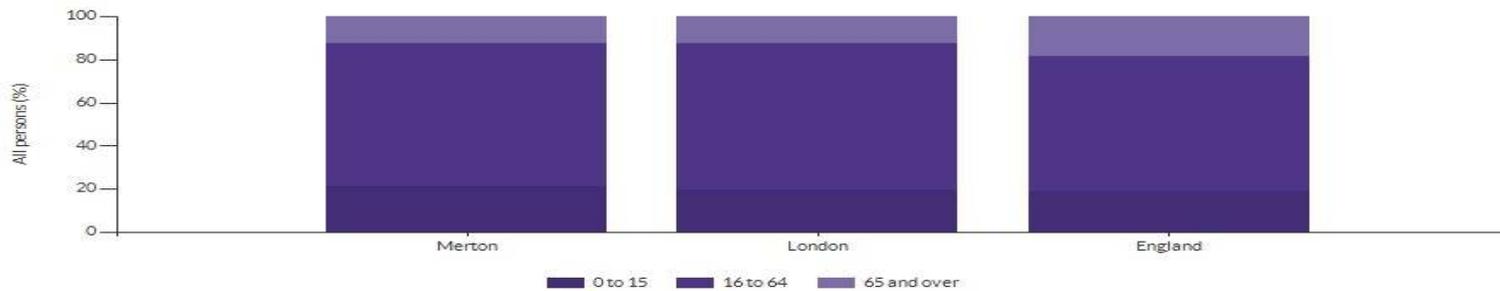


## Social baseline data

### Populations

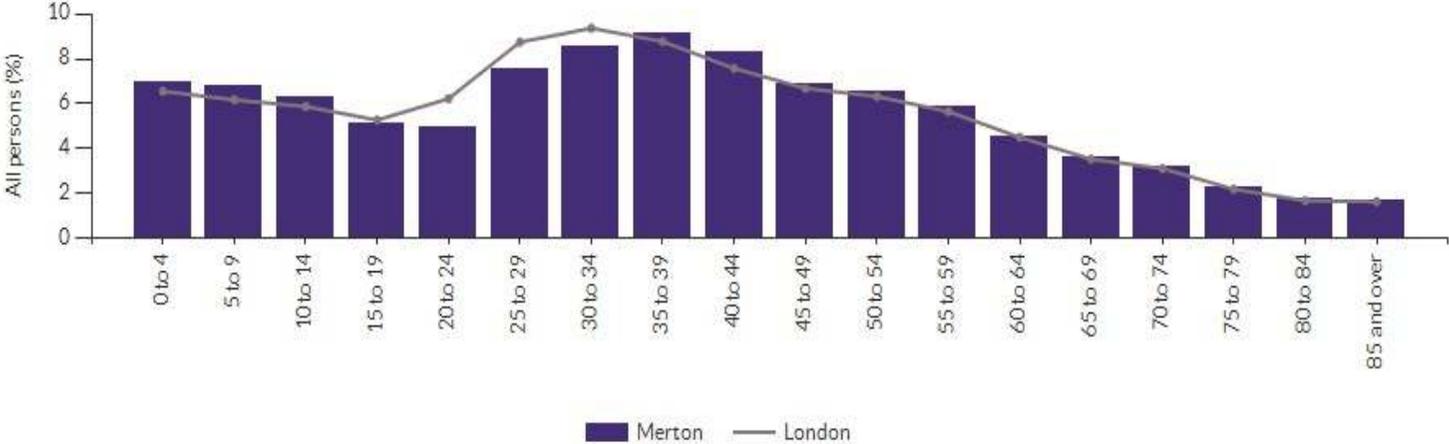
8.43 Merton's population is projected to increase to 222,717 by 2025 and 232,473 by 2030. The age profile is also predicted to shift with a notable growth in the proportion of the population that are under the age of 16 and those over 50 years old. The number of households is projected to rise to 99,000 by 2021, an average annual household growth of 2.2%, with much of the increase expected to be in single person households.

Figure 44: Population projections (Housing-Led)



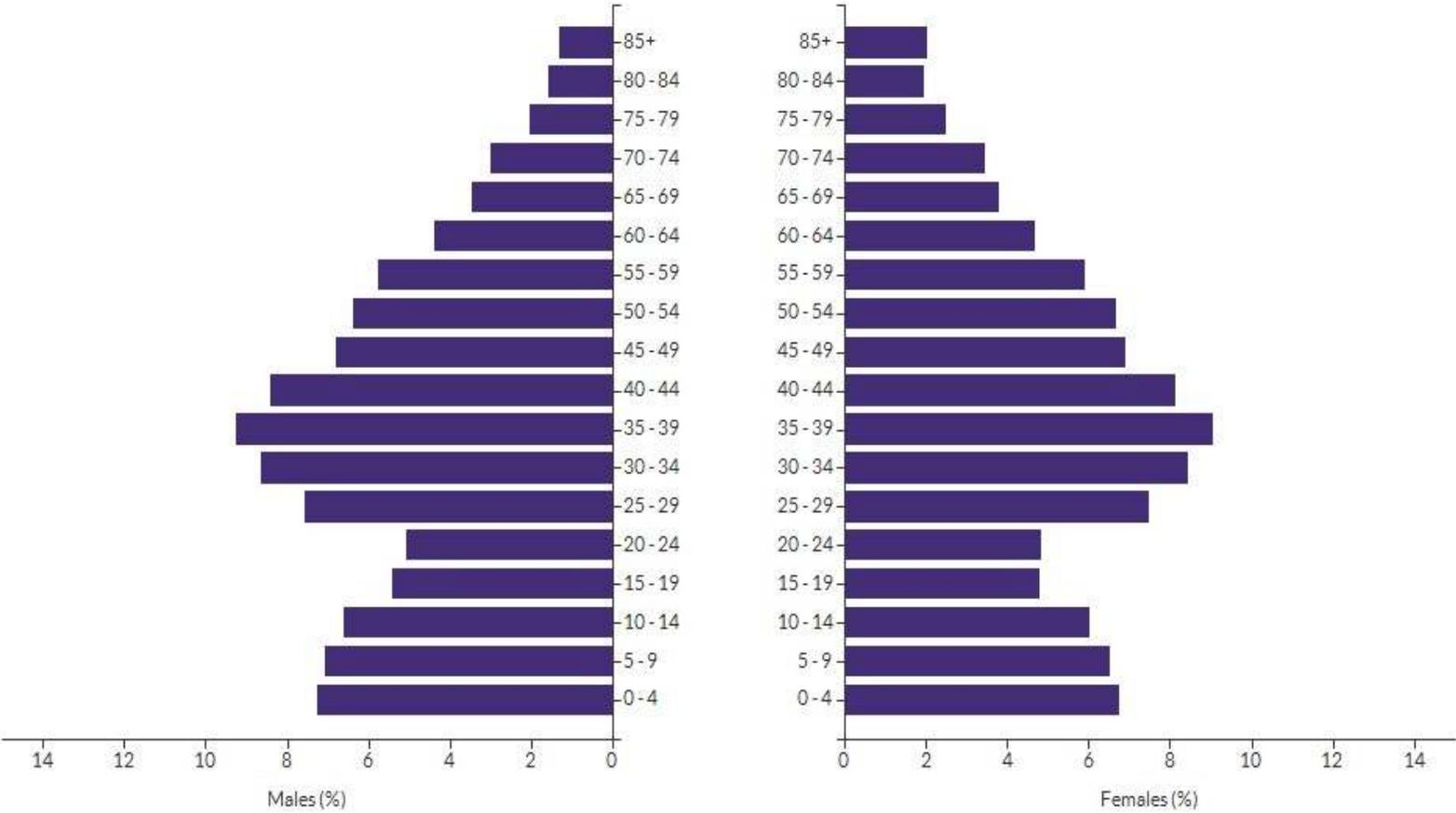
Date: 2020 Source: GLA

Figure 45: Population projection for all persons by 5-year age group



Date: 2020 Source: GLA

Figure 46: Population projection for males and females

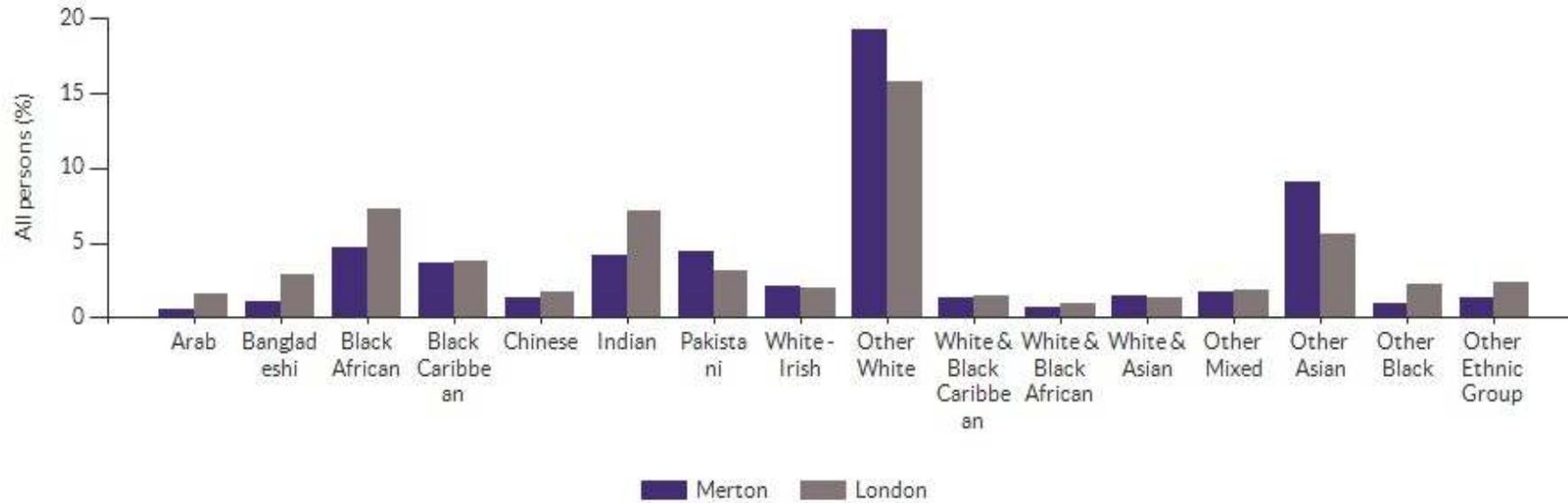


Date: 2020 Source: GLA

Date: 2020 Source: GLA

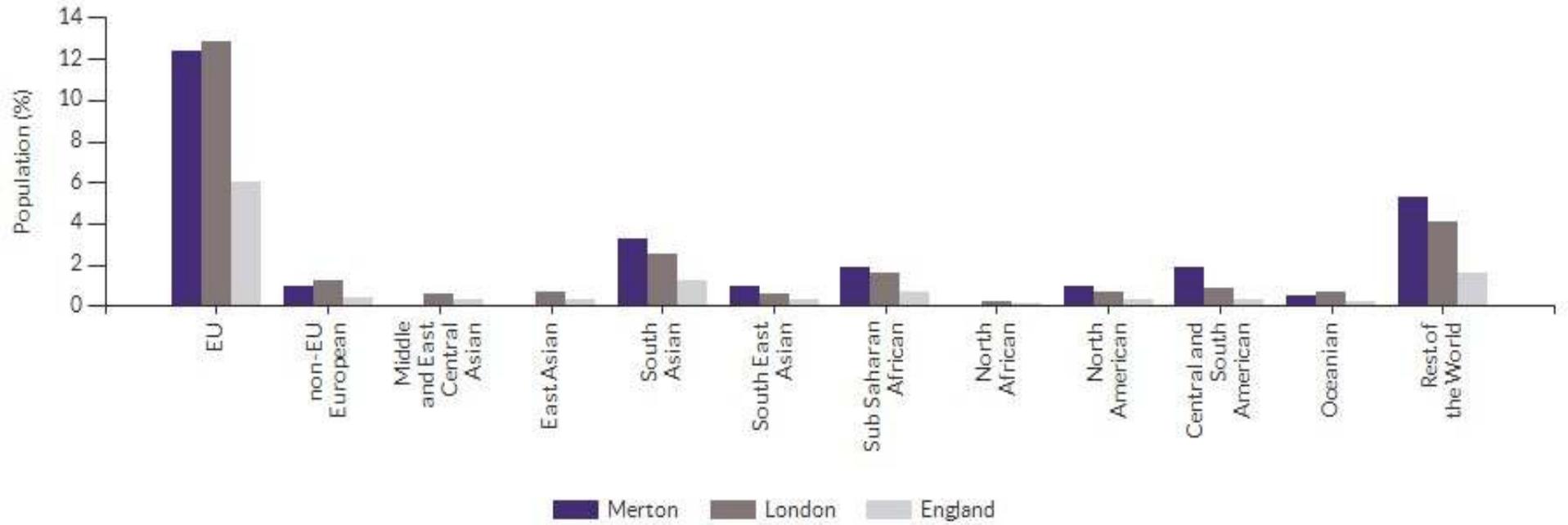
8.44 Merton has a diverse mix of ethnic groups, culture, and languages. GLA data in 2020 puts Merton's Black, Asian and Minority Ethnic (BAME) population as 78,390, meaning BAME groups make up just under 37% of the population.

Figure 47: Projected ethnic make -up



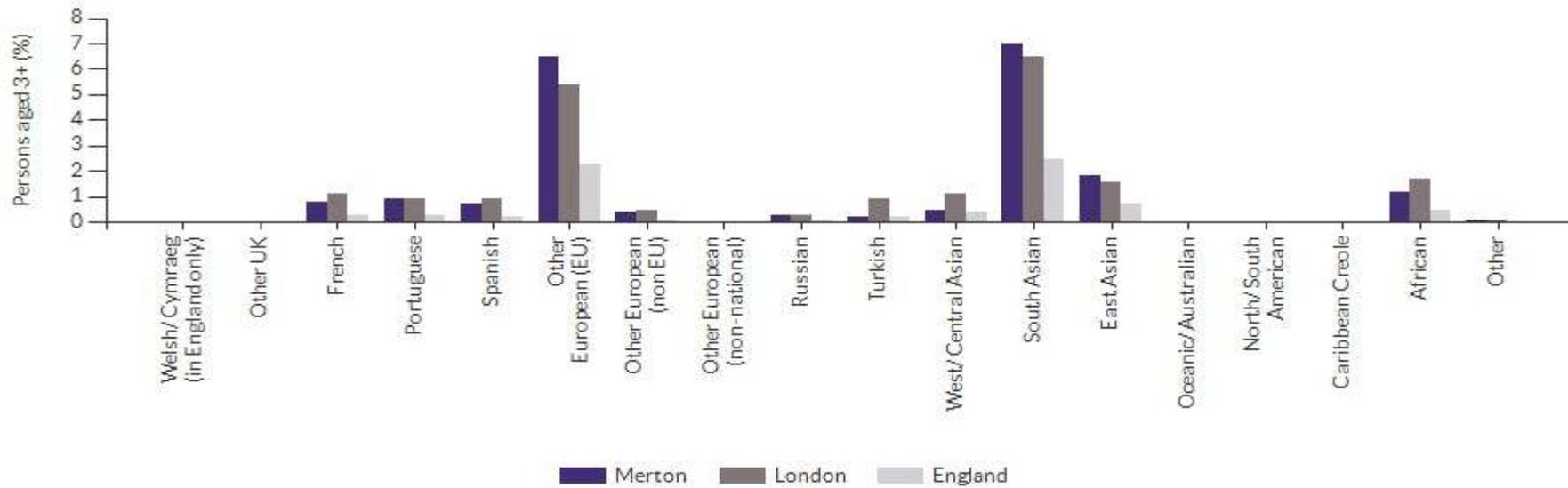
Date: 2020 Source: GLA

Figure 48: Population by nationality (excluding UK)



Date: 2019 Source: ONS

Figure 49: Main languages spoken in Merton



Source: ONS Census 2011

## Housing

8.45 The London Plan identified the need for 66,000 additional homes per year across London. Merton’s ten-year London Plan housing target is 9,180 (918 per year). The 2019 Merton Strategic Housing Needs Assessment (SHNA) identified a need for more homes of all types and sizes throughout the borough. It is anticipated that new homes will be concentrated around existing town centres and areas with good access to public transport and local services, these include Mitcham, Morden, Colliers Wood, South Wimbledon, Wimbledon and Raynes Park sub areas<sup>7</sup>.

