



**Merton's Local Plan 2020**  
**Sustainability Appraisal incorporating Strategic Environmental**  
**Assessment (SEA)**  
**November 2018**

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## Non-technical summary

- I. This is the Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA) for Merton's new Local Plan, Environment Report. The timetable for the Local Plan towards the adoption can be found in figure 3. This report is Stage B and C of the SEA/SA process (see figure 1 and 2).
- 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 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 commence SEA at the early stages of plan making to identify the key sustainability issues likely affected by the implementation of the plan; it assists with creating development options and assesses any significant effects of the proposed development. SA/SEA's are an important 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 process**

- IV. The SEA process is an iterative process informing each consultation stage of the Local Plan's development. The ultimate 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.

### **Stage A: The Scoping Report**

- V. The purpose of this stage is to compile the background information needed for the SEA and at what level of detail. Information will be collected on environmental and social conditions in Merton and how these are likely to change and how transport can help to achieve the targets and strategies of other plans and programme. The SEA scoping process provides a selection of SEA objectives, which will be used as criteria to assess the Plan against.

### **Stage B: Developing and refining alternatives and assessing effects**

- VI. SEA governing regulations require that each responsible authority (in this case the council) confirms the scope of the Environmental Report and what alternatives and types of effect to assess. In conducting a SEA, responsible authorities must appraise the likely significant environmental effects of implementing the Local Plan and any reasonable alternatives (options). The results of the assessment of alternatives will help in the selection of the preferred '*options*' for the plan /strategy and could also help in determining the priorities for delivery of these options.

### **Stage C: Preparing the Environmental Report and consultation**

- VII. The main output of the SEA process is the Environmental Report which will be available for public consultation along with the draft Plan. The report presents information on the effects of the draft Plan.

#### **Stage D: Production of the SEA Statement**

- VIII. Following adoption of the Plan and in order to meet the requirement of the SEA Directive; the council is required to produce an SEA Statement. This Statement will state how the findings from the SEA and consultation results have been taken into account. This SEA Statement should be made available to stakeholders.

#### **Stage E: Monitoring of SEA**

- IX. The SEA Directive specifically requires monitoring of the significant environmental effects of the Plan. The council will be producing a monitoring system to monitor '*significant effects*'.

#### **SEA objectives**

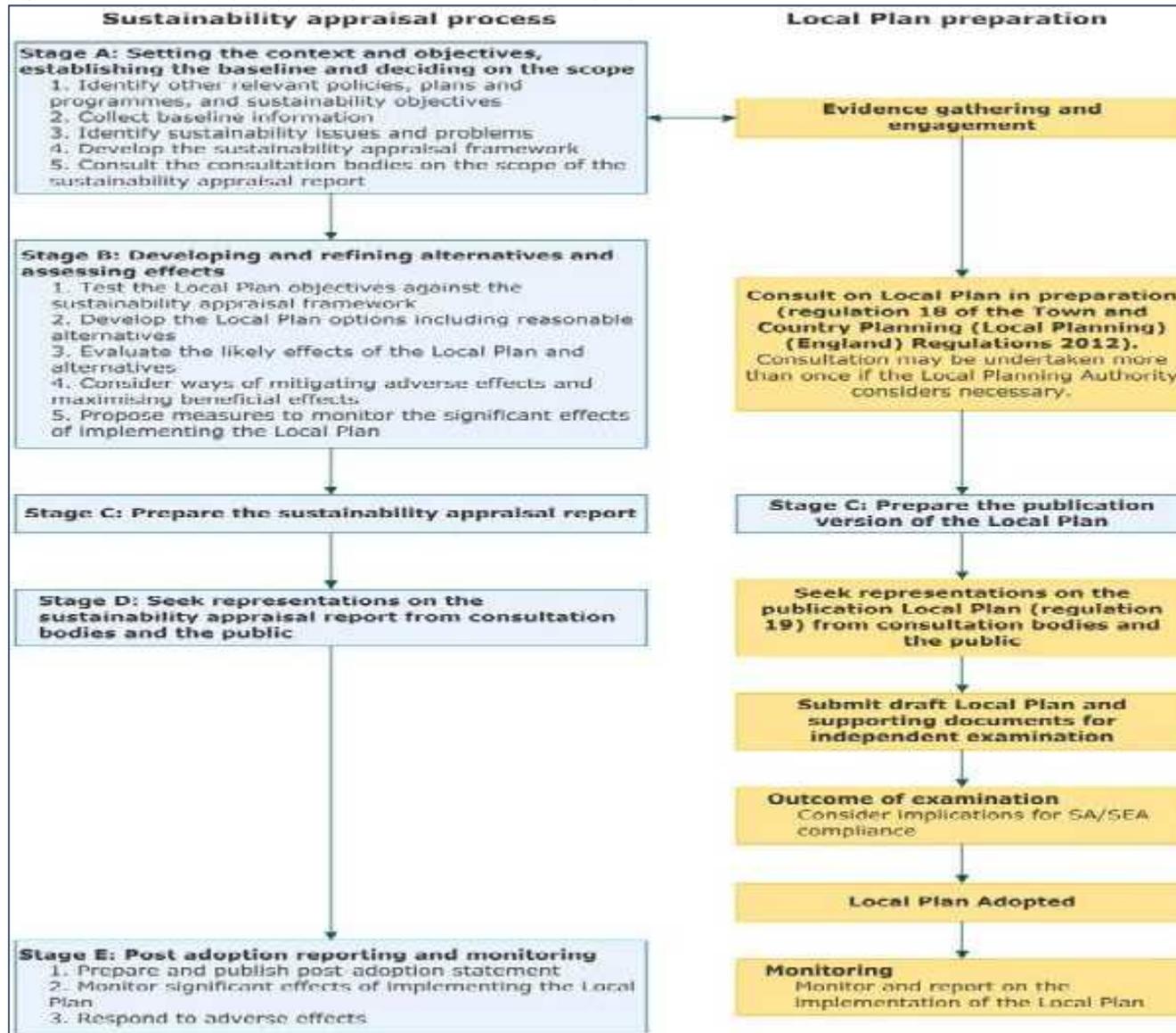
- X. The ultimate aim of the SEA is to decide which impacts are likely to be significant and what the assessment should concentrate on. This is achieved through the selection of SEA objectives and indicators; which will be used to measure the impact of the plan/strategy.

Figure 1: Stages in the SEA process

SEA stages and tasks	Purpose
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>	
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 subsequent 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 programme.
<b>Stage B: Developing and refining alternatives and assessing effects</b>	
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 taken into account.
Making decisions and providing information	To provide information on how the Environmental Report and consultees' opinions were taken into account 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



## What is the new Local Plan?

- XI. Merton has many assets, including superb transport links, beautiful open green spaces, heritage buildings, and a lively business sector.
- XII. We are creating a new Local Plan to 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.
- XIII. The 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 3: Local Plan timetable

Stages	Dates
Call for sites	
<sup>1</sup> Draft Local Plan (stage 2)	October 2018
Draft Local Plan (stage 3)	Spring /summer 2019
Public enquiry	Winter 2019
Adoption	Winter 2020

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<sup>1</sup> Another round of consultation is likely due to the Mayor's new housing target for London borough and the EiP of the new London Plan.

