



15. INFRASTRUCTURE

Strategic Policy IN16.1

Infrastructure

We support the provision and improvement of infrastructure across the borough and will work with relevant providers to ensure that the necessary infrastructure is secured to support growth in the borough over the plan period. We will:

- a. Expect new development to identify, plan for and provide any necessary infrastructure and require that, where necessary, infrastructure should be completed prior to occupation.
- b. Work with service providers and partners to enable them to deliver the provision of services and facilities for the projected population growth, especially in areas of significant new homes and areas of deficiency.
- c. Encourage dialogue between service providers and developers. Where appropriate opportunities arise, the co-location of services and joint delivery of infrastructure by service providers will be supported.
- d. Support the delivery of high-quality, high-speed and reliable digital infrastructure to enable the expansion of electronic communications networks, which include full fibre broadband connections and next generation mobile technology. Development proposals will be expected to provide digital connectivity infrastructure in accordance with London Plan Policy SI6.
- e. Support the provision of emergency services and facilities as required by emergency service providers.
- f. Expect infrastructure provision to be in keeping with the council's net zero carbon targets.

Justification

- 16.1.1.** The infrastructure needs for Merton will be primarily to support the additional housing required over the Local Plan period. We have identified strategic priorities for health provision, education, transport infrastructure, digital infrastructure, water and sewerage provision and supporting future needs of the emergency services. Where there is an infrastructure capacity problem, we will require developers to fund appropriate improvements and where necessary, ensure improvements are completed prior to occupation.
- 16.1.2.** The council will continue to encourage service providers and developers to interact with each other - pre, during and post planning application stage. This is to ensure that all necessary infrastructure can be identified and planned for and that where an opportunity arises for services to be co-located and jointly delivered, this can be done with minimal interruption to local residents and businesses.
- 16.1.3.** In accordance with national guidance on planning obligations, we will require new development to provide or fund local infrastructure improvements. The Community Infrastructure Levy will be applied as appropriate, alongside other investment, to help deliver infrastructure. Site-specific planning obligations will also be used to secure delivery of infrastructure needs arising from development.
- 16.1.4.** In order to support growth in the borough, the council will safeguard and improve essential social, physical and green infrastructure and work in partnership with service providers to ensure the delivery of the additional infrastructure. The potential and predicted infrastructure requirements for the Local Plan are identified in the Infrastructure Delivery Plan (2020) (IDP).

- 16.1.5. The IDP sets out the infrastructure needs for Merton over the lifetime of the Local Plan, through an analysis of current provision and the consideration of anticipated population and housing growth. The Infrastructure Delivery Schedule provides a list of infrastructure projects that have been identified for delivery within the first five years of the Local Plan, in addition to a number of longer-term projects. The council will continue to work with infrastructure partners, providers and stakeholders to identify and update requirements for the provision of infrastructure and services throughout the borough. The council will also seek to coordinate infrastructure delivery where it is appropriate to do so, while protecting local amenities and environmental quality.
- 16.1.6. In line with the London Plan, the relationship between green and social infrastructure is considered to be important in Merton, particularly given the ambition to create healthier places for all. We are committed to ensuring that there is adequate provision of community, social and open space facilities to improve the quality of life for residents. Further policies on social and community infrastructure are provided in Policy IN6.2 and open space, green infrastructure, sports and leisure facilities are considered in Chapter 8.
- 16.1.7. Ambitious net-zero carbon targets have been set of 2030 for the council and 2050 for the borough, designed to achieve a step-change in our actions to reduce emissions and adapt to the impacts of climate change. The [Merton Climate Strategy and Action Plan](#) recognises that the three major transitions to the economy, to building and energy and to transport all require substantial changes to infrastructure to be in keeping with emerging national and regional policies such as the London Mayor's [1.5 degree Action Plan](#), the National Government's [Clean Growth Strategy](#) and the views of the [National Infrastructure Commission](#).

Digital Infrastructure

- 16.1.8. Advanced, high-quality, high-speed and reliable communications infrastructure is essential for economic growth and social wellbeing. As such, the council supports the promotion and delivery of full-fibre or equivalent digital infrastructure. Future digital connections should be provided with a focus on affordability, security and resilience and should provide access to services from a range of providers.