<sup>7</sup> <https://data.merton.gov.uk/housing/>

- 8.46 The affordability ratio in Merton is higher than both London and England, so lower-income residents and first-time buyers may struggle to get on the property ladder<sup>8</sup>. Expensive housing is likely to push low-income households in to overcrowded and unsuitable conditions. Average rental prices have increased 39% over the last 10 years<sup>9</sup>. Housing is more expensive in the west of the borough with Wimbledon Village having some of the highest house prices in the country. Prices are cheaper in the east but are still significantly higher than national averages.
- 8.47 The COVID-19 pandemic has affected the cost of housing in Merton with rises of 13% between June 2020 and June 2021. This is likely due to Merton's suburban nature as homeowners look for larger properties and more outside space in response to the lockdown.
- 8.48 In 2021, there were 9,125 households on the Councils Housing Register (households waiting to be housed by the local authority) including accepted homeless households and only 191 social housing homes that became available for letting. The greatest need on the housing register is two- and three-bedroom homes, while most of the available homes are one-bedroom properties. Additionally, there were 153 accepted homeless households. There was a reduction in the number of households on the register from 2019/20 following installation of new housing system. All households were written to and asked to update their Choice Based Lettings (CBL) details. Households that did not update their details or whose letters were returned were removed from the register. Over 4,500 households on the Register experienced overcrowding as their primary need. Rates of overcrowding are higher in the east of the borough than the west.
- 8.49 Most recent data show that 7.2% of Merton households are overcrowded. This is slightly lower than the London average but significantly higher than the national rate of 3%<sup>10</sup>. Rates of overcrowding are higher in the east of the borough than the west.

### **Homelessness in Merton**

- 8.50 Rates of households in temporary accommodation in Merton are lower than the London average with 1.9 households per 1000. There are currently 260 children in temporary household accommodation in Merton which is the lowest rate in London<sup>11</sup>. Although Merton's levels of homelessness and use of temporary accommodation is low, homelessness applications due to evictions are expected to rise following the ending of the evictions moratorium (31 May 2021). This will likely increase pressure on council services, at a time compounded by the government's 'everyone in' principle where Councils had to arrange temporary accommodation for all rough sleepers in their areas, to limit spread of Covid-19.

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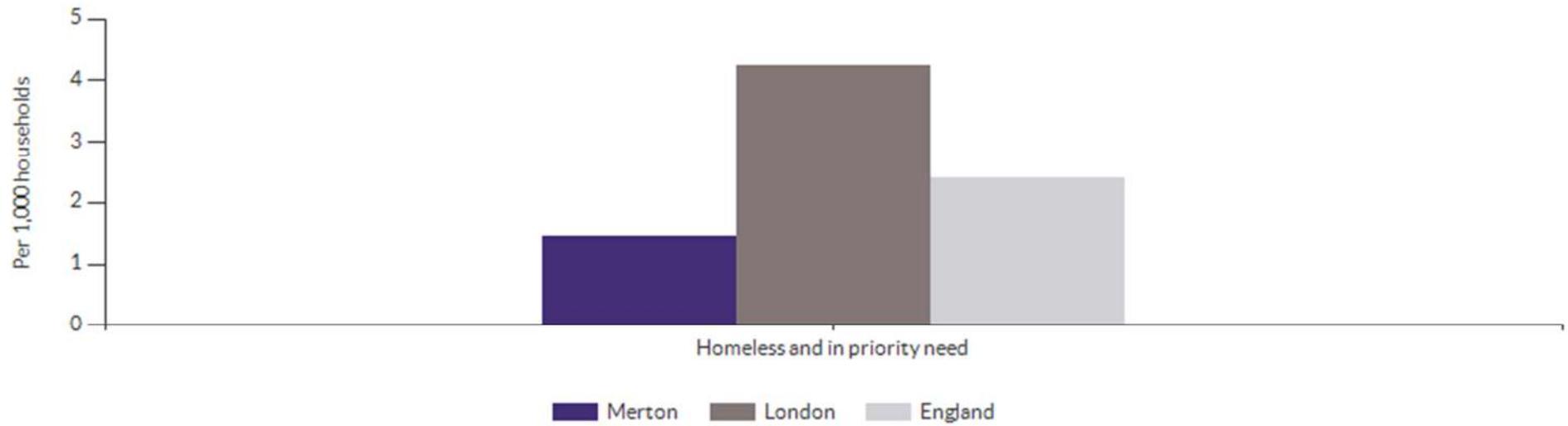
<sup>8</sup> <https://data.merton.gov.uk/housing/>

<sup>9</sup> <https://www.merton.gov.uk/assets/Documents/Draft%20Homelessness%20Strategy%20to%202025.pdf>

<sup>10</sup> <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest>

<sup>11</sup> [https://lginform.local.gov.uk/reports/lqastandard?mod-metric=12891&mod-area=E09000024&mod-group=AllBoroughInRegion\\_London&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lqastandard?mod-metric=12891&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup)

Figure 50: Homeless in Merton

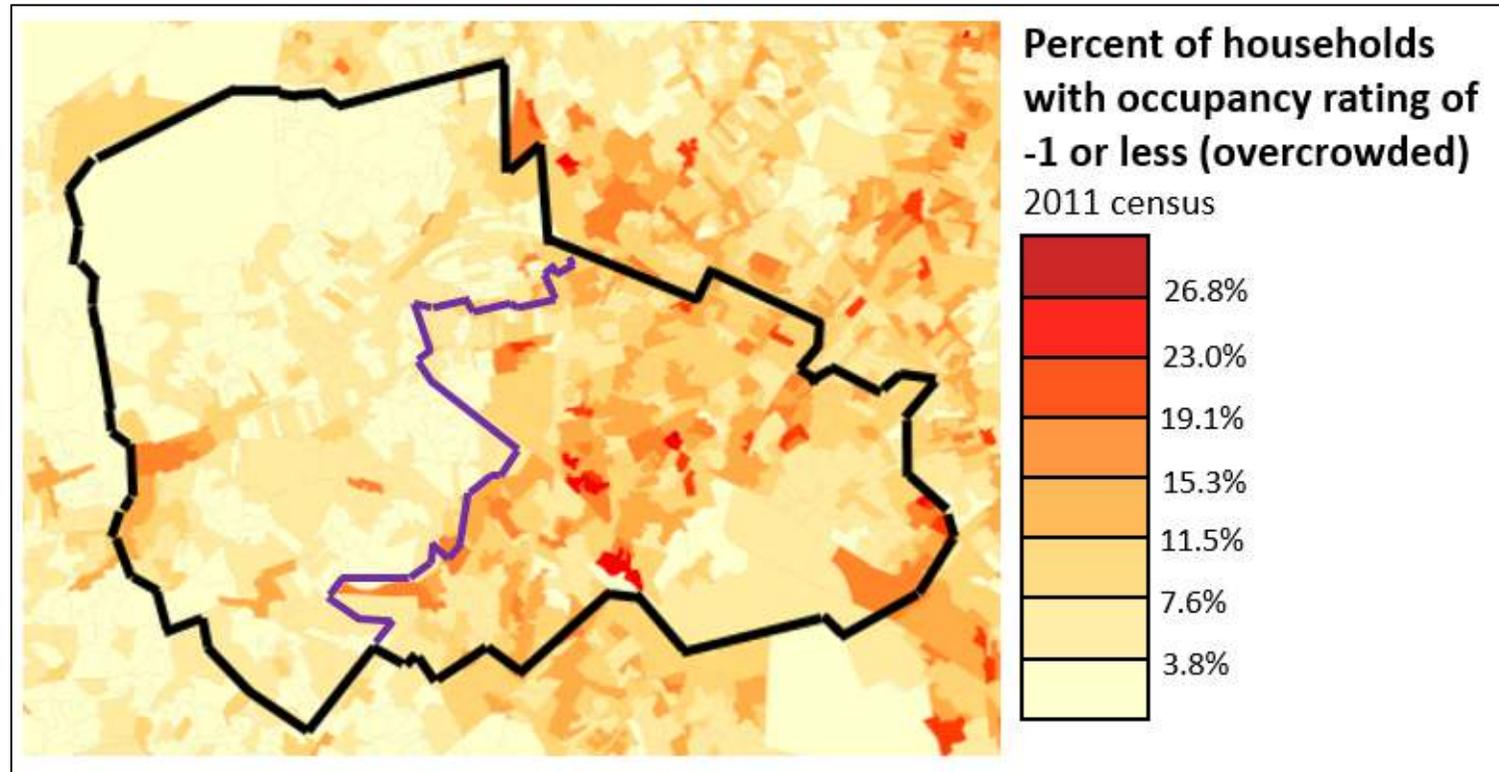


Date: 2017-2018 Source: MHCLG

### Overcrowding

8.51 More households in East Merton are HMOs (Houses of Multiple Occupation), with concentrations in Abbey, Colliers Wood and Graveney wards.

Figure 51: Overcrowding in Merton



8.52 Multigenerational households are those where an adult aged 65 years or older co-resides with at least another person who is more than 20 years younger, or with a child<sup>12</sup>. Multigenerational households have been associated with higher COVID transmission, especially due to the risk to older relatives<sup>13</sup>. Although data is not currently available at the Merton level, it is likely there are more multigenerational households in east of the borough, neighbourhood of Mitcham, Morden and Colliers Wood.

<sup>12</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/943178/S0923\\_housing\\_household\\_transmission\\_and\\_ethnicity.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943178/S0923_housing_household_transmission_and_ethnicity.pdf)

<sup>13</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2019#multi-family-households-are-the-fastest-growing-household-type-in-the-uk-but-currently-represent-the-smallest-share-of-households>

Figure 52: Other Households (Multiple person non-student households and student households) in Merton 2011

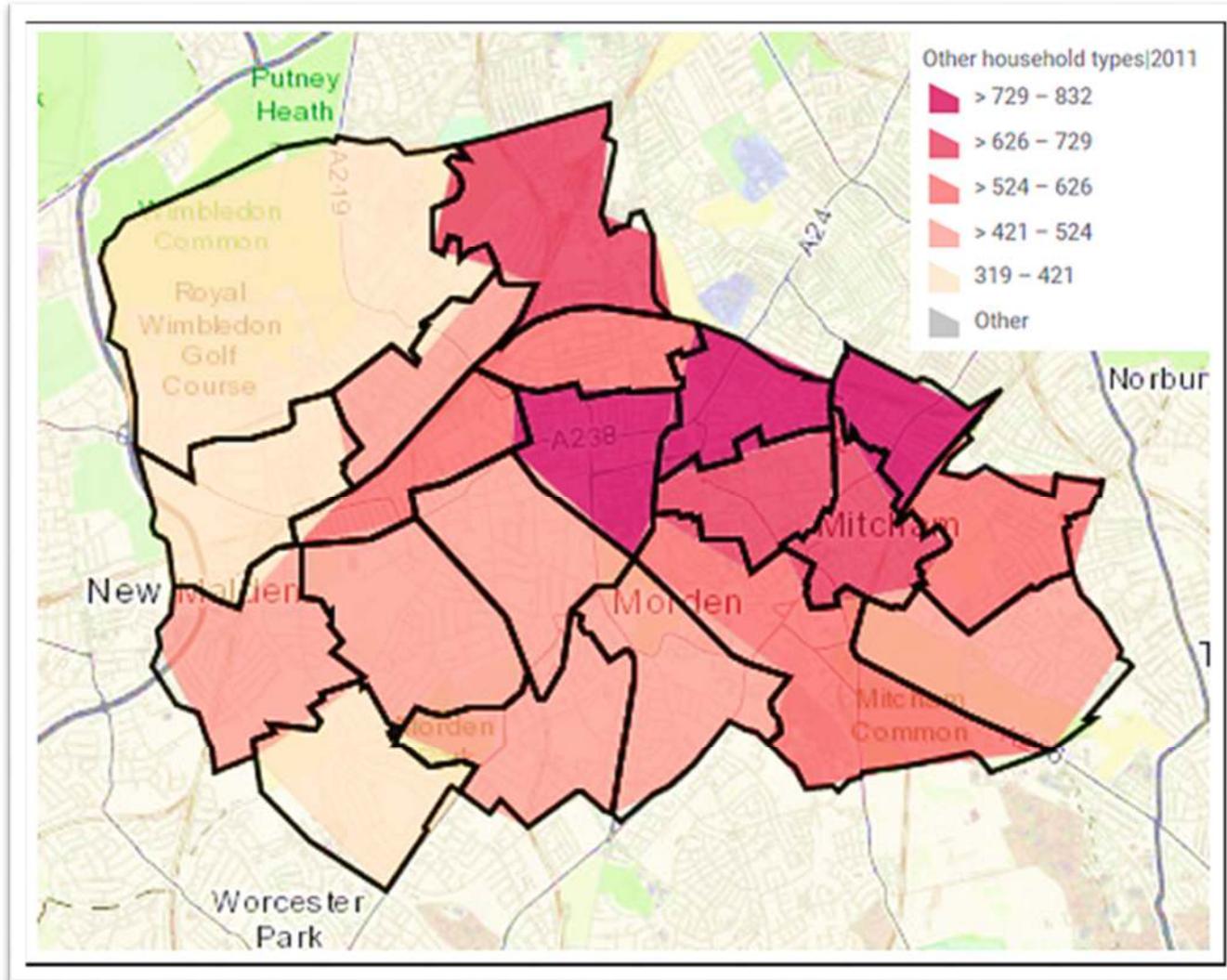
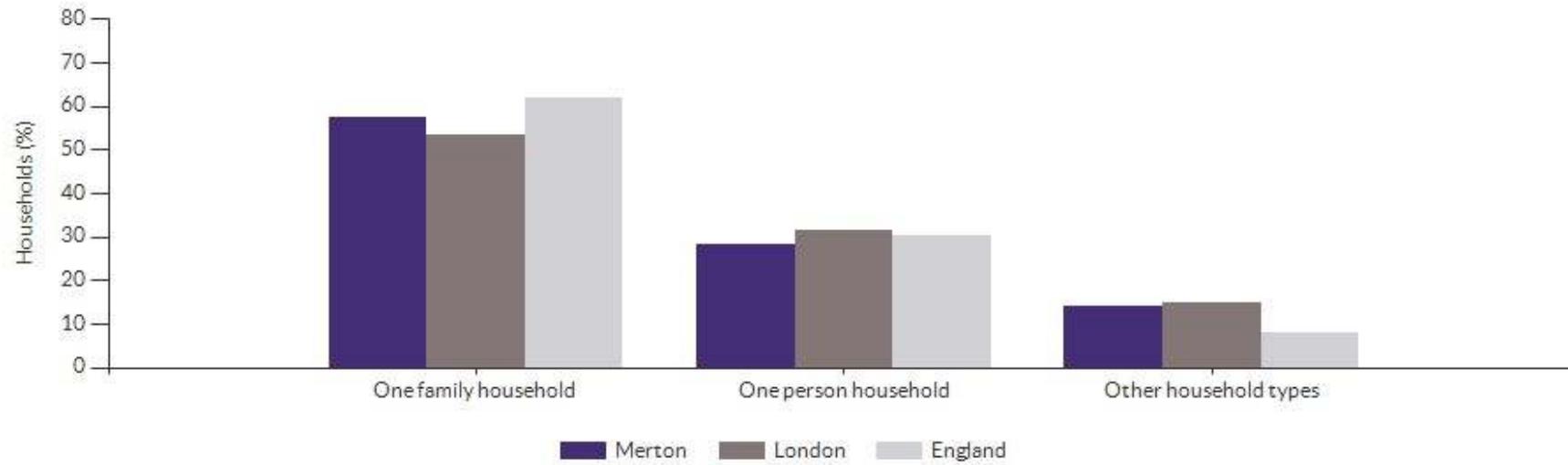
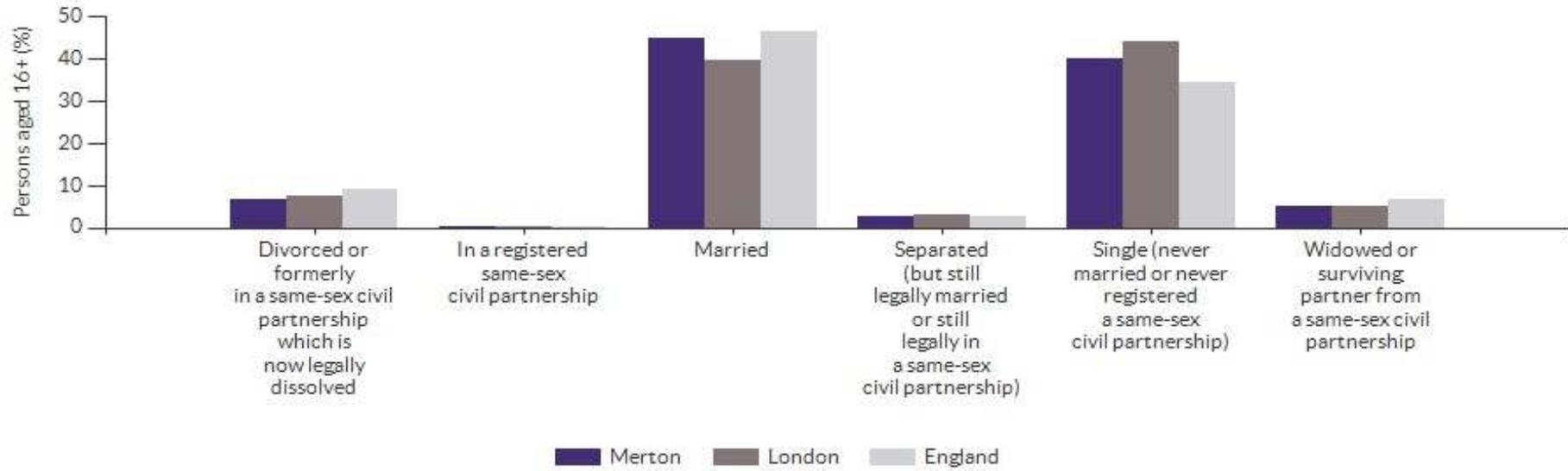