## Technical report

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

1.1 The EU Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK by the SEA Regulations 2004, requires environmental assessment to be undertaken on all plans and programmes where they are likely to have significant environmental impacts.

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—

- n) biodiversity;
- o) population;
- p) human health;
- q) fauna;
- r) flora;
- s) soil;
- t) water;
- u) air;
- v) climatic factors;
- w) material assets;
- x) cultural heritage, including architectural and archaeological heritage;
- y) landscape; and
- z) 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 commence SEA at the early stages of plan making to identify the key sustainability issues likely affected by the implementation of the plan; it assists with creating development options and assesses any significant effects of the proposed development. SA/SEA's are an important 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 plan has addressed the sustainability agenda and the choices made between alternative policies and proposals. The Inspector, when determining 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

## 2 Other assessments

### **Habitat Regulation Assessments**

2.1 The EU directive on the Conservation of Natural Habitats and Wild Fauna and Flora<sup>2</sup>, also referred to as the 'Habitats Directive', provides legal protection for habitats of exceptional European importance. Article two of the directive requires the restoration and maintenance of habitats and species to a favourable conservation status and subsequent articles set up the

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<sup>2</sup> [http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm)

means to designate protection areas. These are either set up as Special Areas of Conservation (SAC) or Special Protection Areas (SPA) depending on the protection aim.

- 2.2 In order that these designated areas are protected the Habitats Directive has set the requirement for plans and projects to be assessed for their likely impact on them; in order to ensure that they do not have a negative impact. The assessment is to ensure that any significant effects are identified and avoided.
- 2.3 The Conservation (Natural Habitats &c) Regulations 1994 have been amended to implement a judgement of the European Court of Justice. The amended Regulations came into force in 2007. The effect of the Regulations (as amended) is to add Part IVA (Regulations 85A -85E) under the title "*Appropriate Assessments for Land Use Plans in England and Wales*".
- 2.4 The essential requirement of this amendment is for the Local Planning Authority (LPA) in this case Merton Council; to assess the potential effects of land use plans, to ensure that the protection and integrity of European Sites is considered by the planning process at a local level. The process by which this is achieved is by way of a Habitats Regulations Assessment (HRA). The HRA assess the impacts of a land-use Plan against the conservation objectives of sites and to ascertain whether it would adversely affect the integrity of that site.
- 2.5 The European Sites network (also known as Natura 2000) provides for the protection of sites that are of exceptional importance for rare, endangered or vulnerable natural habitats and species within the European Community. These sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS). Ramsar sites (wetlands of international importance) are included as if they are fully designated European Sites for the purpose of considering development proposals that may affect them.

### **Health Impact Assessments**

- 2.6 The purpose of HIA 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 Assessment (EqIA)

- 2.7 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
- 2.8 At the decision making stage local authorities are required to assess how changes to polices and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics' - which includes the following:
- |                  |                                  |
|------------------|----------------------------------|
| ) Age            | ) Sexual Orientation             |
| ) Disability     | ) Gender Reassignment            |
| ) Sex/Gender     | ) Marriage and Civil Partnership |
| ) Race or belief | ) Pregnancy and Maternity        |
| ) Religion       |                                  |
- 2.9 The purpose of the EqIA 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.
- ### 3 Appraisal methodology
- 3.1 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 4: 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

## 4 Developing strategic alternatives

- 4.1 The options below are the strategic alternatives were considered. They have been developed in response to the key issues and are considered the most appropriate way of dealing with these. Using the SA Objectives, the options will be appraised and this will be used to inform the choice of options to take forward and refine further. It is not the purpose of the SA to decide which option should be taken forward, only to provide information on the sustainability effects of these options for the plan-makers and to provide transparency.

Figure 5: Alternatives



4.2 Figure 6 below summarises the overall performance of each strategic option when tested against the SA Objectives. It is could be argued whether Option 4 is in fact a reasonable option, given that Merton Council is statutory required to produce a Local Plan in order to comply with the NPPF; however this option has been appraised along with the others three.

Figure 6: Measuring the options against the sustainable objectives

Sustainable objectives	Option 1: Focus on regeneration <i>Continue to develop and grow within town centres.</i>	Option 2: Focus on public transport <i>Develop and grow within areas with good public transport links</i>	Option 3: Focus on renewal <i>Develop and grow in areas of deprivation</i>	Option 4: Allow the market to lead <i>No Local Plan</i>
Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Grey	Light Green	Grey	Red
Biodiversity 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).	Grey	Light Green	Light Green	Red
Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.	Light Green	Light Green	Light Green	Grey
Sustainable land use To make the best and most efficient use of land so as to support sustainable patterns and forms of development.	Light Green	Light Green	Light Green	Red
Heritage (including architectural and archaeological heritage) 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.	Light Green	Light Green	Light Green	Red
Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Light Green	Light Green	Light Green	Red
Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Light Green	Dark Green	Light Green	Red
Noise and vibration	Light Green	Light Green	Light Green	Red

To minimise noise, vibration levels and disruption to people and communities.				
Water quality To protect and enhance Merton's water bodies.				
Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.				
Open space and nature 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				
Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.				
Energy use To improve energy efficiency in new developments Increase renewable energy supply / provision				
Health and well being To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.				
Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.				
Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.				
Population demand and growth 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				

Social inclusion and cohesion To ensure Merton has socially integrated communities which are strong, resilient and inclusive.				
Design 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.				
Local employment To develop and maintain a healthy labour market				
Education and skills 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.				
Economic growth To increase the vitality and viability of existing town centres, local centres and parades  To ensure that there is a mixed of business spaces including, affordable spaces in Merton.				

- 4.3 We can see that the likely effects of options 1 and 2 are broadly very similar as both would involve focusing development mainly in town centres and although under option 2 development, would also be focused along the areas of good transport links, this would have similar effects to development in terms of being well connected to jobs and services.
- 4.4 Both options 1 and 2 will have largely positive effects on the social and economic objectives as development would be focused near to, or accessible from, the main areas where existing jobs, services and facilities are generally located. Under option 3 we can see that there are largely positive effects on the social objectives in areas of housing and potential job creation and opportunities. Under option 4, which would involve having no new Local Plan, the likely effects are negative in relation to all of the SA objectives. This is because, without the strategic development sites allocated in the Local Plan, the quantum and spread of new development in the borough would not be planned, managed and could lead to development proposals coming forward in less sustainable locations e.g. area with poor transport infrastructure

or poor accessibility to essential services or the wrong type of housing to meet local needs such as affordable housing; in addition quality and design of development could not be guaranteed especially in area of with historic assets. No Local Plan would also mean there would be light to no, protection of local open spaces, biodiversity, and landscape and heritage assets in Merton. No opportunity to mitigate against or adapt to climate change by way housing development, flood risk management energy use and air quality for example.

