Sustainability Appraisal Report
(Incorporating Environmental Report)

London Borough of Merton

Sites & Polices DPD + Proposal Map
Preferred Options Stage 2a

July 2012.

Introduction

This sustainability appraisal relates to Stage 2a of Merton's *Sites and Policies Development Plan Document* - the continuation of the Council's preferred options.

1 Purpose of Sustainability Appraisal

1.1 The purpose of sustainability appraisal (SA) is to promote sustainable development by integrating social, economic and environmental considerations into the preparation of new or revised Local Development Frameworks (LDF). By identifying the key sustainability issues likely to be affected by the implementation of a plan, developing options and assessing any significant effects from the earliest stages of plan preparation. Therefore, SA's are an important tool for developing sound planning policies which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.

1.2 The EU Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK by the SEA Regulations 2004, requires environmental assessment to be undertaken on all plans and programmes where they are likely to have significant environmental impacts. The purpose of the Directive is to provide for a high level of environmental protection and to contribute to the integration of environmental considerations into the preparation of plans and programmes with a view to promoting sustainable development.

1.3 The regulations apply to a wide range of plans and programmes from local to regional level, including local development documents.

1.4 **Sustainability appraisals should be:**

- inclusive; ensuring early and on-going involvement of the public, statutory authorities and other stakeholders at the appropriate stages of plan preparation;
- objectives-led; so that the direction of desired change is made explicit in terms of measurable targets;
- evidence-based; including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- Useful; providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.

1.5 At the conclusion of plan preparation, the final SA report should show how the final plan has addressed the sustainability agenda and the choices made between alternative policies and proposals. This will be considered by the Inspector when determining the soundness of the plan at the Public Examination stage.

1.6 This SA Report sets out the outcome of the SA/SEA process of the additional polices and potential sites allocations in the Site and Polices Development

Management Plan: preferred options document and further changes to the Proposal Map.

1.7 This document forms a Sustainability Appraisal Report (SAR) incorporating the requirements of a strategic environmental assessment (SEA Directive1). It provides an account of the process of sustainability appraisal and has been conducted in line with the Communities and Local Government (CLG) Plan Making Manual 2 and the CLG SEA Practical Guide (2005).

CLG guidance identifies five stages to undertaking sustainability appraisal:

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

1.8 Through the application of the process, the council has identified the scope for sustainability appraisal, key sustainability issues, and the likely impacts of the implementation of the plan.

2 Background to LDF

2.1 The Local Development Framework (LDF) will replace the Unitary Development Plan 2003. It will provide a wider spatial planning framework and will seek to provide guidance for the Merton's Sustainable Community Strategy (2009-2019) formally also known as the Community Plan. It looks forward 15 years and will set out strategies and polices for the development and use of land as well as broader spatial matters. It consists of a number of separate documents setting out different types of planning guidance.

2.2 The LDF contains a number of documents, known as Development Plan Documents (DPD), which will make up part of the Development plan for Merton:

- Core Planning Strategy DPD
- Site and Policies DPD
- Proposals Map
- South London Waste Plan DPD

2.3 The current document being prepared is the Site and Polices DPD and Proposals Map. The details of other LDF documents already prepared or proposed are provided in the Local Development Scheme (LDS).

[1] European Directive EC/2001/42 and the subsequent SEA Regulations 2004
[2] See Planning Advisory Service www.pas.gov.uk

2.4 The adopted Core Planning Strategy 2011 is the key document in the Merton LDF. It sets out the Merton's strategic objectives of the planning framework for the borough. All other DPD's must be in conformity with this document.

2.5 The Core Planning Strategy brings together strategies relating to land use in an integrated manner to provide a long term spatial vision and means to deliver that vision.

3 Purpose of the Sites and Polices DPD and Proposal Map

3.1 As highlighted before in the January 2012 SA (preferred Option Stage 2) and earlier in this report, the Site and Polices DPD; forms part of Merton's Local Development Framework (LDF). It contains policies to help the council to implement its Core Planning Strategy polices to ensure all proposed appropriate development reflects the spatial vision for the borough, regional and national guidance.