- 16.1.9. Ofcom currently defines superfast broadband as being a minimum download speed of 30 megabits per second (Mbit/s), which is a measure of data transfer speed. High speed broadband can help businesses, through increased efficiencies, helping to drive jobs and economic growth. It can also help residents to access information, products and services more easily.
- 16.1.10. Merton has some areas with low or poor digital connectivity. According to [Ofcom's Connected Nations Update: Summer 2020](#), 2% of premises in Merton are unable to receive a minimum download speed of 30Mbit/s. We seek to improve this, and make Merton a digitally inclusive borough, by encouraging the expansion of digital infrastructure into areas where there are currently gaps in connectivity. This includes industrial areas across Merton, which historically have had poor connectivity. Applicants should work with the council and broadband delivery partners to find appropriate solutions to deliver broadband to new and existing residents and businesses.
- 16.1.11. We are also supportive of the provision of free publicly owned and available Wi-Fi in public realm areas. Fast and reliable digital infrastructure should be accessible to all; it helps support the way that people live and work, helps digital and creative industries to thrive and promotes innovation.
- 16.1.12. Operators should demonstrate through the planning process that equipment will operate within the International Commission on Non-Ionizing Radiation Protection guidelines for public exposure.
- 16.1.13. It is important to ensure that the installation of digital infrastructure, together with any necessary enabling works, will not result in unacceptable damage to visual amenity or harm to environmentally sensitive features or locations. Specific design requirements for digital infrastructure are set out in Chapter 5 – Design.

Water and Wastewater

- 16.1.14. To accommodate the expected population and housing growth across the borough, the council is supportive of improvements and upgrades to water supply and wastewater services, to contribute to security of supply.

16.1.15. The council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off-site to serve the development and that the development would not lead to problems for existing users. In some circumstances this will necessitate that developers carry out appropriate studies to ascertain the effect proposed development will have on the existing infrastructure. Overloading of the system will not be permitted. Where there is a capacity problem the developer will be required to fund appropriate improvements to be completed prior to completion of the development. An exception to this may be where the water company has improvement works programmed in that align with the completion time of the development.

16.1.16. Thames Water will work with developers and the council to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Developers are encouraged to contact the water and waste water companies as early as possible to discuss their development proposals and intended delivery programme to assist operators with identifying any potential water and wastewater network reinforcement requirements. Where appropriate, planning permission for development which results in the need for off-site infrastructure upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.

Gas and electricity

16.1.17. We will continue to work with utility suppliers, and expect developers to do the same, to ensure that the safe and secure supply of utilities such as electricity and gas is not compromised, as we transition towards a low carbon energy supply.

16.1.18. It is estimated that gas is currently responsible for around 40% of greenhouse gas emissions in Merton, mostly from heating residential properties. Whilst greenhouse gas emissions from electricity production are [predicted to fall substantially](#), there are [limited options](#) to reduce emissions from gas. Until a national strategy to decarbonise the gas grid has been developed, the council will support activities to move away from natural gas and towards electrification and other forms of low carbon heating and cooking. This is likely to result in a reduction in demand of up to [1TWh gas per year by 2050](#), in accordance with GLA zero carbon pathway modelling.

16.1.19. Demand for electricity is likely to increase over time, mainly due to a transition away from gas heating and cooking towards electric heating, and an increase in uptake of electric vehicles. The additional demand is estimated to be around [50GWh/year by 2050](#) (GLA zero carbon pathway modelling), but is uncertain and is influenced by the extent to which local renewable energy and energy storage is installed (e.g. solar PV and battery technology), and the roll out of smart technologies which serve to actively manage the peaks in electricity supply.

16.1.20. National Grid owns and operates the high voltage electricity transmission system in England and UK Power Networks owns the electricity distribution network. National Grid also owns and operates the gas transmission system, whereby gas leaves the transmission system and enters the distribution networks at high pressure.

16.1.21. Southern Gas Networks owns and operates the local gas distribution network in Merton. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply.