## 5 Testing the Strategic Objectives of the Local Plan

- 5.1 An analysis of the Local Plan objectives has been undertaken by testing them against the SA objectives. The purpose of the test is to see how compatible the objectives are. Where incompatibility or uncertainty has been identified, recommendations have been made to strengthen the Local Plan objectives. Where uncertainty has been identified this does not preclude the policies from having compatible elements as well, as the SA objectives have sub-objectives against which the Local Plan objectives are tested.

Figure 7: Local Plan Strategic Objectives measured against the SA Objectives

Sustainability Objectives	Healthy places	Place	Housing	Environment	Infrastructure	Economy
Air quality						
Biodiversity						
Land and soil condition and pollutants						
Sustainable land use						
Heritage (including architectural and archaeological heritage)						
Flood risk management						
Climate change						
Noise and vibration						

Water quality						
Water consumption						
Open space and nature						
Sustainable transport						
Energy use						
Health and well being						
Housing						
Safe environments						
Population demands and growth						
Social inclusion and cohesion						
Design						
Local employment						
Education and skills						
Economic growth and town centres						

## 6 Evaluating the effects of the plan

- 6.1 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
- 6.2 It is important to note that a site allocations comprises 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.

Figure 8: SA framework and decision making criteria for site allocations

SA objective	Decision making criteria
Air quality	Will it maintain and improve local air quality?
Biodiversity	Will it protect and enhance habitats and species, provide opportunities for new habitat creation and reverse the fragmentation of wildlife corridors?
Land and soil condition and pollutants	Will it conserve Merton's geodiversity and protect soils from development and over intensive use.
Sustainable land use	Will it protect and enhance the accessibility of the landscape across the borough? Will it reduce the amount of derelict, contaminated, degraded, unstable and vacant/underused land?
Heritage (including architectural and archaeological heritage)	Will it support the conservation and/or enhancement of high quality built, natural and historic environments within the borough? Will it protect and enhance the character and appearance of archaeological sites, historic buildings, townscape, landscape, parks and gardens and their settings? Will it increase the economic benefit derived from the borough's natural environment?
Flood risk management	Will it reduce or manage flood risk?
Climate change	Will it reduce or minimise greenhouse gas emissions Will it contribute to the borough's ability to adapt to the impacts of climate change, including the ability of other species to adapt?
Noise and vibration	Will it reduce noise pollution?
Water quality	Will it improve water quality?
Water consumption	Will it reduce water consumption?
Open space and nature	Will it increase the economic and social benefits derived from the borough's natural environment? Will it provide opportunities for physical activity?
Sustainable transport	Will it improve physical accessibility to jobs with the location of sites and/or public transport links being close to areas of high unemployment? Will it promote healthier lifestyles? Will it reduce car and lorry traffic?

	Will it reduce isolation for vulnerable people?
Energy use	Will it contribute to low carbon economy? Will it maximise the production and/or use of decentralised and renewable energy? Will it support the development of resource efficient housing?
Health and well being	Will it improve the health and wellbeing of residents especially those living in deprived areas?
Housing	Will it provide for an appropriate mix of housing to meet all needs, including affordable?
Safe environments	Will it reduce actual levels of crime? Will it reduce the fear of crime?
Population demands and growth	Will it improve access to essential services and facilities? Will it create a sense of belonging and wellbeing for all members of the community?
Social inclusion and cohesion	Will it support community development? Will it improve relations between all members of the community? Will it reduce social exclusion? Will it reduce prejudice? Will it reduce poverty in those areas most affected? Will it promote mixed communities?
Design	Will it encourage crime reduction through design?
Local employment	Will it increase, and improve the quality of, employment opportunities in the areas of most need? Will it provide a broad range of jobs and employment opportunities?
Education and skills	Will it improve physical access to employment opportunities? Will it address the skills gap and enable skills progression? Will it increase levels of participation and attainment in education?
Economic growth and town centres	Will it promote growth in key sectors of the local economy? Will it attract new business development to the borough? Will it promote the area as a destination for short and long term visitors, for residents and investors? Will it help to diversify the borough's economy? Will it improve economic, social and environmental conditions in the most deprived areas and for the most deprived groups? Will it enhance the viability and vitality of the town centres? Will it support and encourage the growth of rural businesses and rural diversification?







Sustainable land use.									
Heritage (including architectural and archaeological heritage),									
Flood risk management									
Climate change									
Noise and vibration									
Water quality									
Water consumption									
Open space and nature									
Sustainable transport									
Energy use									
Health and well being									
Housing									
Safe environments									
Population demands and growth									
Social inclusion and cohesion									
Design									
Local employment									
Education and skills									
Economic growth									

Figure 12: Mixed used (T - Y).

Sustainability Objectives	Taylor Road Day Centre, Mitcham	Wimbledon Community Centre, Wimbledon	West Barnes Library, West Barnes	White Hart Public House and backland	Wilson Hospital, Mitcham	Wimbledon Stadium and Volante site	YMCA Wimbledon, Wimbledon
Air quality							
Biodiversity							
Land and soil condition and pollutants							
Sustainable land use							
Heritage (including architectural and archaeological heritage)							
Flood risk management							
Climate change							
Noise and vibration							
Water quality							
Water consumption							
Open space and nature							
Sustainable transport							
Energy use							
Health and well being							
Housing							
Safe environments							
Population demands and growth							
Social inclusion and cohesion							
Design							
Local employment							
Education and skills							
Economic growth							

## Employment sites

6.5 The likely effects of employment sites on each of the SA objectives are shown in the figure x.

Figure 13: Employment sites

Sustainability Objectives	245-247 Burlington Road, New Malden	Priory Retail Park, Colliers Wood
Air quality		
Biodiversity		
Land and soil condition and pollutants		
Sustainable land use		
Heritage (including architectural and archaeological heritage)		
Flood risk management		
Climate change		
Noise and vibration		
Water quality		
Water consumption		
Open space and nature		
Sustainable transport		
Energy use		
Health and well being		
Housing		
Safe environments		
Population demands and growth		
Social inclusion and cohesion		
Design		
Local employment		
Education and skills		
Economic growth		

## Employment led mixed use sites

6.6 The likely effects of employment sites on each of the SA objectives are shown in the figure 14.

Figure 14: Employment led mixed use

Sustainability Objectives	245-247 Burlington Road, New Malden	Priory Retail Park, Colliers Wood	*Rufus Business Park Centre, Wimbledon Park
Air quality			
Biodiversity			
Land and soil condition and pollutants			
Sustainable land use			
Heritage (including architectural and archaeological heritage)			
Flood risk management			
Climate change			
Noise and vibration			
Water quality			
Water consumption			
Open space and nature			
Sustainable transport			
Energy use			
Health and well being			
Housing			
Safe environments			
Population demands and growth			
Social inclusion and cohesion			
Design			
Local employment			
Education and skills			
Economic growth			

**Mixed use with no residential and/or other solely use sites**

6.7 The likely effects of employment sites on each of the SA objectives are shown in the figures 15-16.

Figure 15: Mixed use with no residential and/or other solely use such as sport facilities and community uses site options (A - H)

Sustainability Objectives	Amity Grove Clinic	Broadway Car Park, Wimbledon	All England Lawn Tennis Club, Wimbledon	All England Lawn Tennis Club Community Sports Ground, Raynes Park	27- 39 Hartfield Road, Wimbledon	Hartfield Road Car Park, Wimbledon
Air quality						
Biodiversity						
Land and soil condition and pollutants						
Sustainable land use						
Heritage (including architectural and archaeological heritage)						
Flood risk management						
Climate change						
Noise and vibration						
Water quality						
Water consumption						
Open space and nature						
Sustainable transport						
Energy use						
Health and well being						
Housing						
Safe environments						
Population demands and growth						
Social inclusion and cohesion						

Design						
Local employment						
Education and skills						
Economic growth						

Figure 16: Mixed use with no residential and/or other solely use such as sport facilities and community uses site options (L - W).