3.2 The Sustainability Appraisal for the development management policies has been undertaken in full using the Sustainability Framework in the same format as the Core Planning Strategy. However, to reduce the length of this SA document the full set of tables has not been included, instead a set of summary tables and brief summary of the important points has been set out. In line with government guidance this is appropriate as the appraisals level of detail has been applied in accordance with the spatial scale, size and possible environmental effects of the policies.

3.3 Overall, the policies in the Sites and policies DPD performed well against the sustainability objectives. This reflects the approach to selecting development sites for inclusion in the document, sites with significant planning constraints and those which contradict Merton's spatial strategy and vision were excluded.

3.4 The assessment has identified a small number of sites with negative, uncertain or no significant effects in relation to specific sustainability objectives. These findings will inform the next stage of the document's preparation by highlighting opportunities to mitigate adverse effects by for example modifying a site's boundary, revising a site's allocation/designation, or by excluding a site altogether.

3.5 This assessment will also provide a basis to consider opportunities to maximise the sustainability benefits of sites included in the document or in conjunction with further revisions to the Sites and polices DPD and Proposal map.

3.6 The proposed changes to the proposal map is the presentation on a map of the borough of policies and sites mentioned in Merton's Core Planning Strategy, the Sites and policies DPD and the South London Waste Plan DPD. The Proposals map, when adopted, will identify the areas of Merton to which the various development plan policies will be applied.

3.7 In accordance with national guidance note 1, the LDF Proposals Map for Merton will therefore show the following information:

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

3.8 Once the LDF Proposals Map is adopted it will support the Core Planning Strategy DPD, South London Waste Plan DPD and Sites and policies DPD, and will replace Merton's adopted Proposals Map (2003).

What is sustainable development?

3.9 Sustainable development seeks to achieve improved quality of life, community well- being and sustainable economic growth while protecting against environmental deprivation, depletion of resources and loss of biodiversity. The most commonly used definition is *"development that meets the needs of the present without compromising the ability of future generations to meet their needs"* (Bruntland, 1987).

3.10 The revised UK Sustainable Development Strategy (March 2005), Expands further on what sustainable development means in terms of the following five principles of sustainable development are identified in 'Securing the Future':

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

3.11 The National Planning Policy Framework (NPPF) (April 2012) sets sustainable development at the heart of the planning system. The NPPF set out the Government's planning policies for England and how these are expected to be applied. The NPPF sets out the requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.

3.12 The NPPF seeks to provide a framework within local councils that are accountable to local people, assist local people to produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

3.13 The 3 objectives of the NPPF are:

- To put unprecedented power in the hands of communities to shape the places in which they live;
- To better support growth and give the next generation the chance that present generation has - a decent home, and to allow the jobs to be created on which our prosperity depends; and

- To ensure that the places we cherish - our countryside, towns and cities are bequeathed to the next generation in a better condition than they are now.

3.14 Merton Council has published a Waste Management Strategy, a Sustainable Community Strategy and a Climate Change Strategy which set out in detail context for sustainable development in the borough. The preparation and implementation of planning documents within the LDF will take the agenda forward by setting out a spatial strategy for growth, policies to guide development proposals and plans for specific areas of the borough. The timetable for producing the Local Development Documents is set out in the Local Development Scheme (LDS).

3.15 This document forms a Sustainability Appraisal Report (SAR) incorporating the requirements of a strategic environmental assessment (SEA Directive3). It provides an account of the process of sustainability appraisal and has been conducted in line with the Communities and Local Government (CLG) Plan Making Manual 4 and the CLG SEA Practical Guide (2005).

CLG guidance identifies five stages to undertaking sustainability appraisal:

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

3.16 Through the application of the process, the council has identified the scope for sustainability appraisal, key sustainability issues, and the likely impacts of the implementation of the plan.