Figure 53: Household composition breakdown



Source: ONS Census 2011

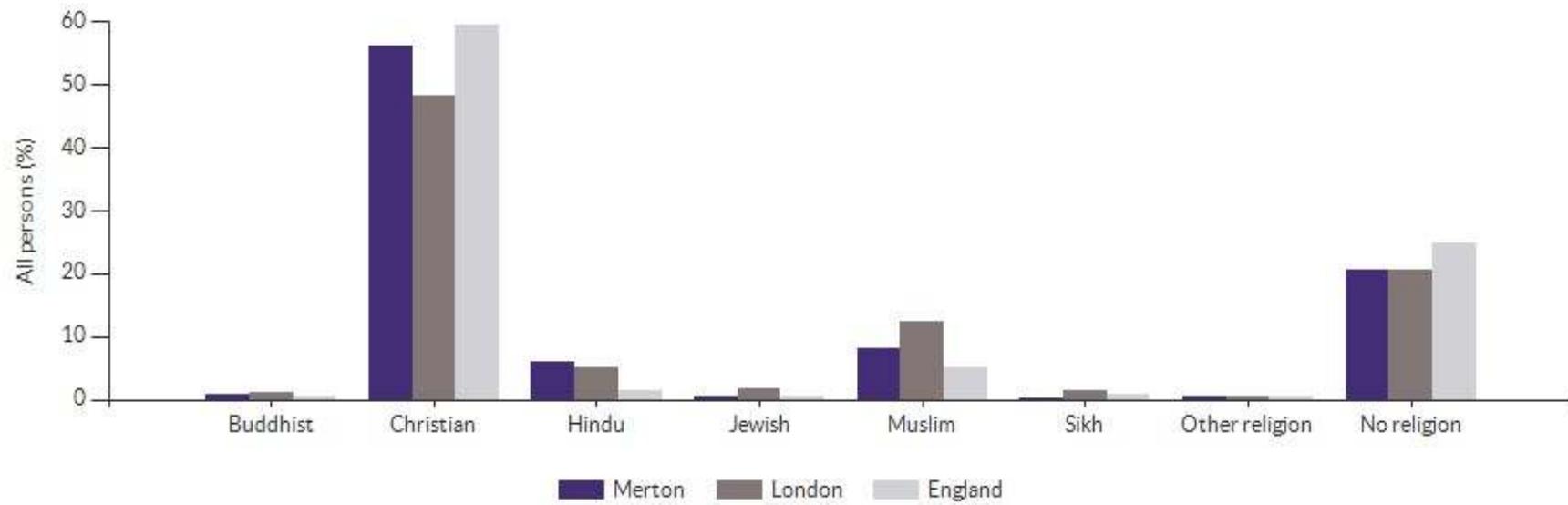
Figure 54: Marital and civil partnership status breakdown



Source: ONS Census 2011

Figure 55: Religion and beliefs in Merton

Religion breakdown

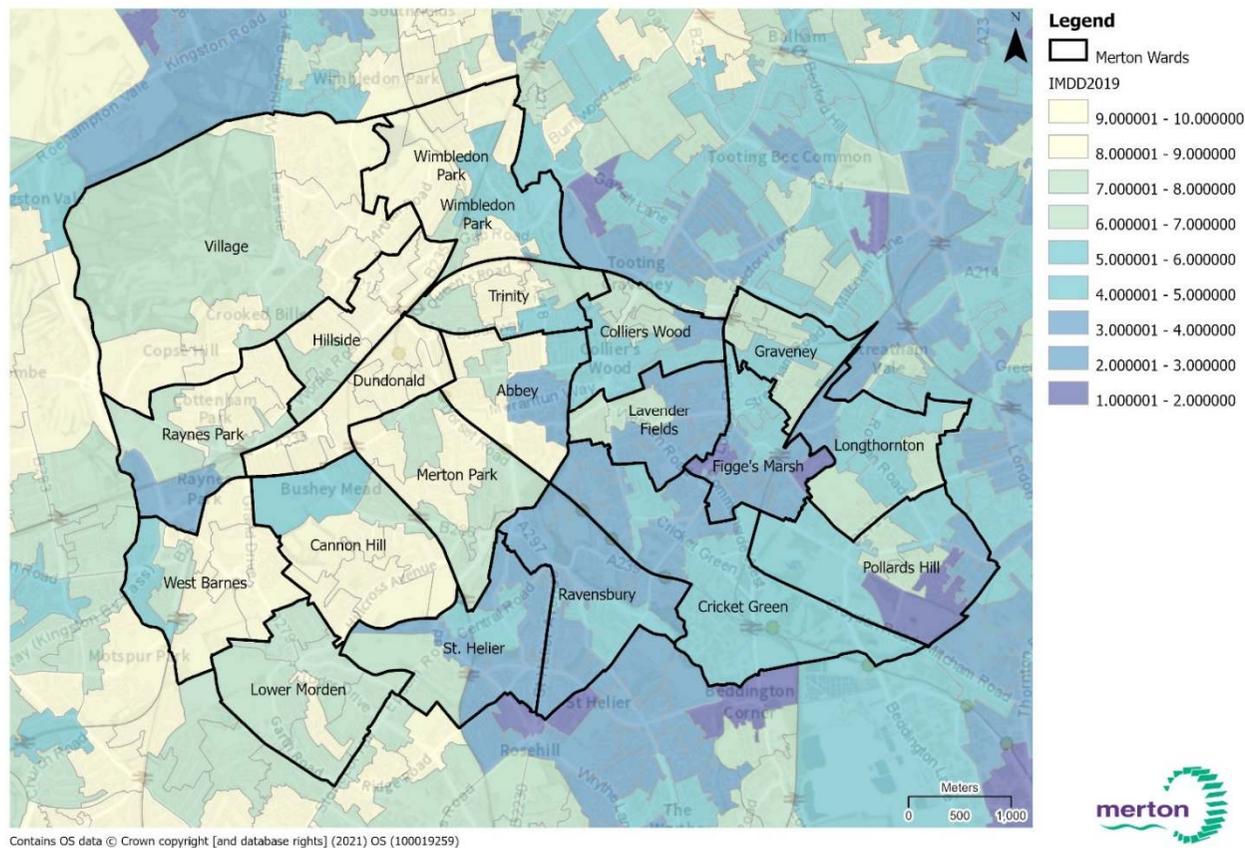


Source: ONS Census 2011

## Index of Multiple Deprivation

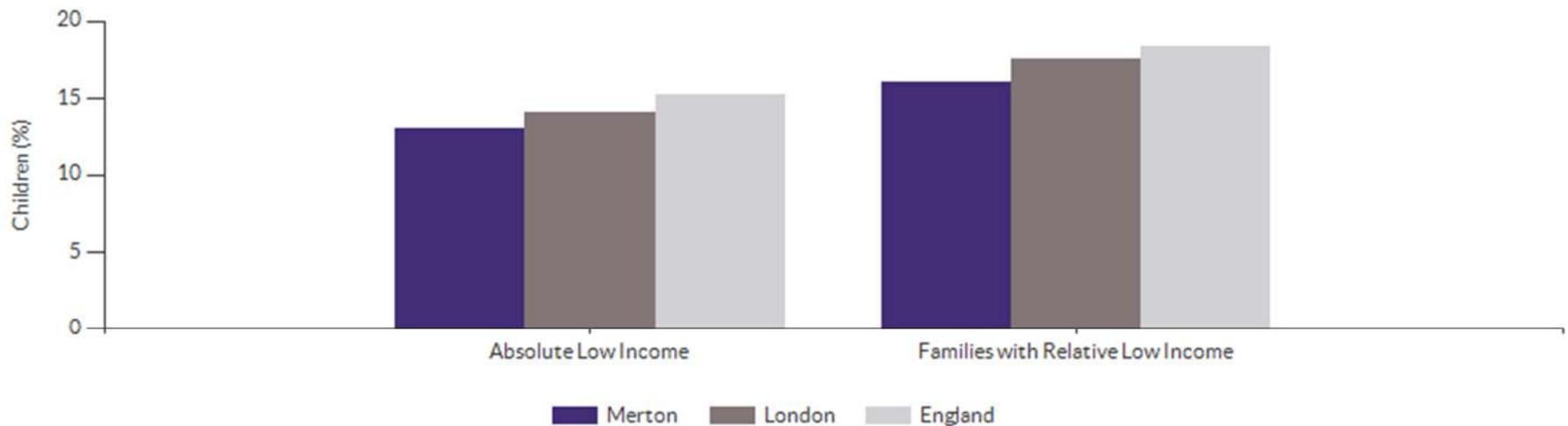
8.53 The Index of Multiple Deprivation (IMD) combines information from seven domains to produce an overall relative measure of deprivation. The domains are Income; Employment; Education; Skills and Training; Health and Disability; Crime; Barriers to Housing Services; Living Environment. Each domain is given a weighting and is based on a basket of indicators.

Figure 56: Indices of deprivation in Merton by wards



- 8.54 The Index of Multiple Deprivation (IMD) 2019 is the official measure of relative deprivation for small areas (or neighbourhoods) in England. The IMD ranks every small area (Lower Super Output Area) in England from 1 (most deprived) to 32,844 (least deprived). For larger areas we can look at the proportion of LSOAs (Local Super Output Areas) within the area that lie within each decile. Decile 1 is the most deprived 10% of LSOAs in England while decile 10 shows the least deprived 10% of LSOAs.
- 8.55 Merton ranks as 'very low' in terms of overall social deprivation compared to other London boroughs and nationally in the UK. It is the sixth least deprived of the 33 London boroughs and ranks 114th out of 326 authorities (where 1 is the most deprived) in England. This overall lack of deprivation does, however, hide inequalities and extremes in the borough between deprived wards in the east of the borough that are some of the top 15% most income-deprived in the country, and the more affluent wards in the west that are amongst the top 5% most affluent. Three wards are more deprived than the average for London: Cricket Green, Figges Marsh and Pollards Hill.

Figure 57: Children in low income families

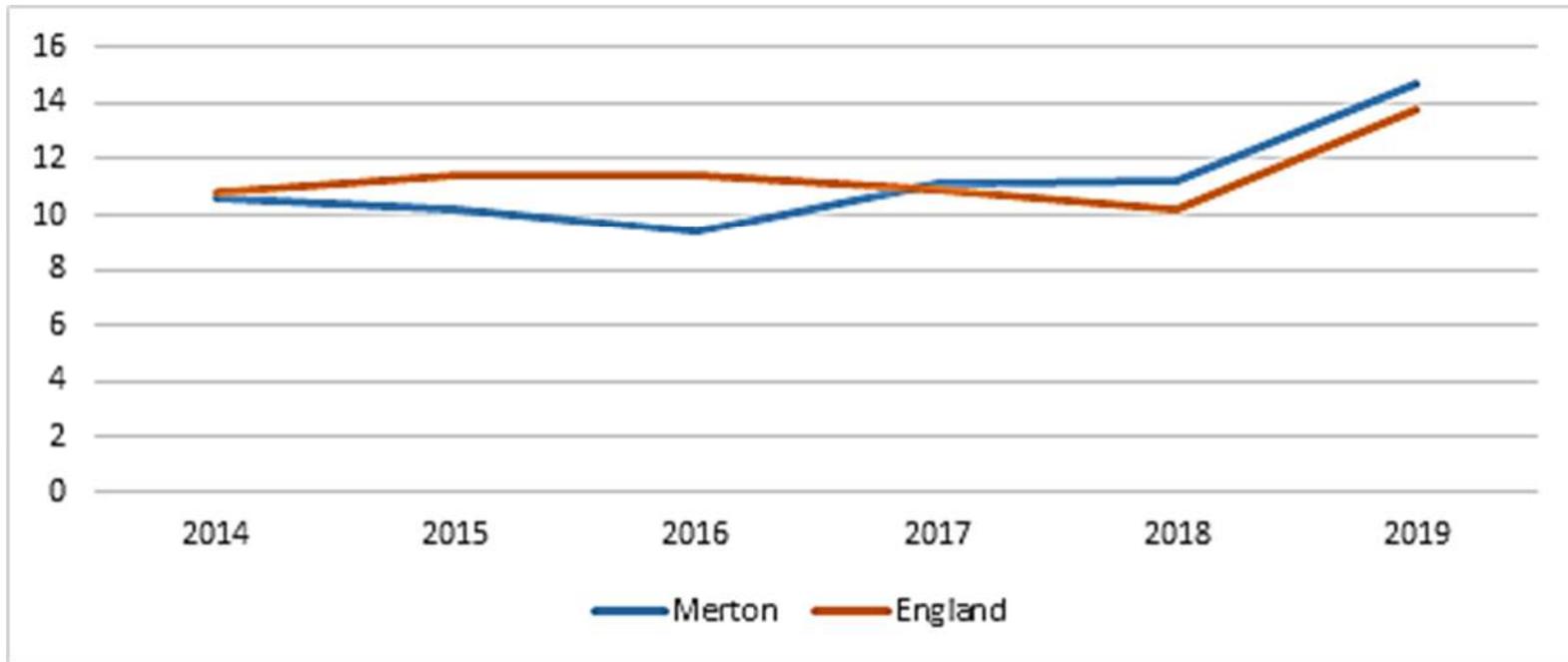


Date: 2018-2019 Source: DWP/ONS

## Fuel Poverty and excess winter mortality

8.56 Low income combined with high energy costs is linked to homes that are not heated sufficiently. A household is *fuel poor* if the fuel costs of the household are above average (the national median level) and, were they to spend that amount, the residual income would drop below the poverty line. Fuel poverty is more prevalent in inner London boroughs and lessens in outer London. 14.7% of households in Merton were in Fuel Poverty as of 2019, similar to both London and England (table 6.5). However, this has increased since 2015 from 10.2%, and similar trends have been seen nationally<sup>14</sup>.