Sustainability Objectives	Land at the former LESSA Sports Ground , Raynes Park	Imperial Sports Ground, Mitcham	United Westminster Schools Site, Mitcham	Victoria Crescent, Wimbledon	Worsfold House, Mitcham
Air quality					
Biodiversity					
Land and soil condition and pollutants					
Sustainable land use					
Heritage (including architectural and archaeological heritage)					
Flood risk management					
Climate change					
Noise and vibration					
Water quality					
Water consumption					
Open space and nature					
Sustainable transport					
Energy use					
Health and well being					
Housing					
Safe environments					
Population demands and growth					
Social inclusion and cohesion					
Design					
Local employment					
Education and skills					
Economic growth					

## Morden town centre regeneration area site

Figure 17: Morden town centre regeneration area (mixed use incorporating residential or solely residential)

Sustainability Objectives	Morden Depot, Morden	Morden Town Centre (formerly known as the Housing Zone)	York Close Car Park, Morden
Air quality			
Biodiversity			
Land and soil condition and pollutants			
Sustainable land use			
Heritage (including architectural and archaeological heritage)			
Flood risk management			
Climate change			
Noise and vibration			
Water quality			
Water consumption			
Open space and nature			
Sustainable transport			
Energy use			
Health and well being			
Housing			
Safe environments			
Population demands and growth			
Social inclusion and cohesion			
Design			
Local employment			
Education and skills			
Economic growth			

## Strategic and development management policies assessment against the Sustainability Objectives

- 6.8 The draft Local Plan will contain a number of policies, which will be used in the determining any submitted the planning applications in Merton. An assessment of the Plan policies has been carried out against the revised SA framework. The draft Local Plan has strategic policies in accordance with the NPPF. The draft Local Plan makes it explicit which policies are strategic policies in line with the NPPF.
- 6.9 It goes on further to say 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.

Figure 18: Strategic policies against the SA objectives (part i)

Sustainability Objectives	Health and wellbeing	Housing choice	Housing provision	Placemaking and design	Social and community infrastructure	Waste management
Air quality						
Biodiversity						
Land and soil condition and pollutants.						
Sustainable land use						
Heritage (including architectural and archaeological heritage)						
Flood risk management						
Climate change						
Noise and vibration						
Water quality						
Water consumption						

Open space and nature						
Sustainable transport						
Energy use						
Health and well being						
Housing						
Safe environments						
Population demands and growth						
Social inclusion and cohesion						
Design						
Local employment						
Education and skills						
Economic growth						

Figure 19: Strategic policies against the SA objectives (part ii)

Sustainability Objectives	Supporting an inclusive and better connected transport network	Open Space, Green Infrastructure and Nature Conservation	Managing flood risk from all sources of flooding	Supporting a more sustainable and resilient environment	Economic Development
Air quality					
Biodiversity					
Land and soil condition and pollutants.					
Sustainable land use					
Heritage (including architectural and archaeological heritage)					
Flood risk management					
Climate change					
Noise and vibration					
Water quality					



Flood risk management								
Climate change								
Noise and vibration								
Water quality								
Water consumption								
Open space and nature								
Sustainable transport								
Energy use								
Health and well being								
Housing								
Safe environments								
Population demands and growth								
Social inclusion and cohesion								
Design								
Local employment								
Education and skills								
Economic growth								

Figure 21: Housing development management policies against the SA objectives

Sustainability Objectives	Housing mix	Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system	Student housing, other housing with shared facilities and bedsits	Accommodation for Gypsies and Travellers	Build to Rent
Air quality					
Biodiversity					
Land and soil condition and pollutants					
Sustainable land use					
Heritage (including architectural					



Climate change								
Noise and vibration								
Water quality								
Water consumption								
Open space and nature								
Sustainable transport								
Energy use								
Health and well being								
Housing								
Safe environments								
Population demands and growth								
Social inclusion and cohesion								
Design								
Local employment								
Education and skills								
Economic growth								

Figure 23: Infrastructure development management policies against the SA objectives

Sustainability Objectives	Delivering social and community infrastructure	Sustainable and active travel	Transport impact of development	Car parking and servicing	Transport infrastructure
Air quality					
Biodiversity					
Land and soil condition and pollutants					
Sustainable land use					
Heritage (including architectural and archaeological heritage)					
Flood risk management					
Climate change					

Noise and vibration					
Water quality					
Water consumption					
Open space and nature					
Sustainable transport					
Energy use					
Health and well being					
Housing					
Safe environments					
Population demands and growth					
Social inclusion and cohesion					
Design					
Local employment					
Education and skills					
Economic growth					

Figure 24: Economy development management policies against the SA objectives

Sustainability Objectives	Employment areas in Merton	Offices in town centres	Protection of scattered employment sites	Local employment opportunities
Air quality				
Biodiversity				
Land and soil condition and pollutants				
Sustainable land use				
Heritage (including architectural and archaeological heritage)				
Flood risk management				
Climate change				
Noise and vibration				

Water quality				
Water consumption				
Open space and nature				
Sustainable transport				
Energy use				
Health and well being				
Housing				
Safe environments				
Population demands and growth				
Social inclusion and cohesion				
Design				
Local employment				
Education and skills				
Economic growth				

Figure 25: Town centre development management policies against the SA objectives

Sustainability Objectives	Location and scale of development in Merton's town centres and neighbourhood parades	Protection of shopping facilities within designated shopping frontages	Development of town centre type uses outside town centres	Protecting corner/ local shops	Food and drink / leisure and entertainment uses	Culture, arts and tourism development
Air quality						
Biodiversity						
Land and soil condition and pollutants						
Sustainable land use						
Heritage (including architectural and archaeological heritage)						
Flood risk management						
Climate change						
Noise and vibration						

Water quality						
Water consumption						
Open space and nature						
Sustainable transport						
Energy use						
Health and well being						
Housing						
Safe environments						
Population demands and growth						
Social inclusion and cohesion						
Design						
Local employment						
Education and skills						
Economic growth						

Figure 26: Environment development management policies against the SA objectives (1/2)

Sustainability Objectives	Open Space and Green Infrastructure	Biodiversity and nature conservation	Protection of Trees	Leisure, Sport and Recreation	How to manage flood risk	Sustainable drainage systems (SuDS)	Improving air quality and minimising pollution
Air quality							
Biodiversity							
Land and soil condition and pollutants							
Sustainable land use							
Heritage (including architectural and archaeological heritage)							
Flood risk management							
Climate change							
Noise and vibration							
Water quality							