- 16.1.22.** National Grid's underground electricity transmission cables cross through Colliers Wood and Mitcham. In addition, the National Grid's high voltage overhead electricity transmission lines crosses along the Wandle Valley through Colliers Wood. Three of the proposed Site Allocations in Chapter 3 (CW5, Mi1 and Mi16) contain or are within close proximity to the National Grid Infrastructure. Potential developers of sites with overhead lines should be aware that it is National Grid policy to retain existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.
- 16.1.23.** We will continue to work with UK Power Networks to explore the extent to which the electricity distribution network requires upgrading; and the approach needed to minimise cost and disruption.
- 16.1.24.** Developers must take into account the location and nature of the existing electricity transmission equipment when planning developments. Guidance is outlined in [National Grid's "A Sense of Place"](#) guidelines on how to create high quality development near overhead lines.

Transport

16.1.25. Merton's emerging Climate Strategy and Action Plan recognises that a wholescale change in the way we travel in Merton is required to reduce greenhouse gas emissions from petrol and diesel vehicles, which are estimated to account for 19% of greenhouse gas emissions in the borough. By 2050 virtually no petrol and diesel vehicles will use Merton's roads. To support a major increase in cycling and walking, a reduction in the use of private vehicles and a shift to electric vehicles and an integrated cycling, walking and electric vehicle charging network will take place.

16.1.26. Public transport accessibility is not evenly spread across the borough and more deprived areas such as parts of Mitcham and Morden neighbourhoods currently have lower levels than some of the western areas of the borough. We will continue to work with the relevant public transport partners, including Transport for London and Network Rail to deliver better transport services, as identified in the Infrastructure Delivery Plan and improve accessibility and connectivity. Refer to the Transport policies for further details.

Policy IN16.2

Social and Community Infrastructure

We place a high priority on the provision and improvement of social and community infrastructure. It is essential to support those currently living, working and visiting Merton and to ensure future changes can be accommodated. These places can be the heart of local communities and they are important to ensure residents have a high quality of life. We will:

- a. Support and encourage the most effective use of social and community infrastructure, to support the changing priorities and needs in the borough.
- b. Require any proposals involving the loss of social and community infrastructure to clearly demonstrate:
 - i. that the loss would not create, or add to, a shortfall in provision for the specific use, through providing a Community Needs Statement; and
 - ii. that there is no viable demand for any other social and community infrastructure use on the site, through providing marketing and vacancy evidence for a period of at least 12 months.
- c. Consider other uses through redevelopment, where the council is satisfied that the evidence in (b) has been provided and the change of use away from the social and community infrastructure use has been justified.
- d. Support and encourage the multi-use of social and community infrastructure.
- e. Support proposals for new, or extensions to existing, social and community infrastructure where:
 - i. it provides for an identified need.
 - ii. it is of a high quality and inclusive design providing access for all.
 - iii. it is provided in multi-use, flexible and adaptable buildings or is co-located with other social infrastructure uses, where practicable.

- iv. it is accessible by a range of transport modes including walking, cycling and public transport.
- v. appropriate access, parking and cycling facilities are provided, relative to the location and scale of the development; and
- vi. the use(s), including hours of operation, would not unacceptably harm the amenities of the surrounding area.

HEALTH

- f. Support the provision of new or improved healthcare facilities in the borough, working in partnership with Merton's Clinical Commissioning Group (CCG) and NHS England to meet the needs of Merton's projected population growth, especially in areas of regeneration or areas of deficiency.
- g. Support the aim of improved access to primary health care facilities, which could extend GP surgery hours and support the re-use of social infrastructure and the re-location of services, wherever possible.
- h. Support the principle of a new Health and Wellbeing Community Hub in Mitcham.

EDUCATION

- i. Support proposals for new primary and secondary schools, or for the extension or expansion of existing schools including Special Educational Needs (SEN), where they help to deliver the council's agreed strategy for provision of additional state-funded school places in the borough and where they meet the requirements set out in the London Plan education policy S3B.
- j. Resist proposals involving the loss of a state-funded school either in use, or previously in use, unless the council's agreed strategy for school places has identified the site as surplus and its development for other uses would contribute to improvements in the delivery of school places in the borough.