Figure 58: percentage of household in fuel poverty<sup>15</sup>

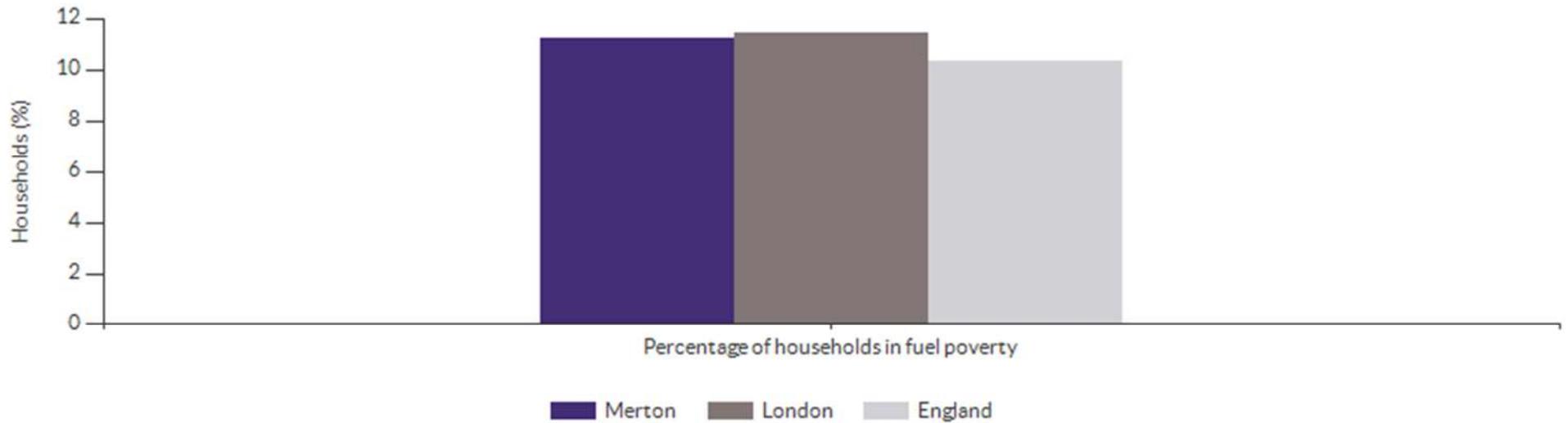


<sup>14</sup> [https://lginform.local.gov.uk/reports/lgastandard?mod-area=E09000024&mod-group=AllRegions\\_England&mod-metric=2131&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lgastandard?mod-area=E09000024&mod-group=AllRegions_England&mod-metric=2131&mod-type=namedComparisonGroup)

<sup>15</sup> [https://lginform.local.gov.uk/reports/lgastandard?mod-metric=2131&mod-area=E09000024&mod-group=AllBoroughInRegion\\_London&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lgastandard?mod-metric=2131&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup)

8.57 Fuel poverty is often a greater concern for elderly populations. Merton has a high level of people aged over 65 receiving winter fuel payments (95.3%) and low levels of older people living in deprivation (16.1%). Levels of deprivation for older people are considerably lower in Merton compared to the London average<sup>16</sup>.

Figure 59: household in fuel poverty

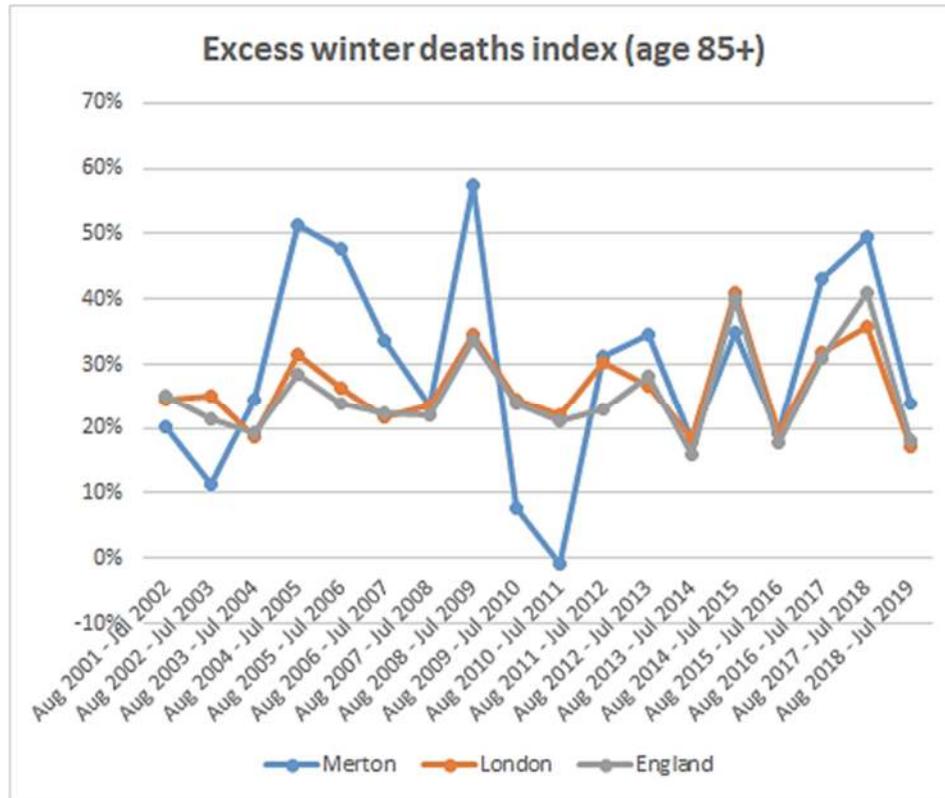


Date: 2018 Source: BEIS

<sup>16</sup> [https://qinform.local.gov.uk/reports/qastandard?mod-metric=381&mod-area=E09000024&mod-group=AllBoroughInRegion\\_London&mod-type=namedComparisonGroup](https://qinform.local.gov.uk/reports/qastandard?mod-metric=381&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup)

8.58 During the 2017/18 there were 49.4% excess winter deaths\* in the borough. This is substantially higher than the London (35.8%) and national (41.1%) levels for the same period.

Figure 60<sup>3</sup>: Excess Winter Deaths Index (EWD Index)



\*Excess winter deaths are calculated as winter deaths minus the average non-winter deaths

\*\*EWD is the excess winter deaths measured as the ratio of extra deaths from all causes that occur in all those aged 85 and over in the winter months compared with the expected number of deaths, based on the average of the number of non-winter deaths in those aged 85 and over<sup>17</sup>.

<sup>17</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/methodologies/mortalitystatisticsinenglandandwalesqmi>

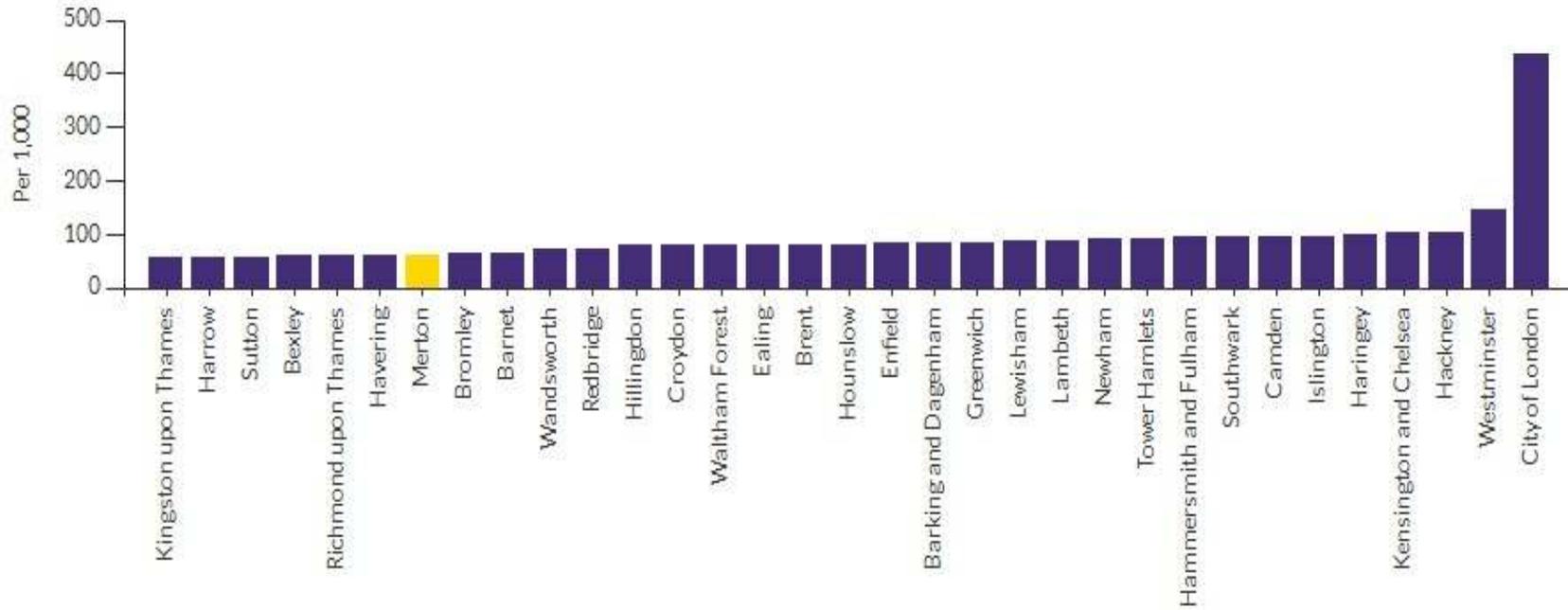
## Crime

- 8.59 The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing. Overall Merton is a safe borough with a crime rate below both the London and England average. Merton compares well to both the London and England average on a range of indicators including children in the youth justice system, first time entrants to the youth justice system, violent sexual crimes and % of offenders reoffending. However, Merton performs less well in terms of hospital admissions due to violent crime with 61.6 admissions per 100,000 people. Crime rates in Merton initially dropped during the first lockdown before rising again through the summer and falling again during the winter lockdown. Crime has now returned to pre-pandemic levels.
- 8.60 According to the 2019 Residents Survey, most residents living in the borough feel safe in their local area, both during the day (98%) and at night (84%). Merton compares well against the national figures collected by the LGA (Local Government Association) in October 2018 when 76% of residents felt safe after dark and 93% felt secure during the day.
- 8.61 Feelings of daytime safety are consistent across the key demographics, however as night approaches certain residents become more concerned about their safety:
- Residents of East Merton and Mitcham, 75% feel safe after dark
  - Those living in North East Merton, 76% feel safe after dark
  - Women, 78% feel safe after dark
  - Those aged 65 or over, 73% feel safe after dark
  - Disabled residents, 74% feel safe after dark
  - Those economically inactive, 75% feel safe after dark
- 8.62 Certain groups in Merton are over-represented in crime statistics compared to the London average. Under 18s make up 27% of sexual offence victims although they only make 23% of Merton's population. Similarly, the black population in Merton are over-represented as victims of sexual offences (17%) and domestic violence (15%).<sup>18</sup>

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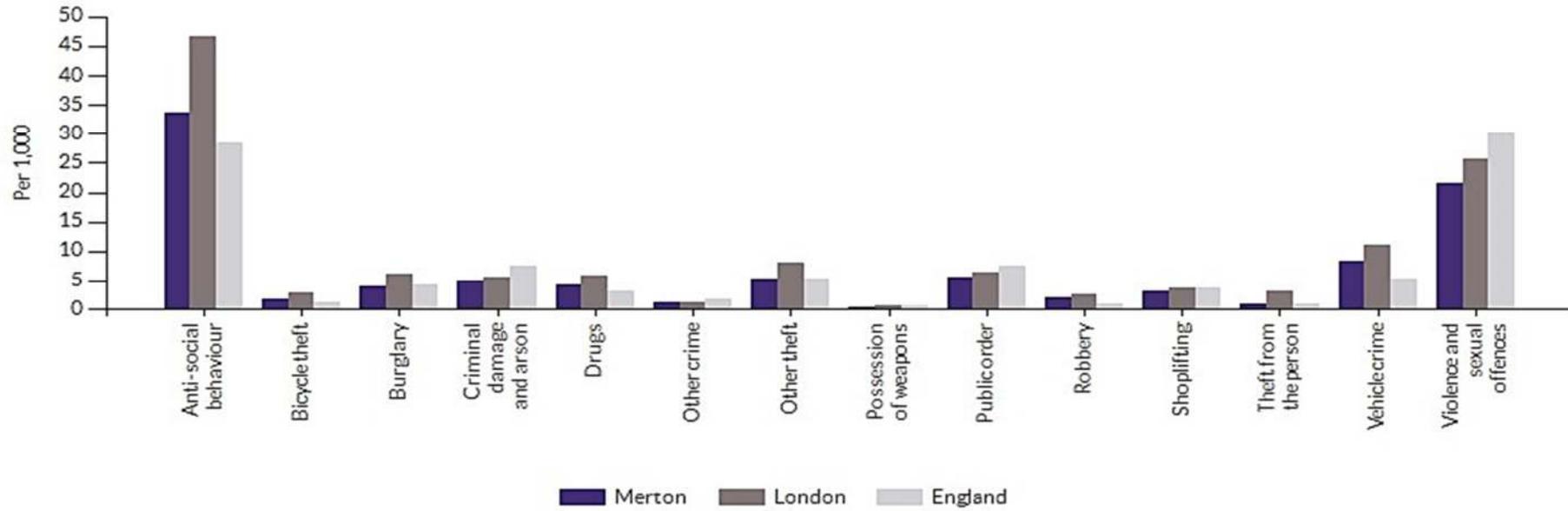
<sup>18</sup> [https://www.london.gov.uk/sites/default/files/annex\\_1\\_-\\_evidence\\_pack.pdf](https://www.london.gov.uk/sites/default/files/annex_1_-_evidence_pack.pdf)

Figure 61: Overall crime rate by offences



Date: May-20 - Apr-21 Source: data.police.uk

Figure 62: Crime rate by type of crime



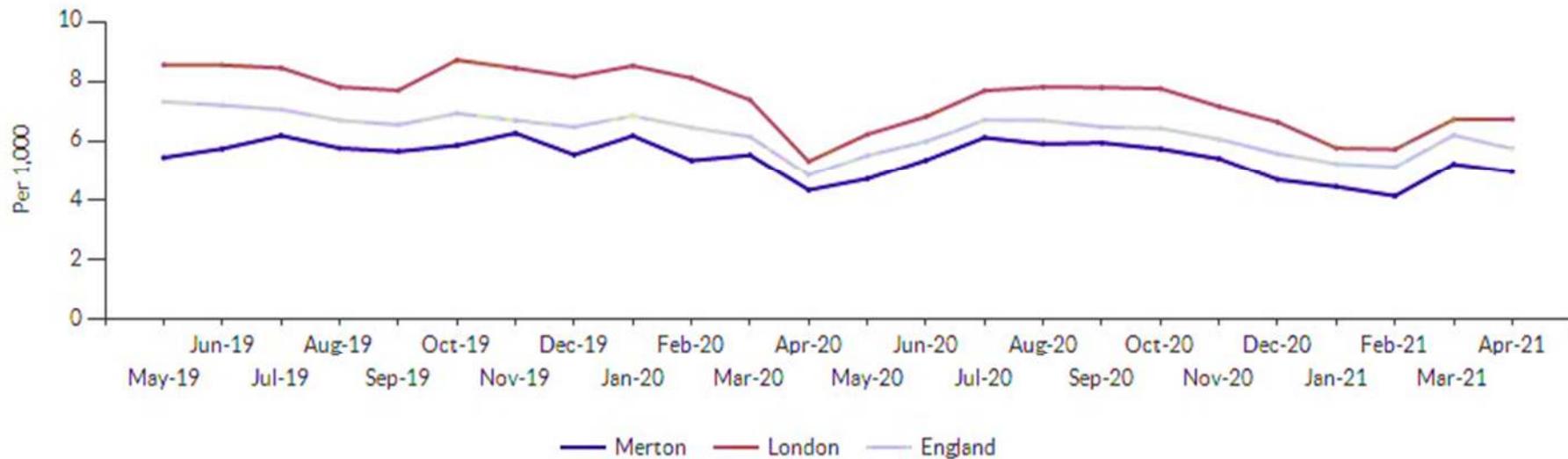
Date: May-20 - Apr-21 Source: data.police.uk