Consultation Arrangements

3.17 The consultation arrangements for this SA report and Sites and polices DPD and Proposal map preferred options are inline with Merton Council's Statement of Community Involvement (SCI). These can be viewed on Merton council's website here: www.merton.gov.uk/planning/planningpolicy

3.18 In accordance with the SEA Regulations copies of this report have been sent to:

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

[3] European Directive EC/2001/42 and the subsequent SEA Regulations 2004
[4] See Planning Advisory Service www.pas.gov.uk

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

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

Equalities Impact Assessment

3.19 The Race Relations Amendment Act 2000, Disability Discrimination Act 2005 and the Equality Act 2006 require an Equality Impact Assessment (EqIA) to be carried out for all services and policies delivered by Local Authorities.

3.20 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.

3.21 An EqIA of Merton's Core Planning Strategy was undertaken in July 2010. This considered the equality Impacts on the groups against Core Planning Strategy key themes, which included housing, employment, community facilities, transport and accessibility. The development polices complement the Core Planning Strategy, by providing detailed to guide development and to be used in the assessment of planning applications. An EqIA was also undertaken for the South London Waste Plan in 2011.

3.22 The policies in the Sites and policies DPD and Proposal map all fall within one of the key themes assessed in the Core Planning Strategy EqIA. As the Core Planning Strategy sets out the key elements of the planning framework for Merton, and has already been subject to full EqIA, it is not necessary to include this for Part 1: draft detailed development polices. An summary EqIA has been carried out for the stage 2a for the polices to be included in the Sites and polices DPD and is available on Merton's website via www.merton.gov.uk/planning/ldf

4 Appraisal methodology

4.1 The council's approach to undertaking Sustainability Appraisal (SA) in the preparation of the Site and Policies DPD, as with all other LDF documents, is in line with Government guidance on 'SA of Regional Spatial Strategies and LDFs' published by the former ODPM in 2005. The guidance is also designed to ensure adherence with the European Strategic Environmental Assessment or 'SEA' Directive 2001/42/EC and the SEA Regulations.

4.2 Government guidance identifies 5 stages of appraisal (A to E) that must be carried out as part of the preparation of DPDs. The key tasks are outlined below. Full comprehensive details of each stage can be found in the January 2012 sustainability appraisal for the Sites and policies DPD and Proposal map.

Table 1: Stages of a Sustainable Appraisal

DPD STAGE 1 – Pre-production/Evidence Gathering
Stage A: Setting context/objectives; establishing baseline and deciding scope • A1: Identifying other relevant policies, plans and programmes, and sustainability objectives. • A2: Collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework • A5: Consulting on the scope of the SA.
DPD STAGE 2 – Production
Stage B: Developing and refining options and assessing effects • B1: Testing the DPD objectives against the SA framework. • B2: Developing the DPD options. • B3: Predicting the effects of the DPD. • B4: Evaluating the effects of the DPD. • B5: Considering ways of mitigating adverse effects and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the DPDs. **Stage C: Preparing the Sustainability Appraisal Report** • C1: Preparing the SA Report **Stage D: Consulting on the preferred options of the DPD and SA Report** • D1: Public participation on the preferred options of the DPD and the SA Report. • D2 (i): Appraising significant changes.
DPD STAGE 3: Examination
• D2 (ii): Appraising significant changes resulting from representations.
DPD STAGE 4: Adoption and monitoring
• D3: Making decisions and providing information (Adoption Statement)

Stage E: Monitoring the significant effects of implementing the DPD
• E1: Finalising aims and methods for monitoring. • E2: Responding to adverse effects.

4.3 The framework that is used to appraise changes to be included in the Site and polices DPD and Proposal map consists of sustainability objectives, indicators and targets. These three elements have been identified by the process of preparing the initial Scoping Report (2006) and through subsequent consultation. The 21 sustainability objectives set out in Table 2 represent a revision of the objectives, but have incorporated all of the original subjects.

4.4 Significant issues arising include the fundamental conflict between social and economic development and harm to habitats; the difficulty in determining whether a focus on using previously developed land may have an adverse or beneficial impact on congestion and, consequently, air quality; and the potential increased cost of using previously developed land could affect viability of delivering affordable homes.