Justification

- 16.1.28.** Taken as a whole, social and community infrastructure covers a wide variety of uses. These include community and affordable meeting spaces, libraries, places of worship, education, youth services, childcare and early years, health and social care, services for the elderly or disabled, sport, recreation, informal play spaces, emergency services and other criminal justice or community safety facilities. This list is not intended to be exhaustive and other uses can be included as social and community infrastructure.
- 16.1.29.** These places can be publicly or privately funded or run by charities, free at the point of delivery or paid for. There are a variety of different needs for social and community infrastructure at different stages of people's lives. These types of infrastructure also play an important role in developing strong and inclusive communities by providing opportunities to bring together different groups of people.
- 16.1.30.** Many of these services are also a major source of employment in Merton; civic and government functions such as schools, the NHS, the fire brigade and other local government sectors are large employers in Merton with a range of jobs in terms of salaries and skills.
- 16.1.31.** It is essential that new and existing residents in Merton can access social and community infrastructure, to ensure people have a good quality of life. The council works closely with its partners, particularly the NHS and the Department of Education to ensure the necessary provision of healthcare and school places to meet resident's needs.
- 16.1.32.** Sports and leisure facilities (including Playing Pitches), should also be tested against paragraph 97 of the NPPF and considered against the requirements of London Plan Policy S5. Further policies on these facilities are provided in Chapter 8.
- 16.1.33.** Where appropriate, the use of S106 or planning conditions will be used to ensure delivery of required infrastructure in the borough.

Use Classes Order

- 16.1.34. In 2020, Government introduced successive statutory instruments and changes to the Use Classes Order. These changes include the creation of new Use Classes for Class E (Commercial, Business and Service), Class F.1 (Learning and Non-residential institutions) and Class F.2 (Local community), and changes to the list of Sui Generis uses (uses that cannot be included in a specific class).
- 16.1.35. The government's [Explanatory Memorandum](#) states that these changes were "primarily aimed at creating vibrant, mixed use town centres by allowing businesses greater freedom to change to a broader range of compatible uses which communities expect to find on modern high streets, as well as more generally in town and city centres."
- 16.1.36. The recent changes to the Use Classes Order allow some premises to change uses without planning permission e.g. nursery or health centre to a shop, café, restaurant. Merton is supportive of the principle of greater flexibility for what business and community spaces can be used for, however we will also seek to minimise any unintended harm that flexible proposals could bring to the local amenity of existing residents and future users.
- 16.1.37. The council will assess planning applications in line with this policy for any proposals that involve changes to, or a loss of social and community infrastructure. Planning conditions or obligations may be used to ensure no harm to the local amenity of existing residents and future users.

Protect Existing Uses

- 16.1.38. We will safeguard existing social and community uses unless there is adequate justification for the loss, or provision for a replacement.
- 16.1.39. Applications proposing a loss will have to demonstrate that the social or community infrastructure use is no longer viable on the site. For the purpose of policy IN6.2 (b) and (c), a social or community infrastructure use refers to clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law courts, and non-residential education and training centres. Applicants will have to provide the following information:

1. A COMMUNITY NEEDS STATEMENT

16.1.40. This is required to clearly set out the reasons why the site is unable to support social and community uses and why the existing use is no longer required on site. Where there is a proposal for a replacement, relocation or consolidation of a use, this document will also need to demonstrate that the needs of the current users of the site have been considered and an appropriate facility can be provided elsewhere.

16.1.41. Applicants are encouraged to discuss the scope and content of the Community Needs Statement with the council at an early stage, preferably through the Pre-Application process, to ensure that the information provided is proportionate to the scale and significance of the proposed change or loss.