Figure 63: Crime by type of offences (count and percentage)

Offences	Merton	
	Count per 1000	%
Anti-social behaviour	6,952	33.7
Bicycle theft	370	1.8
Burglary	835	4
Criminal damage and arson	1,010	4.9
Drugs	842	4.1
Possession of weapons	90	0.4
Public order	1,121	5.4
Robbery	408	2
Shoplifting	621	3
Theft from the person	176	0.9
Other theft	1,104	5.3
Vehicle crime	1,721	8.3
Violence and sexual offences	4,456	21.6

Public disorder and weapons	528	2.6
Violent crime	2,382	11.8
Other crime	210	1

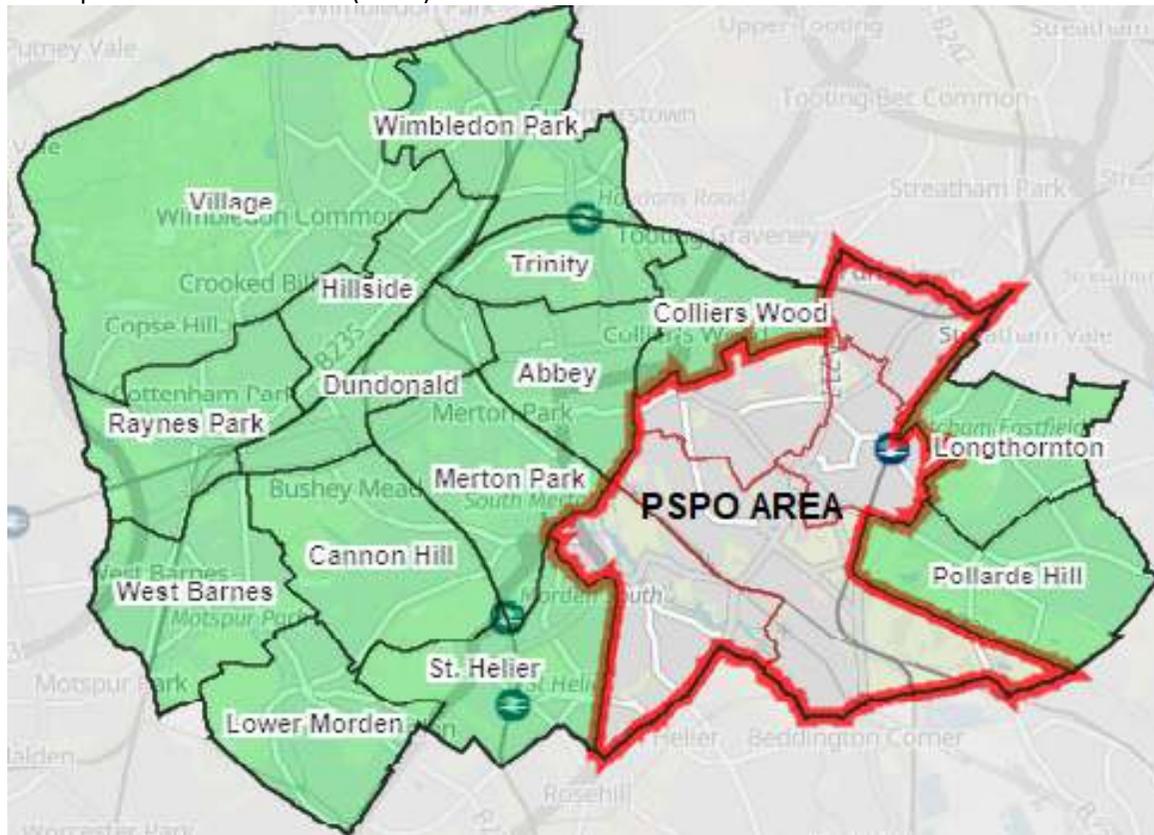
Figure 64: Overall crime rate change



Source: data.police.uk

8.63 The wards of Cricket Green, Figges Marsh, Graveney, Lavender Fields and Ravensbury are all part of a Public Space Protection Order (PSPO) area. These PSPOs have been brought in as a tool to address anti-social alcohol related behaviour in the affected areas.

Figure 65: Public Space Protection Order (PSPO) Areas in Merton

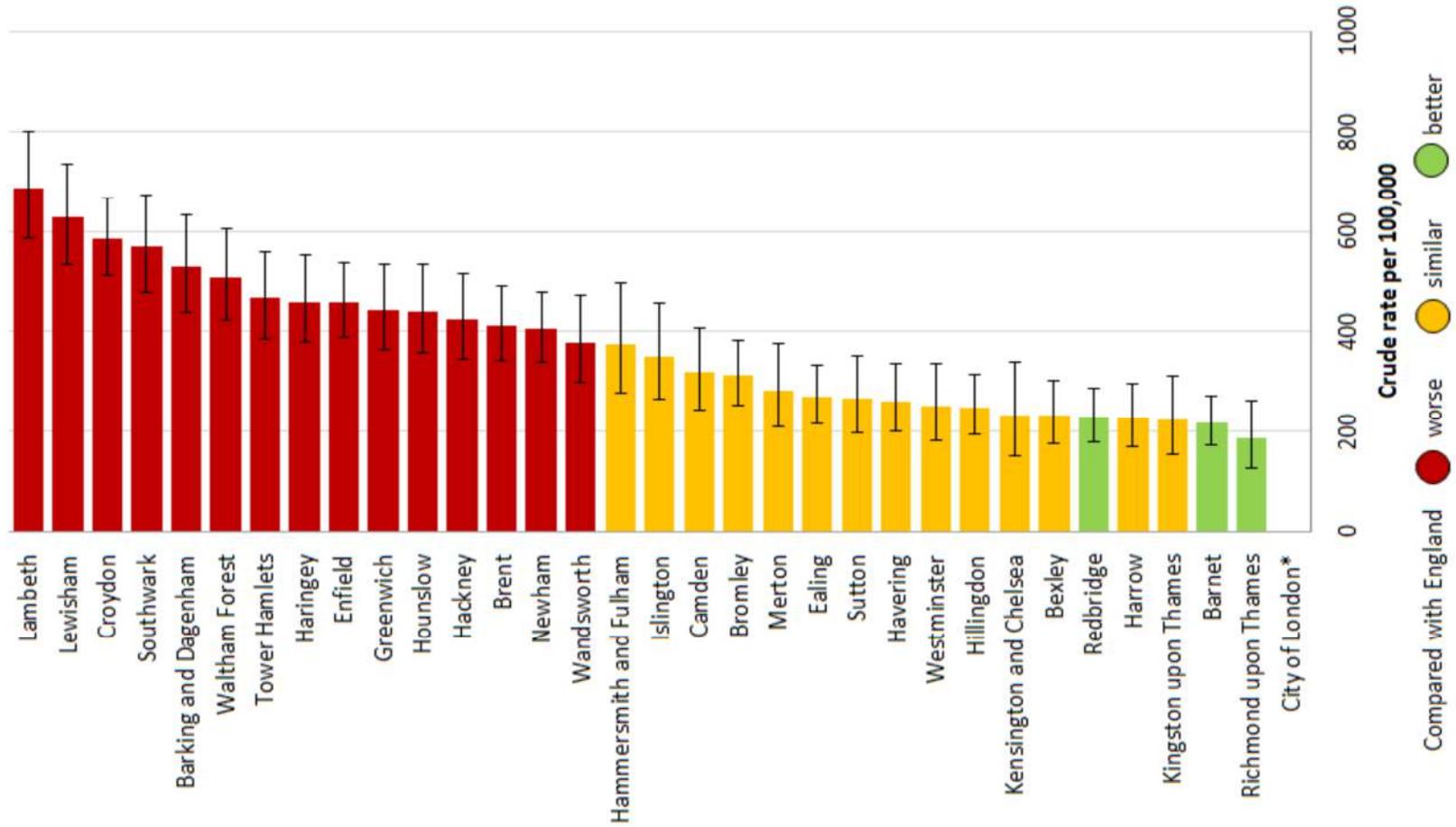


*First time entrants to the youth justice system*

- 8.64 Children and young people at risk of offending or within the youth justice system often have more unmet health needs than other children. This indicator is included to ensure that vulnerable children and young people (aged 10-17) at risk of offending, are included in mainstream planning and commissioning. Data are collected from the Police National Computer.
- In 2017, London had a significantly higher rate of first-time entrants to the youth justice system – 380 compared to 293 per 100,000 residents in England.

- The London rate has however fallen by more than half compared to baseline in 2010. Although this decrease had tapered off in recent years the rate for London fell by more than 7% compared to the previous year (2016).
- Only Richmond upon Thames (185 per 100,000), Barnet (218) and Redbridge (228) had a significantly lower rate than England.

Figure 66: First time entrants to the youth justice system by borough



\* Not calculated due to small numbers

## Transport infrastructure

### *Railway*

- 8.65 Merton being in the south London sub region the borough relies on the rail network more than the underground network for commuting to London and surrounding areas. There are over 11 railway stations found in the borough, all linking to Wimbledon station which is the largest of the station in the borough. The average journey time from Wimbledon to central London (Waterloo Station) is 10-15 minutes.

### Underground (tube) and tram

- 8.66 Merton has two underground lines services, the Northern Line and District Line, both terminating in the borough the Northern Line at Morden and the District Line at Wimbledon; with the northern line stations providing night service on Fridays and Saturday's. Both underground lines provide links to central London and other major London railway stations.
- 8.67 Within Merton a tram service runs from Wimbledon to Croydon, connecting the centre of the borough to the east. The tram service also has interchanges with the rail network at Wimbledon and Mitcham Junction station.

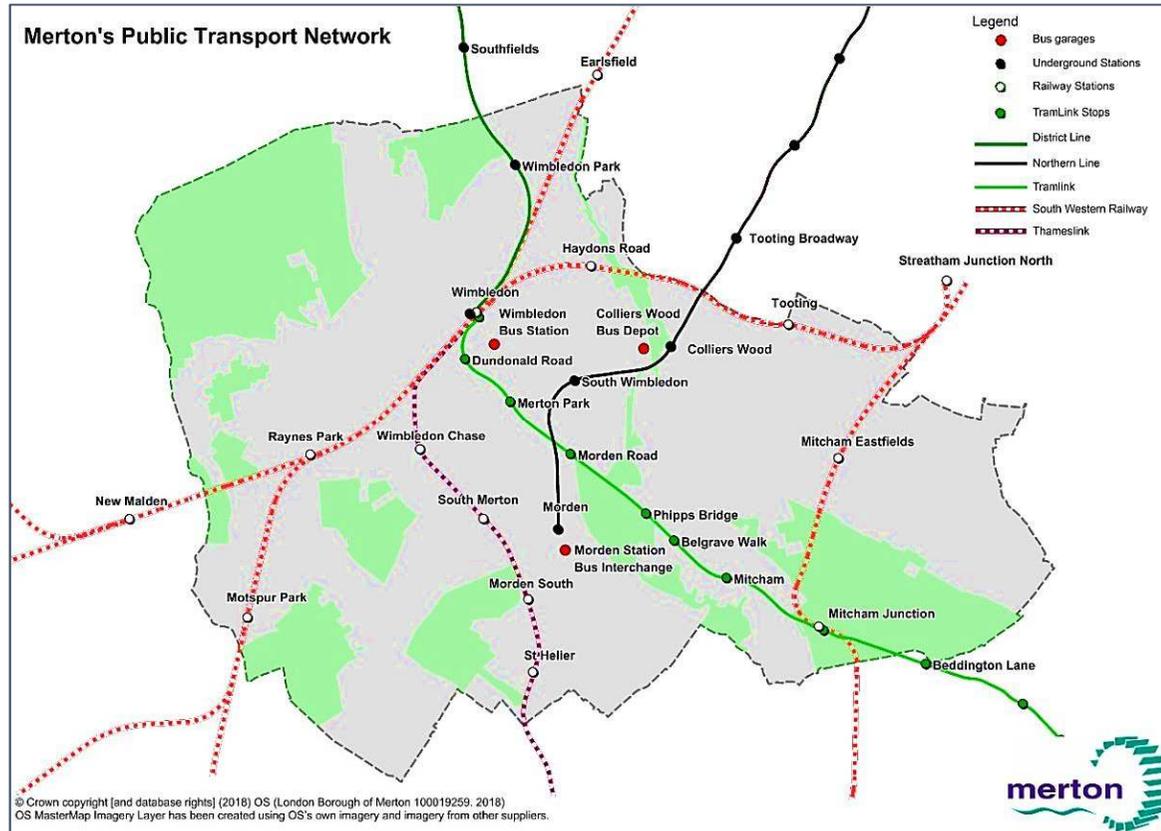
### Bus

- 8.68 London Buses are operated by Transport for London (TfL), who manage the bus service in London, plan routes, specify service levels and monitor service quality. London Buses is also responsible for the siting of bus stops and other support services. Merton is served by 29 bus routes, 6-night bus services and 3 24-hour bus services serving the 3 main town centres in the borough.

### Public Transport Accessibility Levels (PTAL)

- 8.69 As with other outer London borough Merton has higher PTAL levels near and around the town centre of Wimbledon (PTAL of 6b, excellent), Morden (PTAL of 6a very good) and remaining range from PTAL of 4- 5 (good). Appendix 1 Maps identifies the PTAL in across Merton.

Figure 67: Merton Public transport network



### Road network

8.70 Most roads in the Merton are unclassified. However, 30 kilometres of classified 'A' roads, 48 kilometres of classified B and C roads and 10 kilometres of TRLN. Certain roads in the borough have been designed as strategic routes and include major roads, which despite still being the responsibility of the borough, gives additional powers to the Mayor and TfL to work with the council to minimise disruption caused by road works.

- 8.71 Merton has no motorway only a Trunk Road which is a small section of the A3, which along with the Red Route Network forms part of the Transport for London Road Network (TLRN) and is the responsibility of Transport for London (TfL).
- 8.72 Most roads in the borough are unclassified. However, 30 kilometres of classified A roads, 48 kilometres of classified B and C roads and 10 kilometres of TRLN. Certain roads in the borough have been designed as strategic routes and include major roads, which despite still being the responsibility of the borough, gives additional powers to the Mayor and TfL to work with local Boroughs to minimise disruption caused by road works.