Table 2: Sustainability Framework objectives

Sustainability objectives	**Indicators and targets** (source of data in brackets)
1. Climate change	Planning to adapt to climate change seeks to embed the management of climate change by • assessing risks and opportunities; • taking action in any identified priority areas; • develop an adaptation strategy and action plan and • implement, assess and monitor the actions on an ongoing basis. Evidence will be required that the local authority has put in place a mechanism for proactively managing climate risks and opportunities in their decisions, plans and measures on the ground. For climate change gas emissions – see SA Objective 2 and SA Objective 9. For water resources see SA Objective 7.
2. Energy and carbon reduction	**Renewable energy capacity** Per capita reduction in CO2 emissions in the LA area (www.decc.gov.uk); emissions of CO2 to be reduced by 60% of 1990 levels by 2025 (London Plan) and 80% by 2050 (Climate Change Act 2008) The Home Energy Conservation Act 1995

	requires an improvement in energy efficiency, as measured in the annual HECA report, of 30% 2006 - 2011.
3. Biodiversity	95% of SSSIs to be in favourable or recovering status. Increase coverage of Sites of Importance to Nature Conservation (www.gigl.org.uk)
4. Access to nature and open space	There should be no areas deficient in access to open space (Merton Open Space Study).
5. Natural resources	Number of contaminated sites See SA Objectives 2, 6, 7, 9 and 10.
6. Waste	**Reduce waste, increase recycling:** Residual household waste per household. The targets for this indicator, in Merton, are 733 kg/hh by 2008/09, 712 kg/hh by 2009/10 and 716 kg/hh by 2010/11 Household waste reused, recycled and composted National Indicator 193: Municipal waste land filled
7. Water quality and resources	Improve the biological and chemical status of the River Wandle and Beverly Brook to good by 2027 (Environment Agency)
8. Flooding	**Compliance with Flood and Water Management Act 2010** As required under The Flood and Water Management Act 2010 the council will monitor local flood risk in Merton through its Local Flood Risk Management Strategy. The council will maintain, review, update as well as apply and monitor the application.
9. Air quality	**Meet the United Kingdom National Air Quality Strategy Standards:** Benzene 5 mg/m3 Annual Mean 31 Dec 2010; 1, 3 Butadiene 2.25 mg/m3 (1 ppb) Running Annual Mean 31 Dec 2003; Carbon Monoxide 10 mg/m3 Daily Maximum Running 8 hour mean 31 Dec 2003; Lead 0.25 mg/m3 Annual Mean 31 Dec 2008; Nitrogen Dioxide 200 mg/m3 (105 ppb) not to be exceeded more than 18 times a year (1 hour mean) 40 mg/m3 (21 ppb) Annual Mean 31 Dec 2005 31 Dec 2005; Particles (PM 10) 50 mg/m3 not to be exceeded more than 35 times a year (24 hour mean) 31 Dec 2010,

	23ug/m3 Annual Mean 31 Dec 2010, 20ug/m3 24 hour mean Annual mean 31 Dec 2015; Sulphur Dioxide 125 mg/m3 (47 ppb) not to be exceeded more than3 times a year (24 hour mean) 31 Dec 2004, 266 mg/m3 (100 ppb) not to be exceeded more than 35 times a year (15 minute mean) 31 Dec 2005.
10. Land use	60% of development on previously developed land.
11. Health and well being	Increase proportion of the population within 0.5 miles (0.8km) of a health centre. Life expectancy at birth 50% reduction in people killed or seriously injured: 60% reduction in child KSIs by 2013
12. Poverty and social inclusion	Address issues raised by Index of Multiple Deprivation data (www.defra.gov.uk) Increase proportion of the population within 0.5 miles (0.8km) of community/leisure facilities. Reduce fuel poverty (NI 187) (www.decc.gov.uk) Income Support Claimants (www.statistics.gov.uk)
13. Diversity and equality	Comply with the Statement of Community Involvement and undertake Equality Impact Assessment to inform the plan.
14. Basic needs	Access to resources, housing and essential services. See Appended Maps, SA Objective 15 and SA Objective 19
15. Transport	Improve accessibility by all modes Improve public transport accessibility (MBC) 33% reduction in the number of trips by road
16. Culture, leisure and social activities	Increase proportion of the population within 0.5 miles (0.8km) of cultural and community/leisure facilities See SA Objective 4 and SA Objective 17.
17. Historic environment	Reduce heritage buildings at risk (English Heritage) No loss of Listed Building, Historic Park and