16.1.42. The following should be covered by a Community Needs Statement:

- The reasons why there is no longer an identified community need for the facility. This may include reasons why a facility no longer meets the needs of its users.
- Details of the current/former service provided on site and if relevant, information on how a better service would be provided elsewhere. This may include information on physical constraints such as access or user requirements.
- Evidence showing that consultation with current/former users of the use on the site has taken place, including feedback on the proposed changes.
- Details on all engagement with the relevant stakeholders that are involved in providing services on site, or that rely on the provision of services on site. For example, the Merton CCG and NHS; and
- Details of any alternative locations that have been identified and assessed as being suitable for co-location.

16.1.43. Additional information may be requested by the council, where required.

2. MARKETING AND VACANCY EVIDENCE

16.1.44. This is required to provide an assessment of the continued demand for the existing use and all other suitable social and community uses that could be accommodated on the site. The marketing and vacancy evidence will need to be provided for a minimum period of 12 months and should be carried out in accordance with the criteria set out in the Appendices.

Support Co-Location

16.1.45. In line with the London Plan, the council supports proposals that make the best use of land, including the co-location of uses such as schools, colleges, sports and community providers for the wider community. This is particularly relevant where these are located in areas that are highly accessible.

16.1.46. We strongly encourage the shared use and co-location of sites, which allows for land to be used more efficiently, assists service providers to work collaboratively and provides for the sharing of maintenance and management costs. Shared facilities that adopt principles from the Healthy Streets Approach and are easily accessible by public transport, cycling and walking will enable greater community inclusion and participation.

16.1.47. We will also support the shared use of community sites by different service providers across the public, private and voluntary sector, for example as is being planned at the Wilson Health and Wellbeing campus.

The Provision of New Social and Community Uses

- 16.1.48.** We will support the development of new social and community infrastructure uses where there are identified gaps in provision.
- 16.1.49.** The location and layout of social and community infrastructure is often determined by the type and use of the site, for example the area reached by a local fire station can be far wider than the area needs of a primary school. We will require new development proposals to ensure that these places are easily accessible and well connected; they should be easily reached on foot, bicycle or by public transport and fully accessible to all parts of the community, including people with a disability and older people.
- 16.1.50.** Social and community infrastructure provides opportunities to develop strong and inclusive communities, contributing to social integration and the desirability of a place. New social and community infrastructure provided as part of major developments should be made available to all residents, irrespective of tenure. Proposals should also include a plan for the management and maintenance of new developments, which may be formalised through the use of planning conditions or obligations. We will also support new proposals which promote and incorporate a circular economy.

Health

- 16.1.51.** A key aim for the council is to encourage healthier communities by improving health outcomes and reducing health inequalities. Appropriate infrastructure needs to be in place to support health and wellbeing, encourage the provision of sport and leisure facilities and support the health and housing services for our community, particularly the vulnerable members of the community.
- 16.1.52.** An ageing and changing population and an increase in long term and complex health conditions places additional demands on health and social care and has implications for the accessibility of services and importance of preventing social isolation. We will continue to work closely with partners including the Merton CCG and NHS England to ensure that primary healthcare will be provided to meet the needs of the changing population.

16.1.53. The Merton Borough Health and Care Estates Strategy is currently being collaboratively revised by the Merton Borough Estates Group and updated, with the final document to be approved by the Merton Health & Care Together Board. The draft Strategy sets out the vision and priorities for healthcare in Merton, to align with the new Local Plan. The Strategy looks to support independence, good health, wellbeing and accessible person-centred care, through a partnership approach across the borough.

16.1.54. The Strategy includes an up-to-date assessment of the following sites in the borough and sets out the future health priorities based on the projected population and housing growth:

- GP surgeries.
- Primary Care Networks.
- Properties owned by NHS Property Services and other providers; and
- Vacant and underutilised health spaces.

16.1.55. The draft Strategy has informed the preparation of the Merton Infrastructure Delivery Plan (IDP). Further updates will be made to this document as they become available.

16.1.56. One of the key priority areas identified in the draft Strategy is a new Mitcham Health and Wellbeing Community Hub, which is supported by the council. The CCG has been working with a number of stakeholders to bring forward plans for a new health and wellbeing space in Mitcham, ensuring that vacant and underutilised sites are brought back into use.