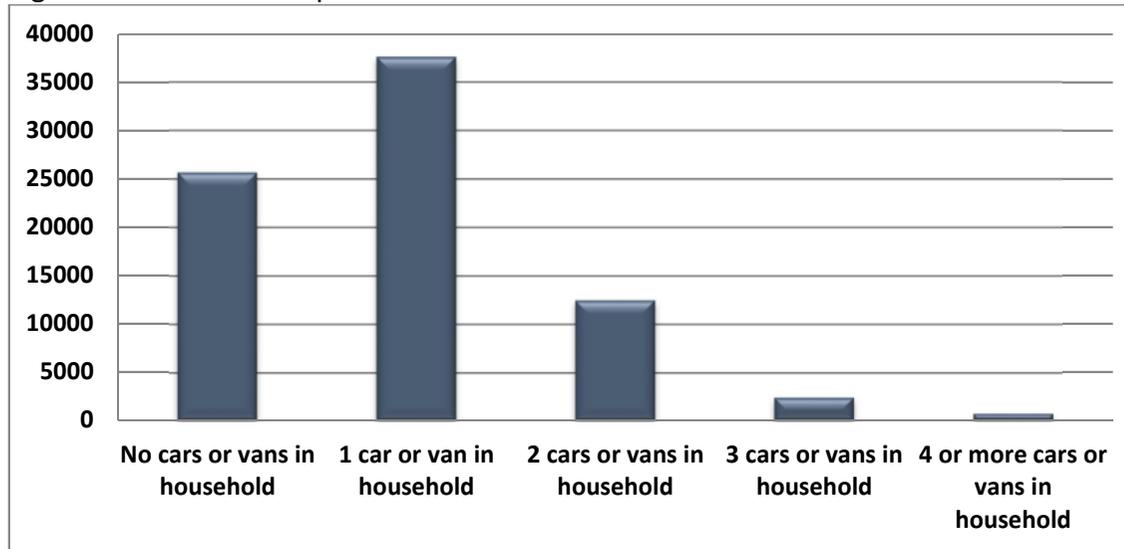
### **Transport use patterns**

- 8.73 In Merton the number of people who either walking, cycling or use public transport is around 58%, showing a falling trend compared to previous years (down from 61%). Merton's figure is just below the London average of 62%. All trips per day by main mode for the periods from 2014/15 to 2016/17.
- 8.74 The pandemic had a sudden and dramatic impact on travel demand as a direct consequence of the shock to economic and social activity imposed by the lockdown of March 2020 and the associated social distancing requirements. The demand for travel not only fell to a fraction of its usual amount in a matter of days; it was transformed in many other ways, too. The timing of journeys changed, and so did in many cases their destinations, creating a shift towards more local travel. Finally, people's attitudes to the different modes quickly changed, reflecting the challenges brought by the pandemic, and with that their travel choices and behaviours. Following the easing of lockdown restrictions during the summer, some aspects of travel recovered, although the pace and nature of recovery also differed.

#### *Car ownership*

- 8.75 As with other outer London boroughs the private car retains a leading role in meeting travel demand with around 43% of daily trips by car. There are currently around 78,497 cars in Merton or roughly one car per household. Car ownership is up from previous years. The highest car ownership can be found in Village Ward (1.4 cars per household) dropping to 0.7 car per household at the other end of the range. The areas with the highest car ownership generally coincide with areas of poor connectivity

Figure 68: Car ownership in Merton

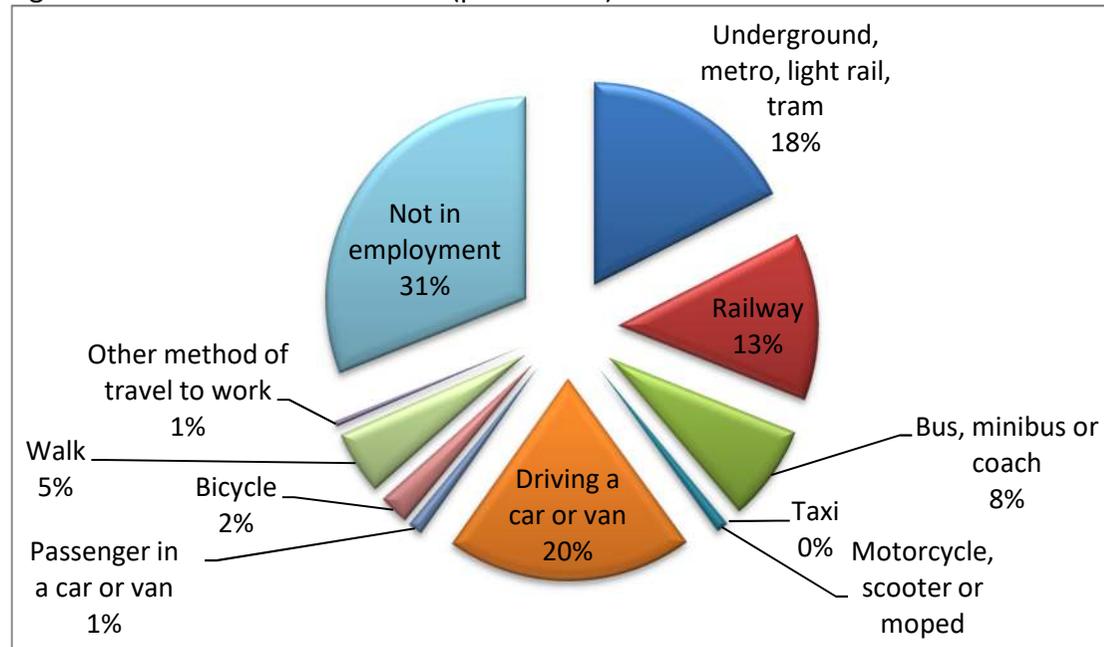


Source 2011 Census

8.76 Figures now shows that, an average of 32% of households have no car (2014/15 -2016/17) Local Demand Travel Survey data identified a slight decrease on previous years. However, this has been offset by an increase in households with 2 or more cars (up to 18.6%).

## Travel to work

Figure 69: Mode of travel to work (pre- COVID)

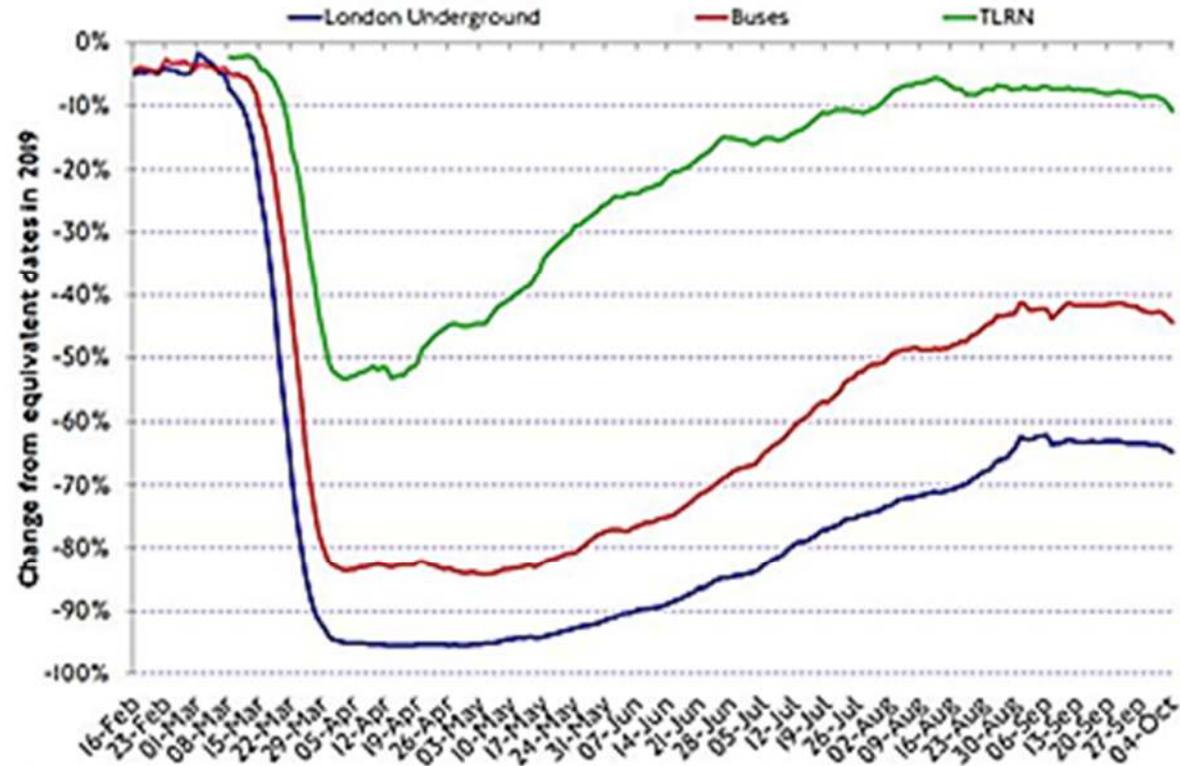


Source: Census 2011

## Road safety

- 8.77 In 2019 there were 165 casualties in Merton involving pedestrians or cyclists with 3 of these being fatal. This rose to 175 in 2020 with 2 fatal casualties. Casualties fell sharply in March 2020 during the first lockdown but quickly returned to comparable levels to previous years. The pandemic had a sudden and dramatic impact on travel demand as a direct consequence of the lockdown of March 2020 and the associated social distancing requirements. The timing of journeys also changed, and so did destinations, shifting towards local travel. Following the easing of lockdown restrictions during the summer, some aspects of travel recovered, but have not still returned to pre-pandemic levels

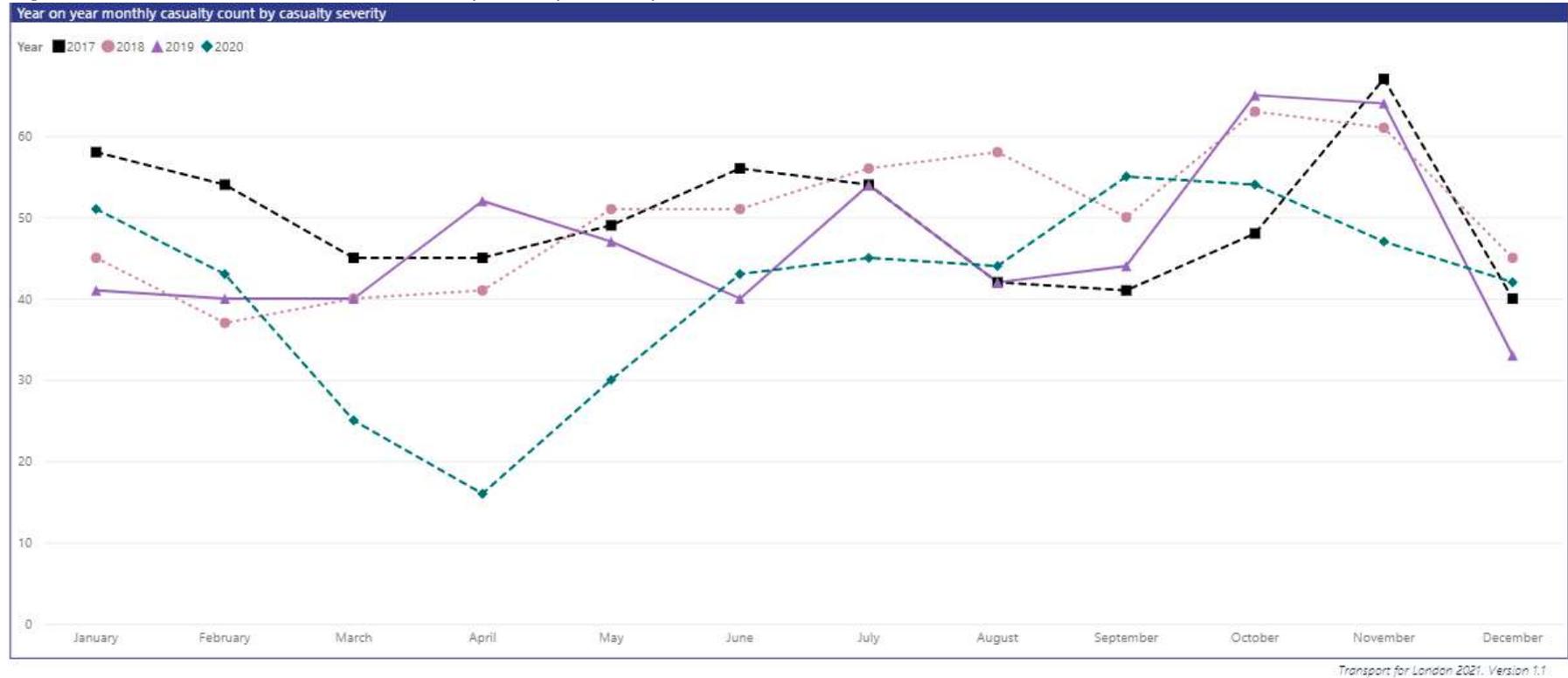
Figure 70: Demand on London Underground, Buses and Transport for London Road Networks (TLRN) in London, 7-day moving average, 2020 vs 2019



Source: TfL Technology & Data, TfL Surface Transport.  
 Note: No bus data available 20 Apr-28 Jun due to changes to ticket validation. The values provided are estimates.

8.78 In 2020 there were 495 total traffic collisions in Merton compared to 562 in 2019. The number of traffic collisions fell sharply during the first lockdown before gradually rising through the summer and autumn. Collisions had returned to pre-pandemic levels by December 2020.

Figure 71: Total traffic casualties in Merton, year on year comparison<sup>20</sup>



<sup>19</sup><https://app.powerbi.com/view?r=eyJrIjoieTYkYmE1ZGQ0NGlyZi00N2YyLWVlWEVMTY1MjYzNzA5YTVkOWEzIiwidCI6IjFmYmQ2NWJmLTkxZWY1NGVlYS1hNjkyLWVlODIjMjU1MzQ2Y1IsImMiOiIh9>

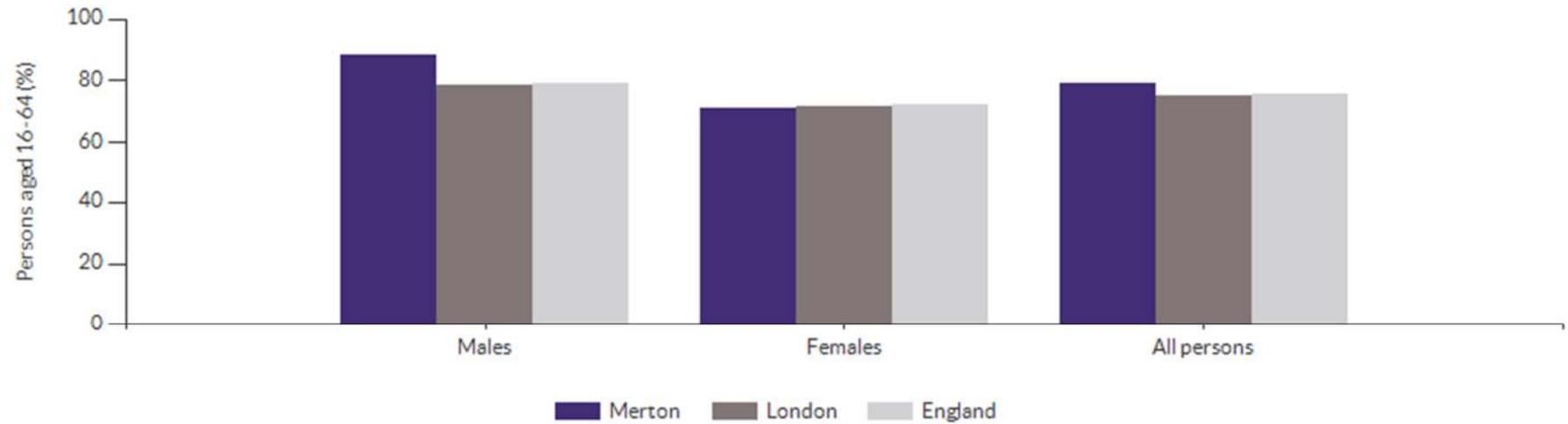
<sup>20</sup><https://app.powerbi.com/view?r=eyJrIjoieTYkYmE1ZGQ0NGlyZi00N2YyLWVlWEVMTY1MjYzNzA5YTVkOWEzIiwidCI6IjFmYmQ2NWJmLTkxZWY1NGVlYS1hNjkyLWVlODIjMjU1MzQ2Y1IsImMiOiIh9>

## Economic baseline data

### Employment and income

- 8.79 Merton residents who are in active full-time employment are distributed all over the borough however, unemployed residents are concentrated towards the east of the borough and self-employed residents tend to be concentrated toward the west of the borough.
- 8.80 Population projections identify a smaller increase in the working age population by 2025 than both the younger and the older populations. This is likely to mean increasing numbers of middle-aged people coping with the competing demands of looking after both young children and older parents, as well as having implications for the comparative size of the future health and care workforce. Merton residents who are in active full-time employment are distributed all over the borough however, unemployed residents are concentrated towards the east of the borough and self-employed residents tend to be concentrated toward the west of the borough.
- 8.81 Merton has the third highest economic activity rate for persons aged 16-64 of all the London boroughs (86%). The employment rate for the borough as of September 2020 is 80.7%, higher than the London average of 75.2%. Unemployment in the borough is 6.2% in September 2020, above the London average of 5%. The median gross annual pay for residents in Merton as of 2020 is £32,197, slightly below the London average of £32,533.