Water consumption							
Open space and nature							
Sustainable transport							
Energy use							
Health and well being							
Housing							
Safe environments							
Population demands and growth							
Social inclusion and cohesion							
Design							
Local employment							
Education and skills							
Economic growth							

Figure 27: Environment development management policies against the SA objectives (2/2)

Sustainability Objectives	Reducing energy use and carbon emissions	Sustainable design and construction	Maximising local energy generation	Adaptable development for a changing climate	Circular economic principles
Air quality					
Biodiversity					
Land and soil condition and pollutants					
Sustainable land use					
Heritage (including architectural and archaeological heritage)					
Flood risk management					
Climate change.					
Noise and vibration					
Water quality					
Water consumption					
Open space and nature					
Sustainable transport					

Energy use					
Health and well being					
Housing					
Safe environments					
Population demands and growth					
Social inclusion and cohesion					
Design					
Local employment					
Education and skills					
Economic growth					

Figure 28: Policies Map designations against the SA objectives

Designation and name	Beverley Brook/A3 - MOL 4	Civil Service Sports Ground – Open Space P020	Bishopsford Community School – Open Space S004	Blossom House School Playing Fields – Open Space S050
Proposed change	Minor MOL boundary amendment	Minor MOL boundary amendment	Minor amendment to open space boundary	Minor amendment to open space boundary
Reason	Boundary changes are required to correct an anomaly from the current Development Plan. Land is privately owned and has long been used as a private garden.	Boundary changes are required to correct an anomaly from the current Development Plan. Land is privately owned and has long been used as a private garden.	Identified in the borough-wide open space review as no longer meeting open space criteria.	Remove open space area as identified.
Strategic Objectives				
Air quality				
Biodiversity				
Land and soil condition and pollutants				
Sustainable land use				

Heritage (including architectural and archaeological heritage)	
Flood risk management	
Climate change	
Noise and vibration	
Water quality	
Water consumption	
Open space and nature	
Sustainable transport	
Energy use	
Health and well being	
Housing	
Safe environments	
Population demands and growth	
Social inclusion and cohesion	
Design	
Local employment	
Education and skills	
Economic growth	

Figure 29: Policies Map against the SA objectives

Designation and name	Cranmer Primary – Open Space S006	Cricket Green School – Open Space S014	Harris Academy – Open Space S032	Hollymount School Playing Fields – Open Space S051
Proposed change	Minor open space boundary amendment	Open space boundary amendment	Open space boundary amendment	Open space boundary amendment
Reason	Identified in the borough-wide open space review as no longer meeting open space criteria.	Refer to approved planning application 18/P0086.	Identified in the borough-wide open space review as no longer meeting open space criteria.	Identified in the borough-wide open space review as no longer meeting open space criteria.
Strategic Objectives				
Air quality				
Biodiversity				
Land and soil condition and pollutants				
Sustainable land use				
Heritage (including architectural and archaeological heritage)				
Flood risk management				
Climate change				
Noise and vibration				
Water quality				
Water consumption				
Open space and nature				
Sustainable transport				
Energy use				
Health and well being				
Housing				

Safe environments	
Population demands and growth	
Social inclusion and cohesion	
Design	
Local employment	
Education and skills	
Economic growth	

Figure 30: Policies Map against the SA objectives

Designation and name	Imperial Club Sports Ground – Open Space P028	London Electricity Sports Ground (LESSA) – Open Space P006	Manor Club Bowling Green – Open Space P016	Mary Tate Almshouses Allotments, Cricket Green
Proposed change	Open space boundary amendment	Open space boundary amendment	Open space boundary amendment	Proposed new open space designation for area
Reason	This site is identified as Mo3 in Morden Site Allocations for intensification of sporting activity supported by enabling development.	This site is identified as RP6 in Raynes Park Site Allocations. Use of the site for sporting or community use will have to be demonstrated as undeliverable before other uses can be considered	Identified in the borough-wide open space review as no longer meeting open space criteria.	Requested during Stage 1 consultation to protect allotments.
Strategic Objectives				Identified in the borough-wide open space review as meeting open space criteria.
Air quality				
Biodiversity				
Land and soil condition and pollutants				
Sustainable land use				

Heritage (including architectural and archaeological heritage)			
Flood risk management			
Climate change			
Noise and vibration			
Water quality			
Water consumption			
Open space and nature			
Sustainable transport			
Energy use			
Health and well being			
Housing			
Safe environments			
Population demands and growth			
Social inclusion and cohesion			
Design			
Local employment			
Education and skills			
Economic growth			

Figure 31: Policies Map against the SA objectives

Designation and name	Morden Cemetery – Green Corridor GC09	Morden Park and Surrounds – Green Corridor GC10  Morden Playing Fields – Open Space P025  Morden Park – MOL 16	Pelham Primary School Playing Fields – Open Space S062	Ravensbury Park – Open Space M053
Proposed change	Green corridor boundary amendment	Potential green corridor boundary amendment to be reviewed and confirmed once existing leisure centre has been demolished and landscaping plan has been implemented.	Open space boundary amendment	Open space boundary amendment
Reason	Identified in the borough-wide review as no longer meeting green corridor criteria.	Refer to approved Planning Application 16/P0882.  Demolition of existing leisure centre. Construction of new leisure centre.	Identified in the borough-wide open space review as no longer meeting open space criteria	The Merton Estates Local Plan 2018 policy EPR5 identifies this land as communal garden space with existing access to Ravensbury Park.  Identified in the borough-wide open space review as no longer meeting open space criteria.
Strategic Objectives				
Air quality				
Biodiversity				
Land and soil condition and pollutants				
Sustainable land use				
Heritage (including architectural and archaeological heritage)				
Flood risk management				
Climate change				
Noise and vibration				

Water quality			
Water consumption			
Open space and nature			
Sustainable transport			
Energy use			
Health and well being			
Housing			
Safe environments			
Population demands and growth			
Social inclusion and cohesion			
Design			
Local employment			
Education and skills			
Economic growth			

Figure 32: Policies Map against the SA objectives

Designation and name	Raynes Park High School – Open Space S008	Raynes Park Playing Fields – Open Space P002	Stanford Primary School – Open Space S020	St Mary’s RC Primary School Playing Fields
Proposed change	Open space boundary amendment	Open space boundary amendment	Open space boundary amendment	Open space boundary amendment
Reason	To fix a previous mapping error.	Identified in the borough-wide open space review as no longer meeting open space criteria.	Identified in the borough-wide open space review as no longer meeting open space criteria.	Identified in the borough-wide open space review as no longer meeting open space criteria.
Strategic Objectives				
Air quality				
Biodiversity				
Land and soil condition and pollutants				
Sustainable land use				
Heritage (including architectural and archaeological heritage)				
Flood risk management				
Climate change				
Noise and vibration				
Water quality				
Water consumption				
Open space and nature				
Sustainable transport				
Energy use				
Health and well being				
Housing				
Safe environments				
Population demands and growth				
Social inclusion and cohesion				