Education

16.1.57. The council will continue to support new and improved childcare and education facilities in response to population changes and borough migration patterns and will work closely with partners and neighbouring boroughs where necessary to ensure that all children in Merton have access to good quality education.

- 16.1.58.** The need for school places in Merton for children aged 0-19 years and for Special Educational Needs (SEN) is set out in the council's annual assessment of needs for state funded school places – the last report on Merton School Places is dated October 2019. These needs have been set out in the Infrastructure Delivery Plan and are updated every year to maintain accuracy.
- 16.1.59.** State-funded schools include local authority-maintained schools (community, foundation and voluntary aided and controlled schools), Academies and free schools.
- 16.1.60.** The shared use of education facilities is strongly encouraged, to ensure the effective use of a variety of community, social, educational and leisure facilities. The sharing of facilities can help to minimise travel distances for users and can provide greater overall social benefits to the local community.
- 16.1.61.** Proposals for new or improved education facilities will be expected to be designed to incorporate elements that can be shared or accessed by the wider community, outside of main school operating hours, or demonstrate why this has not been possible. Such uses can include sports and community halls, training and meeting facilities, play spaces, nurseries, children's centres, cultural or youth facilities and sports pitches and multi-use games areas.
- 16.1.62.** Community use agreements may be necessary to ensure community access is properly managed and maintained. Shared access must be safe and adaptable.
- 16.1.63.** Proposals for nurseries and childcare facilities should include access to an outdoor play area, of sufficient size and quality to meet the needs of the facility. This should be located away from, or be screened from, roads and other areas with poor air quality.

Strategic Policy W16.3

Waste Management

- a. We support the objectives of sustainable waste management set out by the government in the National Planning Policy for Waste and the Mayor's London Plan.
- b. We will continue to work in collaboration with the neighbouring south London boroughs of Croydon, Kingston-upon-Thames and Sutton to maximise self-sufficiency and meet the apportionment tonnages required by the London Plan for south London. The South London Waste Plan sets out the long-term vision, spatial strategy, policies and sites for the sustainable management of waste, and a monitoring framework to assess the success of the policies.
- c. We will increase recycling rates and address waste as a resource, looking to disposal as the last option, in line with the waste hierarchy. To support recycling, the council will require integrated, well-designed waste storage facilities that will include recycling facilities for all new developments where appropriate.

Justification

- 16.1.64.** In March 2012, the London boroughs of Croydon, Kingston, Merton and Sutton adopted the South London Waste Plan as part of each borough's Local Plans.
- 16.1.65.** The South London Waste Plan provides the essential infrastructure to support housing growth in south London by safeguarding existing waste treatment sites, identifying sites and areas suitable for new waste facilities and includes planning policies that both ensure that waste arising in the boroughs are managed within the South London Waste Plan area and that new or redeveloped waste treatment facilities have the least impact on nearby uses and the environment.
- 16.1.66.** In 2018, the London boroughs of Croydon, Kingston, Merton and Sutton started working on the next version of the South London Waste Plan, making the most of their strong track record and commitment to joint working and helping to deliver the new London Plan's policies and de-risk the delivery of essential infrastructure for south London. The new South London Waste Plan will address waste management needs during the 15-year period from 2021 till 2036.
- 16.1.67.** Waste treatment is a strategic planning issue across London and a challenge for all successful urban areas. There is a significant need for new homes in south London which generates the requirement for essential waste treatment infrastructure to support this growth. More than a million people already live in south London and there is a significant challenge in providing such essential infrastructure within a heavily urbanised area.
- 16.1.68.** South London is seeking to meet this challenge by delivering its share of the London Plan's waste policies while meeting the ambitious targets for new homes in the same geographic area. The London Plan sets the target of managing 100% of London's waste within Greater London by 2026 and having zero biodegradable or recyclable waste going to landfill by 2026. It also sets targets for municipal waste, commercial and industrial waste, construction and demolition waste and excavation waste (Intend to Publish London Plan, December 2019, Policy SI 8).

16.1.69. With significant need for new homes and consequent commercial activity planned across London, the need to provide essential infrastructure such as waste facilities to meet this growth is therefore a regional strategic priority.