Figure 72: Employment rate in Merton

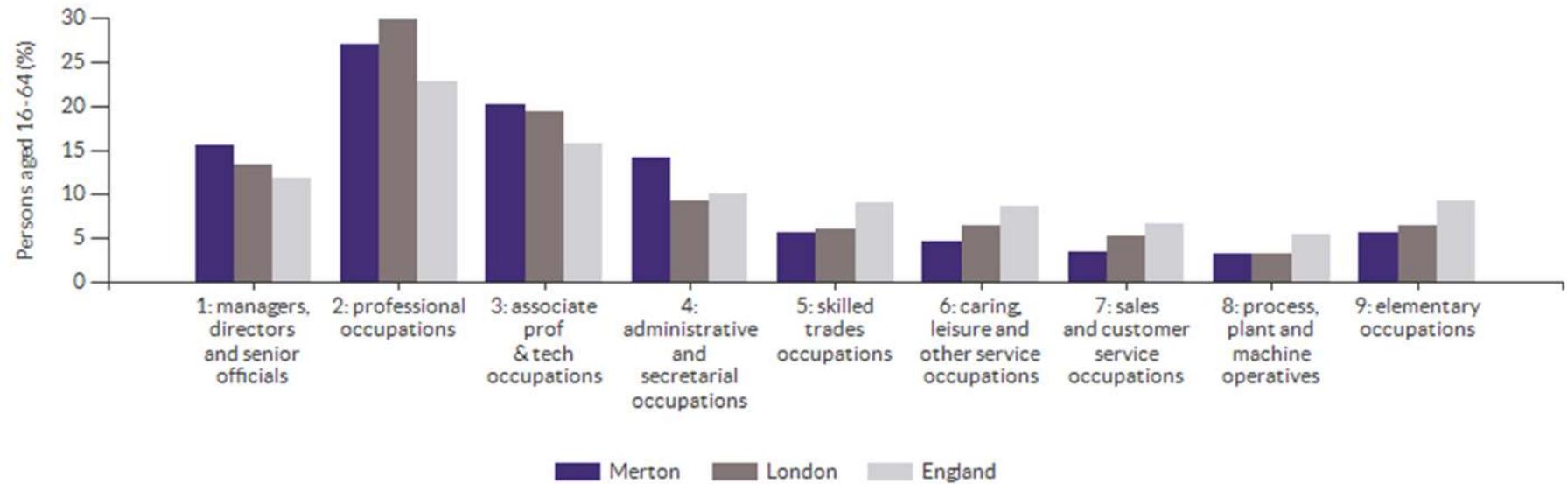


Date: 2020-12 Source: ONSAPS

8.82 The top three industry of employment in Merton are as follows:

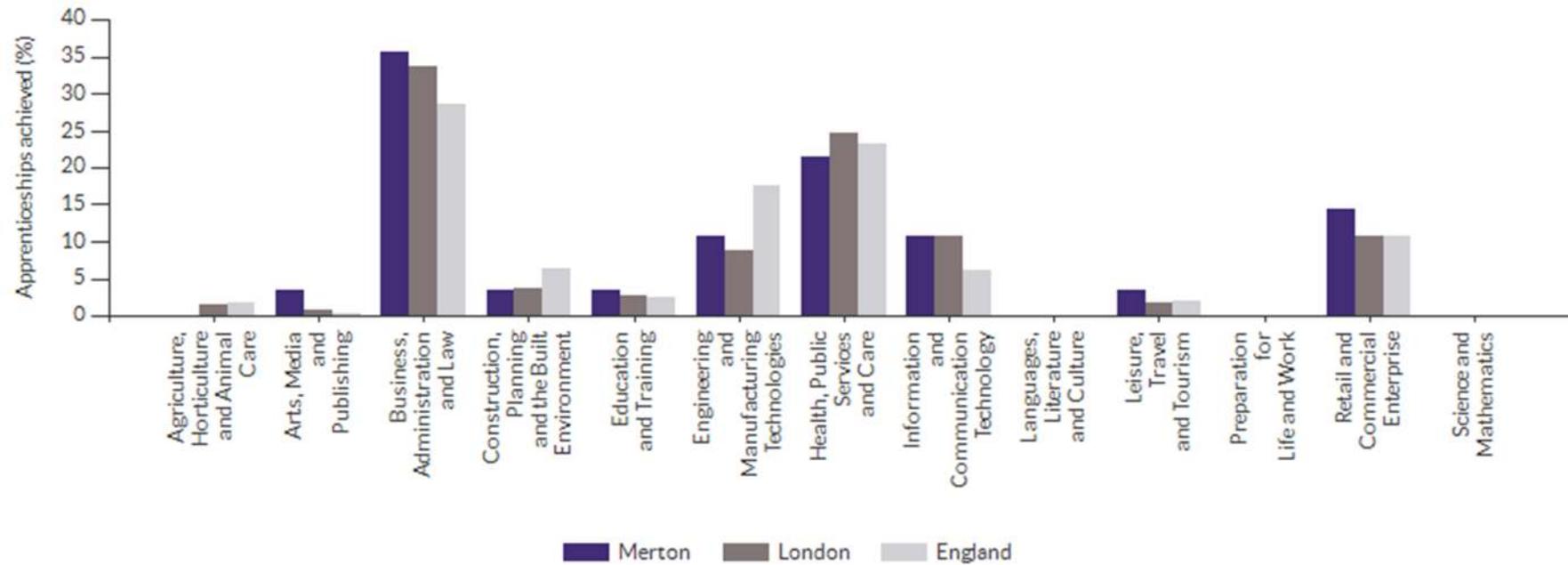
- 16% Admin and service support
- 15% managers, directors and senior officials
- 27% Professional, scientific and technical activities

Figure 73: employment sectors in Merton



Date: 2020-12 Source: ONSAPS

Figures 74: Apprenticeships in Merton



Date: 2019-2020 Source: DfE

Figure 75: Work patterns



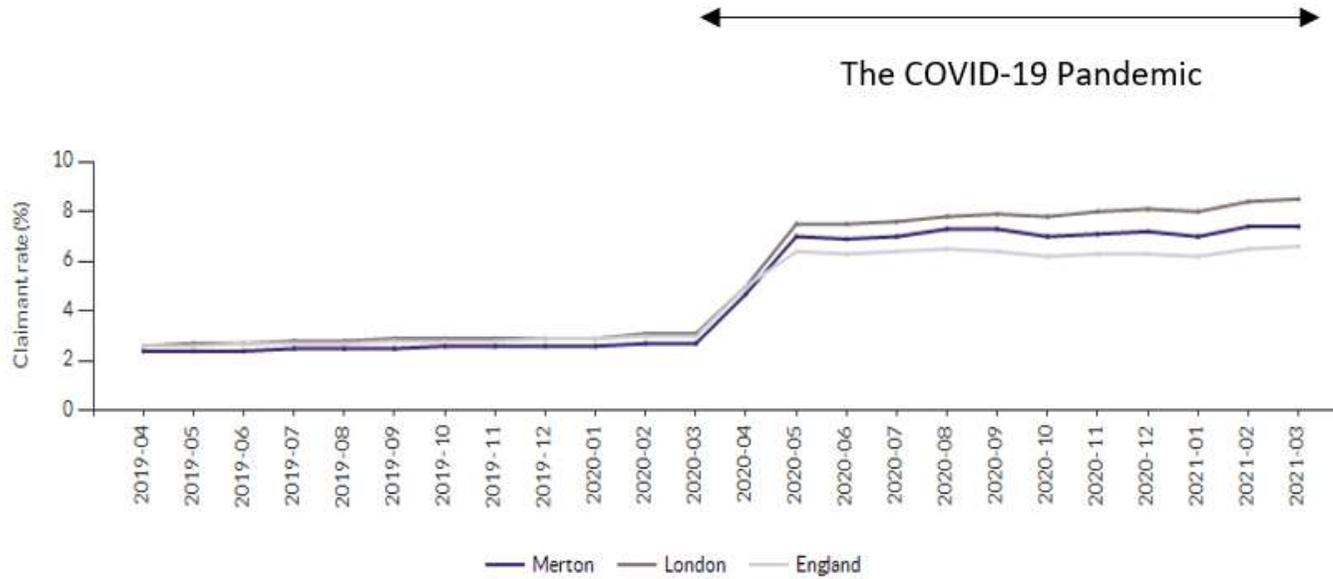
Date: 2020 Source: ONSASHE

- 8.83 The Annual Survey of Hours and Earnings (ASHE) is conducted in April each year to obtain information about the levels, distribution and make-up of earnings and hours worked for employees. This data set provides information about earnings of employees who are living in an area, who are on adult rates and whose pay for the survey pay-period was not affected by absence. ASHE is based on a sample of employee jobs taken from HM Revenue & Customs PAYE records. Information on earnings and hours is obtained in confidence from employers. ASHE does not cover the self-employed nor does it cover employees not paid during the reference period
- 8.84 Unemployment in Merton as of December 2020 stood at 6.2%, higher than the London (6%) and England (4.8%) averages (Table 6.3). This is an increase from 5.8% from April 2020 at the onset of the pandemic<sup>21</sup>. The pandemic has also changed the amount of people claiming either job seekers allowance or universal credit in Merton. Figure 6.10 shows the rise in the total claimant rate (those claiming either job seekers allowance or universal credit) in Merton rising from 2.7% in March 2020 to 7.4% in March 2021.

<sup>21</sup> [https://www.nomisweb.co.uk/reports/lmp/la/1946157274/subreports/ea\\_time\\_series/report.aspx?](https://www.nomisweb.co.uk/reports/lmp/la/1946157274/subreports/ea_time_series/report.aspx?)

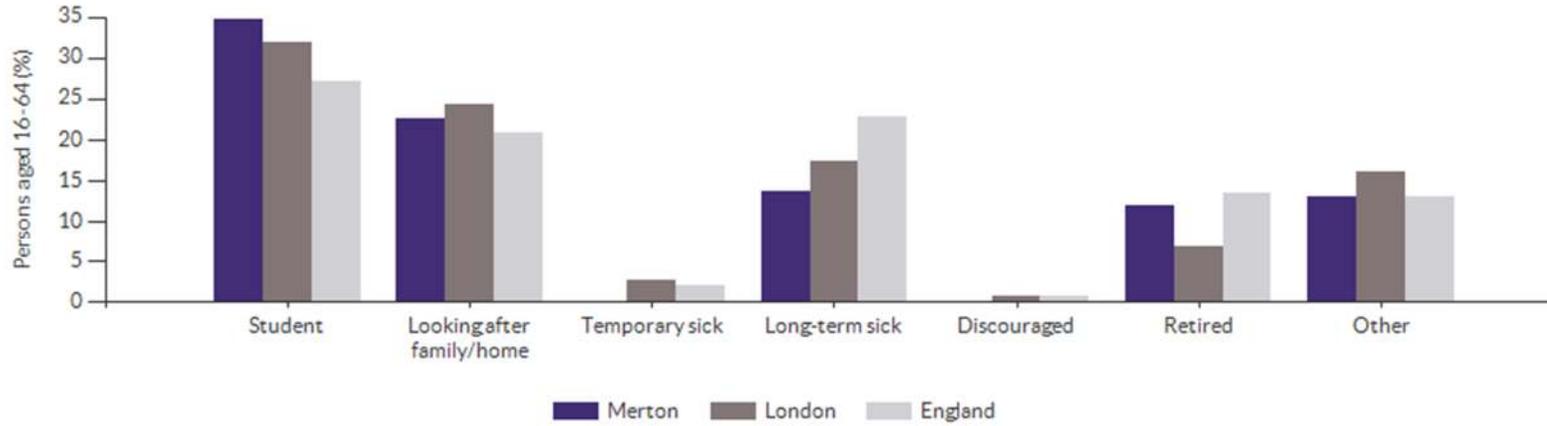
The rise in the claimant rate has been highest in the east of the borough with Figges Marsh, Pollards Hill and Cricket Green wards having a claimant rate of approximately 12% compared to 2.7% in Wimbledon Village

Figure 76: Claimant rate % in Merton, London and England



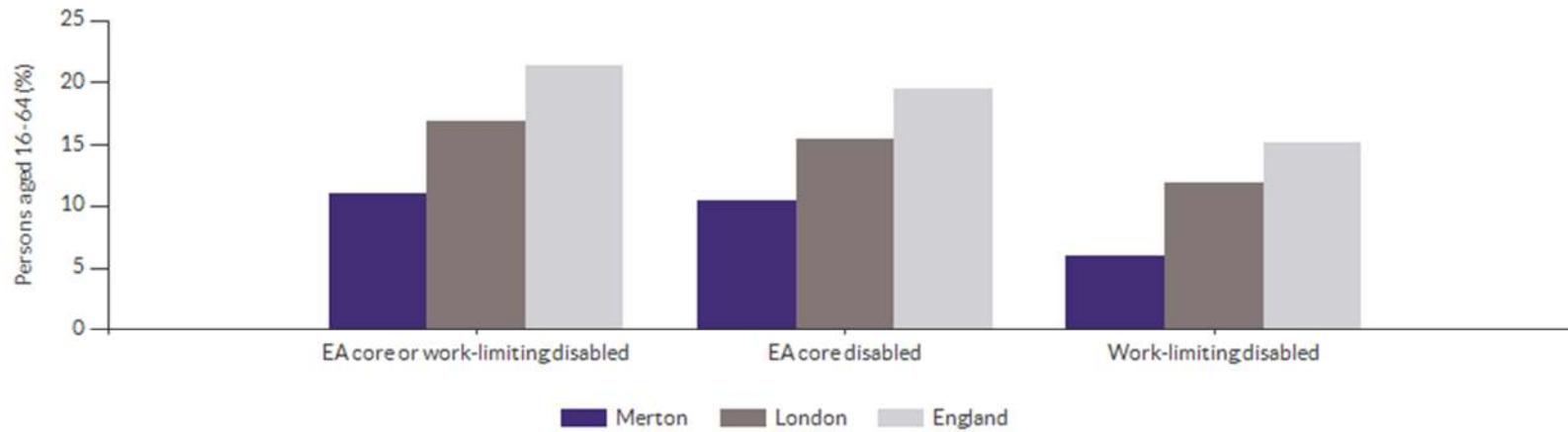
Source: ONS

Figure 77: Economic inactivity by reason



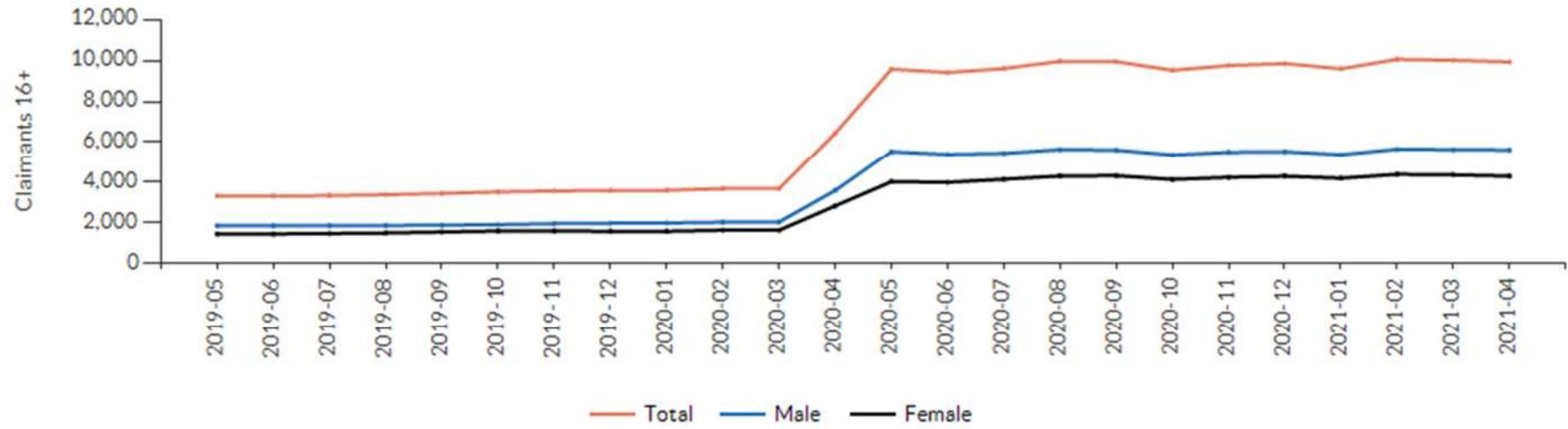
Date: 2020-12 Source: ONSAPS

Figure 78: Disability (Equality Act) core level



Date: 2020-12 Source: ONSAPS

Figure 79: Monthly claimant counts



Source: ONS

## Appendix B: Summary of policy changes since draft stage 2a

Figure X: Summary of policy changes in the draft plan – all policy has been given a new number this is due to a rearrangement of where the chapters sit in Plan for example the Climate Change policies have moved the front of the plan this triggered number changes for every policy.