Design		
Local employment		
Education and skills		
Economic growth		

Figure 33: Policies Map against the SA objectives

Designation and name	Streatham Junction to Wimbledon Rail sides – SINC MeBII01A  Ridge Road to Wimbledon Park – Green Corridor GC19	Sutton line south of Wimbledon – SINC MeBII01F	St Ann’s Secondary School Playing Fields – Open Space S055	Tamworth Farm Allotments – Open Space A014
Proposed change	SINC boundary amendment.  Green corridor boundary amendment	SINC boundary amendment	Open space boundary amendment	Open space boundary amendment
Reason	Refer to approved planning application 10/P2827	To fix minor mapping error	Identified in the borough-wide open space review as no longer meeting open space criteria.	Identified in the borough-wide open space review as no longer meeting open space criteria.
Strategic Objectives	Identified in the borough-wide review as no longer meeting green corridor criteria.			
Air quality				
Biodiversity				
Land and soil condition and pollutants				
Sustainable land use				
Heritage (including architectural and archaeological heritage)				
Flood risk management				
Climate change				

Noise and vibration			
Water quality			
Water consumption			
Open space and nature			
Sustainable transport			
Energy use			
Health and well being			
Housing			
Safe environments			
Population demands and growth			
Social inclusion and cohesion			
Design			
Local employment			
Education and skills			
Economic growth			

Figure 34: Policies Map against the SA objectives

Designation and name	Trenchard Court Haig Homes Open Space – Open Space M099	Ursuline Convent High School Playing Fields – Open Space S052	Wandle Valley – MOL 18	Welford Park and Path – Open Space M080
Proposed change	Open space boundary amendment	Open space boundary amendment	Minor MOL boundary amendment	Open space boundary amendment
Reason	Refer to approved planning application 16/P1696.	Identified in the borough-wide open space review as no longer meeting open space criteria.	Identified in the borough-wide open space review as no longer meeting MOL criteria	Identified in the borough-wide open space review as no longer meeting open space criteria.
Strategic Objectives				
Air quality				
Biodiversity				
Land and soil condition and pollutants				

Sustainable land use				
Heritage (including architectural and archaeological heritage)				
Flood risk management				
Climate change				
Noise and vibration				
Water quality				
Water consumption				
Open space and nature				
Sustainable transport				
Energy use				
Health and well being				
Housing				
Safe environments				
Population demands and growth				
Social inclusion and cohesion				
Design				
Local employment				
Education and skills				
Economic growth				

Figure 35: Policies Map against the SA objectives

Designation and name	Westminster City School Playing Fields– Open Space P030	Wimbledon Common – Green Corridor GC22	Wimbledon Park – MOL 2	All England Lawn Tennis Club – Open Space P035
Proposed change	Open space boundary amendment	Green corridor boundary amendment	MOL boundary amendment	Open space amendment
Reason	This site is identified as Mi14 in Mitcham Site Allocations for creation of new publically accessible sporting facilities enabled by residential development.	Identified in the borough-wide open space review as no longer meeting green corridor criteria.	Identified in the borough-wide open space review as no longer meeting MOL criteria.	Identified in the borough-wide open space review as no longer meeting open space criteria.
Strategic Objectives				
Air quality	?	0	0	0
Biodiversity	?	0	?	0
Land and soil condition and pollutants				
Sustainable land use				
Heritage (including architectural and archaeological heritage)				
Flood risk management				
Climate change				
Noise and vibration				
Water quality				
Water consumption				
Open space and nature				
Sustainable transport				
Energy use				
Health and well being				
Housing				
Safe environments				

Population demands and growth				
Social inclusion and cohesion				
Design				
Local employment				
Education and skills				
Economic growth				

Figure 36: Policies Map against the SA objectives

Designation and name	Wimbledon Common – Green Corridor GC22	Wimbledon Rail sides – Green Corridor GC24	Benedicts Wharf – Site Allocation Mi1
Proposed change	Green corridor boundary amendment	Green corridor boundary amendment	Removed site outlined in blue from Strategic Industrial Location and South London Waste Plan schedule 1
Reason	Identified in the borough-wide open space review as no longer meeting green corridor criteria.	Identified in the borough-wide open space review as no longer meeting green corridor criteria.	This site is identified as Mi11 in Mitcham Site Allocations. Removal from SIL proposed due to nearby sensitive receptors; unviability of continued heavy industry and waste management on site. Waste management capacity to be retained elsewhere in South London Waste Plan boroughs. For more details please see Site Allocation Mi1
Strategic Objectives			
Air quality			
Biodiversity			
Land and soil condition and pollutants			
Sustainable land use			
Heritage (including architectural and archaeological heritage)			
Flood risk management			
Climate change			
Noise and vibration			
Water quality			
Water consumption			

Open space and nature			
Sustainable transport			
Energy use			
Health and well being			
Housing			
Safe environments			
Population demands and growth			
Social inclusion and cohesion			
Design			
Local employment			
Education and skills			
Economic growth			

## South Wimbledon local centre designation: developing alternatives opportunities

- 6.10 The draft Local Plan proposes to designate South Wimbledon as a local centre. At present South Wimbledon is designated as part of Colliers Wood. However the council believes that South Wimbledon should be recognised in its own right.

### Option 1

#### Opportunities:

- ) All South Wimbledon current shopping parades are within the proposed Local Centre boundary
- ) Also includes all commercial development proposed in the regeneration of High Path estate (which stretches to opposite Haydon's Road to the east and to High Path to the south)
- ) Includes not only South Wimbledon station as the hub but also all major bus stops in all directions.

#### Issues:

- ) Large area, questionable footfall in some parts (e.g. just north of The Path)
- ) Quite a lot of residential frontages included (e.g. Evolve housing on Kingston Road; Morden Road opposite petrol station, existing High Path estate. Makes it more difficult to understand Local Centre's purpose.



- ) The part of High Path estate opposite Nelson Road are in the later phases of regeneration. Currently residential. Should this Local Centre include this area now or in a future boundary extension?
- ) Funding bids would be spread over a large area.