Policy Title as at Stage 2a	What has happened to get to Stage 3?
<b>Strategic Policy H4.1: Housing Choice</b>	Changes made to ensure greater conformity with the London Plan. Also, greater clarity added regarding definition of affordable housing tenures and calculation of cash in lieu in justificatory text (JT).
Strategic Policy H4.2: Housing Provision	Same policy direction – changes to now reflect the published London Plan housing target for Merton. Justification setting out the trajectory approach to delivery of the target.
Policy 4.3 Housing Mix	Very minor change to improve clarity.
Policy H4.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.	Very minor changes to improve clarity.
Policy H4.5 Student housing, other housing with shared facilities and bedsits	Very minor change in the justification section
Policy H4.6 Accommodation of Gypsies and Travellers	Substantial additions in line with Merton’s 2019 Gypsies and Travellers Accommodation Assessment (GTAA) Study
Policy H4.6 Accommodation of Gypsies and Travellers	Changes made to address conformity issues raised by the GLA.
<b>Strategic Policy HW2.1 Health and wellbeing</b>	Some minor changes – linking 20 minutes neighbourhood principles and others.
Policy HW2.2 Delivering healthy places.	Minor changes for clarity.
<b>Neighbourhoods</b>	
Policy N3.1 Colliers Wood/ Surrounding area of Colliers Wood.	Same policy direction as before – minor changes for clarity
Policy N3.2 Mitcham Town Centre/	Similar policy direction – slightly more substantial changes recognising the sites coming

Surrounding area of Mitcham Town Centre	forward.
Policy N3.3 Morden/ Morden Regeneration Zone/ The Wider Morden Town Centre Area	<p>Change to policy approach - “comprehensive regeneration” is the now the preferred delivery strategy, while previously it was the only approach supported.</p> <p>The Wider Morden Town Centre Area will now be delivered through incremental change, instead of part of a plan-led approach, which will now only address the regeneration within the Morden Regeneration Zone.</p> <p>In the Wider Morden Town Centre Area, tall buildings may now only be acceptable on sites that are outside but near the Morden Regeneration Zone and the council will actively co-ordinate the details of proposed tall buildings on a case-by-case basis with reference to the numerous criteria in policies D5.1 – D5.5.</p> <p>The policy now also points out that the wider Morden Town Centre area is within an Opportunity Area.</p> <p>Numerous minor changes for clarity.</p>
Policy N3.4 Raynes Park Local Centre/ Surrounding area of Raynes Park Local Centre	Same policy direction as before – minor changes for clarity
Policy N3.6 Wimbledon Town Centre/ Surrounding neighbourhoods of Wimbledon.	Same policy direction as before – minor changes for clarity
Policy N3.5 South Wimbledon	Same policy direction as before – minor changes for clarity. Changes to the boundary of the proposed town centre (NB there are no site allocations in this policy)
Policy 0.87 Wandle Valley (formerly N3)	This row can be deleted – for Stage 2a this was published under Policy O8.7 (GBI Chapter).
<b>Strategic Policy D5.1 Placemaking and design Delivering well designed and</b>	Substantially rewritten and renamed policy.

<b>resilient neighbourhoods.</b>	
Policy D5.2 Urban design <del>and the public realm</del>	Substantially rewritten and renamed policy.
Policy D5.3 Ensuring high quality design considerations for all developments.	Substantially rewritten and renamed policy.
Policy D5.4 Alterations and extensions to existing buildings	Same policy direction as before – minor changes for clarity.
Policy D5.5 Managing heritage assets.	Same policy direction as before – minor changes for clarity.
Policy D5.6 Advertisements	Same policy direction as before – minor changes for clarity.
Policy D5.7 Telecommunications	Same policy direction as before – minor changes for clarity.
Policy D5.8 Shop front design and signage.	Same policy direction as before – minor changes for clarity.
Policy D5.9 Dwelling Conversions.	Same policy direction as before – minor changes for clarity.
Policy D5.10 Basements and subterranean design	Same policy direction as before – minor changes for clarity.
Policy D5. 11“Tall Buildings”	New policy
<b>Strategic Policy In6.1 Infrastructure</b>	<p>Strategic policy (f) (and justification text) added on sport and recreation to align with the Sport and Recreation policy moving to the infrastructure chapter – this was moved from the Green and Blue Infrastructure chapter.</p> <p>Some minor wording amendments made to the justification text following responses from infrastructure providers.</p>
Policy In6.2 Social and community infrastructure	<p>Minor addition to policy (b) in response to HUDU (Healthy Urban Development Unit) request - to conform with London Plan policy.</p> <p>Some justification text added following response from HUDU.</p>

	Some justification text added on Covid.
Policy O8.5 Sport and Recreation (formerly O8.5)	<p>This policy has been moved from the Green and Blue Infrastructure chapter to the Infrastructure Chapter.</p> <p>There are no substantial changes made to the policy following Stage 2a consultation.</p> <p>Minor additional wording added to the justification text at the request of MCIL to strengthen recognition of the importance of disability access.</p>
<b>Strategic policy W.6.3 Waste management</b>	Same policy direction as before – minor changes for clarity.
<b>Strategic Policy T6.4 Improving travel choices.</b>	Similar policy direction but redrafted substantially and renamed Sustainable travel choices.
Policy T6.5 Prioritising Walking.	Policy T6.5 and T6.6 have been combined into one policy that focuses on active travel choices. Policy has been redrafted significantly and policy added in relation to bike boxes on residential frontages. Policy has been renamed “Prioritising active travel choices”.
Policy T6.6 Prioritising cycling	Policy T6.5 and T6.6 have been combined into one policy that focuses on active travel choices. Policy has been redrafted significantly and policy added in relation to bike boxes on residential frontages. Policy has been renamed “Prioritising active travel choices”.
Policy T6.7 Managing transport impacts.	Similar policy direction but redrafted substantially and now incorporates policy aspects in relation to deliveries and servicing.
Policy T6.8 Parking, deliveries, and servicing	Changes made to ensure greater conformity with the London Plan in relation to parking standards. Otherwise, similar policy direction but redrafted substantially. Policies on delivery and servicing moved to T6.7. Renamed to parking and low emissions vehicles.
Policy T6.9 Supporting Transport Infrastructure	Similar policy direction but redrafted.
<b>Policy Ec7.1 Economic Development- Promoting economic growth and successful high streets</b>	Redrafted strategic policy – some quite substantial changes from Stage 2a.

Policy Ec 7.2 <del>Employment areas in Merton</del> Business locations in Merton	Same policy direction as before and incorporates offices.
<del>Policy Ec 7.3 Offices in town centres</del>	Move into business locations in Merton policy.
Policy Ec7.4 Protection of scattered employment sites	Same direction as before
Policy Ec7.5 Local employment opportunities	Same direction as before
Policy Tc7.6 <del>Location and scale of development in Merton's town centres and neighbourhood parades</del>	Similar policy direction as before but much more focussed policy
<del>Policy Tc7.7 Protection of shopping facilities within designated shopping frontages</del>	Removed.
Policy Tc7.8 Development of town centre type uses outside town centres.	Same policy direction as before.
Policy Tc7.9 Protecting corner/ local shops.	Same policy direction as before
Food and drink / leisure and entertainment uses Policy Tc7.10	Same as before
Policy Tc7.11 Culture, arts and tourism development	Same as before
<b>Strategic Policy O8.1 Open Space, Green Infrastructure and Nature Conservation</b>	<p>Strategic policy (b) reworded to strengthen wording on walking and cycling accessibility – suggested by Louisa. Was “encourage” now “protect and seek improvements to”.</p> <p>Strategic policy (e) reworded for clarity on increasing “green infrastructure” and not just “trees”.</p> <p>Strategic policy (i) on sport and recreation is deleted – has been moved to the infrastructure chapter.</p> <p>Some additions to the justification text to make clear references to the London Plan.</p> <p>Additional justification text from Louisa on pedestrian and cycle routes through green spaces.</p>
Policy O8.2 Open Space and Green Infrastructure	Policy (d) amended to strengthen wording. Did “support” now “require” for publicly accessible open space for major developments in areas of deficiency. Policy was reviewed following

	<p>comments made in Stage 2a.</p> <p>Policy (f) amended to align with the terminology used in H&amp;W chapter wording on food growing.</p> <p>Policy (g) amended for clarity.</p> <p>Justification text added on COVID.</p> <p>Minor changes to justification text for clarity following responses made on:</p> <ul style="list-style-type: none"> <li>- Historic role open spaces can play.</li> <li>- Public access routes being accessible to all.</li> <li>- No need to allotment expansion (confirmation from Greenspaces team)</li> </ul>
<p>Policy O8.3 Biodiversity and access to nature conservation.</p>	<p>Policy (c) amended to align with NPPF and be positively worded.</p> <p>Policies (d) and (f) amended for clarity.</p> <p>Additional justification text on protected species – for clarity.</p> <p>Additional justification text on biodiversity net gain.</p> <p>Minor wording correction made to geodiversity.</p>
<p>Policy O8.4 Protection of Trees</p>	<p>Policy (b) amended to strengthen wording.</p> <p>Policy (c) amended to add wording on tree canopy.</p> <p>Policy (g) amended to strength wording “was ensure” now “require”.</p> <p>Justification text added on the following (from Stage 2a responses received):</p> <ul style="list-style-type: none"> <li>- Mature trees</li> </ul>

	<ul style="list-style-type: none"> <li>- Amenity value of trees</li> <li>- Ancient woodland and veteran trees</li> <li>- Valuation systems (in line with London Plan wording)</li> <li>- Consideration of design schemes that do not involve tree removal.</li> <li>- Use of planning conditions &amp; s106.</li> <li>- Species selection</li> </ul>
Policy O8.5 Sport and Recreation	This policy has now moved to the infrastructure chapter.
Policy O8.6 Urban Greening	<p>There are no substantial changes to the policy following Stage 2a consultation.</p> <p>Minor additional wording at the request of the Woodlands Trust to add the wording “hedgerows” to justification text.</p> <p>Additional paragraph added to the justification text to link the policy with the climate change policies – namely mitigating overheating and adverse impacts on the urban heat island effect.</p>
Policy 0.87 Wandle Valley Regional Park (formerly N3)	<p>New name of policy – added “Regional Park” as this is the focus of the policy.</p> <p>Following consultation responses, a new policy has been included. This was previously justification text, but it is agreed that it is better suited as a policy requirement to strengthen the requirements for urban greening:</p> <p>h. Expect all new development within 400m of the park to provide green infrastructure elements on site through urban greening.</p> <p>Some other minor changes made to the policy and justification text.</p>
<b>Strategic Policy F8.6 Managing flood risk from all sources of flooding.</b>	
Policy F8.7 How to manage flood risk.	Some minor changes – following evidence of the Strategic Flood Risk Assessment 2020.
Policy F8.8 Sustainable drainage systems	As above.

(SUDS)	
Policy P.8.9 Improving air quality and minimising pollution -Air Quality/ Noise and vibration/ Light pollution/ Odours and fume control/ Land contamination/ Managing pollution from construction and demolition.	Some minor changes to provide clarity and text in the justification to linking the policy to the transport policies on managing the impacts HGV's and air quality.
<b>Strategic Policy CC8.10 Promoting sustainable design to mitigate and adapt to climate change.</b>	No significant changes to this policy.  Added clarification in the justification regarding the definition of net-zero carbon. Also set out where climate adaptation is addressed in the Local Plan now that policy CC8.16 has been deleted.
Policy CC8.11 Minimising greenhouse gas emissions).	No significant changes to this policy.  Amended policy wording to emphasize that all development should be aiming for net-zero carbon on site but that refurbishments will not be required to offset any carbon shortfall, to support the retrofit of existing buildings and minimise embodied carbon emissions. Reordering of and amendments to the justification considering the above and to clarify the difference between the Mayor's zero carbon target and true net-zero carbon considering consultation feedback.
Policy CC8.12 Minimising energy use	No significant changes to the policy.  Wording changes in the policy and justification to put more emphasis on unregulated emissions and Energy Use Intensity targets, and to clarify the reporting requirements for major and minor schemes considering consultation feedback.
Policy CC8.13 Low carbon energy	No major changes to this policy.  Clarified policy wording re banning gas boilers in new dwellings and new non-domestic considering feedback.  Removed policy wording re heat networks to have a more balanced policy which doesn't prioritise heat networks over individual heating systems, considering feedback regarding heat losses.

	<p>Clarified in the justification that Passivhaus certification will be required for schemes proposing to use direct electric heating to minimise operational running costs and mitigate the risk of fuel poverty considering feedback.</p> <p>Included clarification in the justification re checking renewable energy generation against the anticipated Energy Use Intensity considering feedback from Etude.</p>
Policy CC8.14 Minimising waste and promoting a circular economy.	Policy and justification have been updated: The Whole-life cycle carbon assessment will only be required for referable schemes and schemes proposing to demolish and rebuild a single dwelling (instead of all major schemes and all demolish and rebuild schemes) considering feedback from industry.
Policy CC8.15 Sustainable design standards	<p>Changed threshold for BREEAM requirements considering feedback. BREEAM certification will only be required for domestic refurbishments of 10 or more units (instead of 1 unit and above), and non-domestic new build and refurbishments of 1000sqm and above (instead of 500sqm and above), so as not to be overly burdensome for smaller schemes.</p> <p>Justification for water efficiency targets has been updated considering feedback from Thames Water.</p>
Policy CC8.16 Adapting to a changing climate.	This policy has been deleted to avoid repetition across the Local Plan. The climate adaptation requirements have been embedded in the relevant other policies for example: Design, Green and Blue Infrastructure and Sustainable Design.