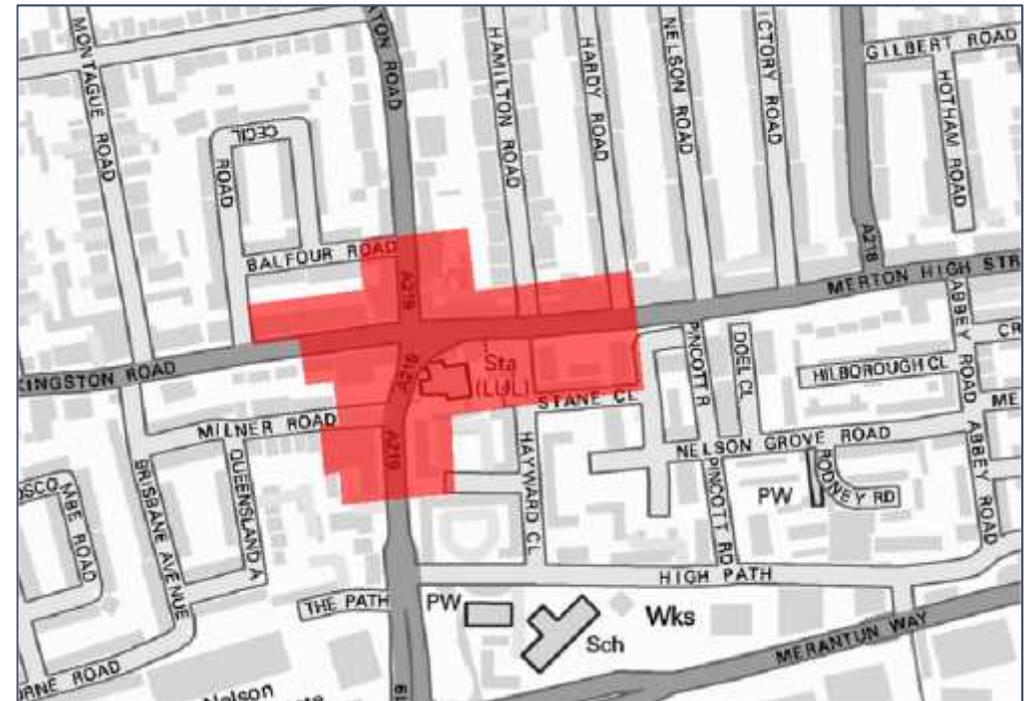
## Option 2

### Opportunities

- ) Strong focus around South Wimbledon tube
- ) Funding, if achieved, would be very focussed
- ) Excludes most residential frontages
- ) The High Path estate regeneration proposes a park which lies broadly opposite the shopping parade between Hardy Road and Nelson Road on the southern side of Merton High Street. This proposed boundary would stop at the entrance to the park, on its western edge

### Issues

- ) Leaves out a lot of shopping parades particularly along Merton Road and also Merton High Street north side
- ) Seems too small. South Wimbledon feels more extensive than this when standing at South Wimbledon junction (if that is the centre of the area)



### Option 3

#### Opportunities

- ) Retains clear focus around South Wimbledon underground
- ) Includes most existing shopping parades that can be seen from South Wimbledon junction; particularly along Merton Road
- ) At Merton High Street south side the boundary would stop at the western edge of the newly proposed park in High Path regeneration.
- ) At Kingston Road, extends to Cecil Road junction on northern side and to Evolve Housing on southern side
- ) To south it extends to Barclays bank and excludes Morden Road cottages.

#### Issues

- ) Focusses on South Wimbledon underground station but still excludes some shopping parades along Merton High Street.

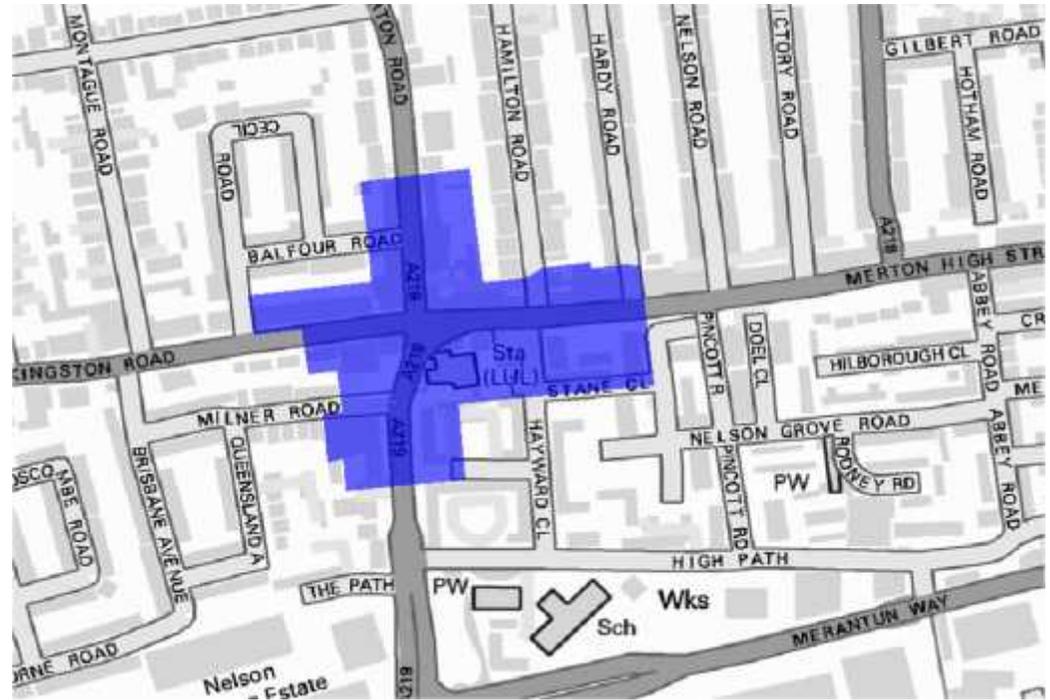


Figure 37: New local centre designation – South Wimbledon measured against the SA objectives

Designation and name	South Wimbledon local centre designation		
Proposed change	Creating a new local centre previously recognised with Colliers Wood as part of the Area of Intensification. Merton Council is now seeking to designate as a separate local centre with its own local distinctive identify which, will meet local needs and stimulate local growth		
Options	Option 1	Option 2	Option 3
Strategic Objectives			
Air quality			
Biodiversity			
Land and soil condition and pollutants			
Sustainable land use			
Heritage (including architectural and archaeological heritage)			
Flood risk management			
Climate change			
Noise and vibration			
Water quality			
Water consumption			
Open space and nature			
Sustainable transport			
Energy use			
Health and well being			
Housing			
Safe environments			
Population demands and growth			
Social inclusion and cohesion			
Design			
Local employment			
Education and skills			
Economic growth			

## 7 Mitigating adverse effects

- 7.1 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 of 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.

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

- 7.2 The whole of borough is an AQMA however, any development may result in an adverse impact as a result 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. 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 (2014) and Merton's Construction and Design Supplementary Planning Document (emerging). .

### **Climate Change and Energy**

- 7.3 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. Morden town centre regeneration due to the scale of development will increase the amount of energy consumed and is likely to result in an increase in greenhouse gas emissions and non-renewable sources of energy. Central to the case for regeneration is the need to improve the environmental performance of the dwellings of the town centre.

- 7.4 The council will continue to work closely with the GLA and the Heat Network Delivery Unit in order to deliver a site-specific energy strategy appropriate for each development site, in accordance with development plan policies. Further guidance is also provided in the Mayor's Sustainable Design and Construction SPG.

### **Transport**

- 7.5 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. Where the development proposals will have a significant impact upon transport a Transport Assessment 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.

### **Waste Management**

- 7.6 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**

- 7.7 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, 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. 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**

- 7.8 Where possible development proposals should 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 the use of green/brown roofs. Again any development proposal will need to have regard to the London Plan, NPPF as well as Merton's green infrastructure strategies and plans and health and wellbeing plans such as the Merton's Health and Wellbeing Strategy.

### **Viability and Deliverability**

- 7.9 To ensure the delivery of circa 2000 new homes, new retail offer and improved public realm in the highly accessible Morden Regeneration Zone site allocation area, a plan-led approach for the comprehensive regeneration of the area would be required. The site will not be able to deliver its potential economic, environmental and social benefits to the local community, if the delivery was to be a more fragmented manner.
- 7.10 Due to its substantial size, the large number and variety of land interests within the boundary, the significant infrastructure within the site and adjacent to the boundary and the need to maintain the town centre functions within the site, the deliverability of this site is very sensitive to any phasing options.
- 7.11 To mitigate the risks to the deliverability of this site, the council and TfL, who both own significant portions of land within the site are working closely together to jointly appoint a development partner to collaboratively develop a detailed, phased scheme to deliver the development by means of a plan-led approach. As with any development, delivery could be accelerated with the investment of additional funding. The council and TfL will continue to explore funding sources, such as those available from the GLA and other government bodies

## **8 Risk**

- 8.1 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. Uncertain impacts have been identified in

relation to several of the Sustainability Objectives. The uncertainty 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 AMR.

- 8.2 In the case of the Morden town centre regeneration a detailed phasing and plan-led approach will also be required to ensure disruption to residents and businesses is minimised as far as possible. A high level viability assessment will be required to be carried out to verify the current development assumptions. The viability assessment will need to look at planning obligations relating to affordable housing and other mitigation measures.
- 8.3 The financial modelling work for the Morden regeneration is on-going and updates will be made by the council to confirm the anticipated viability of the overall project as the project progresses. The current development assumptions will be subject to review as planning applications are prepared. Further detail is still required on some elements, e.g. the costs of demolition and the exact calculation of the Community Infrastructure Levy or subsequent developer levies. There are also risks largely outside the borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

### *Brexit*

- 8.4 A major impact outside the borough's control is Brexit and its transitional period (which the government calls 'implementation period'). It begins on 29 March 2019 and lasts until 31<sup>st</sup> 2020, then after this period technically the UK departs from the EU. At the time of writing this report the draft withdrawal agreement (November 2018) states, that the transition period can be extended, although only once and for a limited period (it does not specify length of period). Whatever the final timetable turns out to be and the period leading up to the actual leaving date, there will be without a doubt, a degree of uncertainty all of which will have an impact on the UK and London economy.
- 8.5 Normally London tends not be adversely impacted in time of economic turbulence or crisis as London tends to be more resilient, however most economic commentators believe that it is likely the London will feel the effects of Brexit and probably for a couple of years after. This uncertainty around Brexit and the type of Brexit and the possibility of a 'no deal'

will have an adverse impact at some level to the construction and housebuilding industries; all of which will probably have a direct impact to housing building and future developments across London and the UK.

## 9 Implementation

### *Links to other tiers of plans and guidance*

9.1 The Local Plan will have strategic links to other plans at local, regional and national level. Any links will become more apparent as the Local Plan progresses but, based on the issues identified they will be expected with, for example:

- ) Merton’s Strategic Flood Risk Assessment (level 1 2015 and level 2 2017)
- ) Emerging Local Implementation Plan: Transport strategy (2019)
- ) Emerging Merton Environmental Strategy (working title)
- ) Emerging Housing strategy

9.2 The list above is not exhaustive and there are more plans, programmes and policies identified in the Scoping Report to which links will be established as the Local Plan develops.

## 10 Proposed measures to monitor the environmental effects of the Local Plan

Figure 38: SA framework and decision making criteria for site allocations

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
Air quality To reduce emissions and concentrations of harmful atmospheric pollutants,	Number of days p.a. when air pollution is moderate or high for PM10*	Merton Council by way of Merton’s Annual Monitoring Report (AMR)	3 years

particularly in areas of poorest air quality and reduce exposure.	<i>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre, more than 35 times a year, at any measuring site</i>		
Biodiversity 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).	Changes of in areas of biodiversity importance.	Merton Council by way of Merton's AMR	3 years
Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.	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
Sustainable land use To make the best and most efficient use of land so as to support sustainable patterns and forms of development.	Planning permission grant and completed	Merton Council by way of Merton's AMR	Every year
Heritage (including architectural and archaeological heritage) 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	Every year

Flood risk management 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
Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Percentage reduction in carbon emissions from commercial and residential	Merton Council by way of Merton's AMR.	Every 3 years
	Proportion of new non-residential buildings over 100sqm to meet the relevant BREEAM "excellent" standard.	Merton Council by way of Merton's AMR	Annually by way of the Annual Borough Report (AMR)
Noise and vibration To minimise noise, vibration levels and disruption to people and communities.	An increase of areas of the Noise action planning important areas.	Defra	3 years
Water quality To protect and enhance Merton's water bodies.	Planning permissions 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	Environment Agency and Merton Council by way of Merton's AMR	Every year
Water consumption 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	

<p>Open space and nature 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</p>	<p>The proportion of net loss open space for development apart for educational establishments.</p>	<p>Merton Council by way of the AMR</p>	<p>Every year</p>
<p>Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</p>	<p>The proportion of journeys made by public transport and sustainable mode of travel</p>	<p>Merton Council and Transport for London (TfL) by way of the AMR</p>	<p>3 years</p>
<p>Energy use To manage and reduce demand for energy.</p>	<p>Average percentage improvement over Part L of the Building Regulations</p> <p>Installed capacity of renewable energy in Merton.</p>	<p>Merton Council by way of the AMR</p>	<p>2 years</p>
<p>Health and well being To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</p>	<p>Delivery of healthcare facilities.</p> <p>Number of people taking up physical activities and stating they are in 'good health'.</p> <p>Increase in footfall at bus stops, underground, tram stops and railway stations.</p>	<p>Merton Council, Merton Public Health, CCG and other health and wellbeing partners.</p>	<p>3-5 years</p>
<p>Housing To provide type, quality and tenure of housing (including specialist and</p>	<p>Proportion of affordable homes.</p> <p>Proportion of housing tenure</p>	<p>Merton Council by way of the AMR</p>	<p>Every year</p>

affordable provision) to better meet Merton's demographic change and local housing demand			
Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.	Number of Health Impact Assessments carried out and type of development.	Merton Council and Merton Public Health	3 years
Infrastructure 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.	Public Health, Pharmacy Needs Assessment	5 years
Social inclusion and cohesion To ensure Merton has socially integrated communities which are strong, resilient and inclusive.	Number of Health Impact Assessments carried out and type of development.	Merton Council and Merton Public Health	3 years
Design 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
Local employment 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

<p>Education and skills 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>	<p>Deliver to meet statutory delivery to secure sufficient school places.</p> <p>Number of 16- 24 year olds in training or apprenticeships or work programmes</p> <p>Number of new local people employed or in training as part of large or regeneration developments.</p>	<p>Merton Council by way of the AMR</p>	<p>Every year</p>
<p>Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.</p>	<p>Maintain the retail vacancy rate below national and regional rates.</p>	<p>Merton Council by way of the AMR</p>	<p>Every year</p>