	Garden or Scheduled Ancient Monument Number of Conservation Area Appraisals
18. Crime and fear of crime	Maintain low rates of crime and reduce fear of crime (Merton annual residents' survey)
19. Housing	Meet housing need – 320 units per year Affordable Housing - 10 units and above: 40% on site - between 1-9 units: 20% cash in lieu to create additional affordable homes
20. Education and skills	Increase educational attainment and improve skills match to employment: Number of pupils getting grades A-C at GCSEs (www.dcsf.gov.uk) People achieving NVQ Level 4 and above (www.nomisweb.co.uk)
21. Work and the economy	Provide employment land and support access to employment Number and proportion of economically active employed and number and proportion of people unemployed (www.nomisweb.co.uk)

Table 3: The key issues for sustainability objectives

Sustainability objectives	Key issues
7. Water quality and quantity	Climate change, population growth and lifestyle choices are [illegible]
8. Flooding	brook and their tributaries. Surface water flooding is also an issue in some isolated parts of the borough.
1. Climate change	Climate change is a threat to the lifestyles of Merton residents and to wildlife, cultural heritage and material assets. It is predicted that higher temperatures and lower rainfall may be experienced in the south east. In addition to drinking water shortages, falling groundwater levels could lead to increased risk of subsidence and, where heavy rain falls on a parched ground in late summer the risk of flooding could increase. Green roofs, rain water harvesting, water storage, sustainable drainage and passive cooling.
9 Air quality	Air quality is improving but there is further scope to reduce atmospheric pollution across the borough by supporting public
2. Energy and carbon reduction	The London Plan seeks exemplary approaches to waste, energy and water use, management and provision. Merton has been in the forefront for developing strategy for carbon reduction through the 'Merton Rule' and is eager to build on this progress by focussing on carbon reduction from new developments and also from other energy saving initiatives via Merton's Climate Change strategy. Design measures introduced to address climate change will also help improve energy efficiency (see above) and energy from waste schemes can also help to reduce carbon (see below).
3. Biodiversity	Merton has a rich wealth of habitats and species that should be protected from development and climate change and enhanced where possible. The London Plan seeks improved quality of the public realm and to see the creation a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.
4. Access to nature and open space	Merton enjoys an excellent provision to open space especially existing commons and along the river Wandle but there is scope for increasing the opportunity for contact with nature and open space and improving the quality of the public realm. The creation of the Wandle Valley Regional Park within London's Green Grid will help improve access to nature and open space as well as create recreation opportunities.
5. Natural resources	There is a finite level of resources that need to be distributed over a larger population and housing level.
6. Waste	There is a need to identify new facilities to accommodate a move away from land filling waste. The adoption of the forthcoming South London Waste Plan, with its aim to divert 100% of waste from landfill, will make a major contribution to this. Managing waste sustainably via energy from waste will also contribute to mitigating against climate change and energy and carbon reduction (see above)

5 Scoping

5.1 Establishing the scope for appraisal has involved two key exercises: reviewing other relevant plans, plans and programmes and collating information about the environment, economy and social issues. Key documents that have informed this task include:

- National Planning Policy Framework (NPPF) 2012
- Strategies prepared by the Mayor of London
- Strategies prepared by London Borough of Merton
- Merton Town Centre Capacity Study 2011
- Merton Open Space Study 2010
- Merton Employment Land Study 2010
- Merton Town Centre Study update 2010
- Merton Appropriate Assessment
- Merton's affordable housing viability study 2010
- Merton dwelling conversions background paper 2009
- Merton tall buildings background paper 2009
- Wandsworth, Merton, Sutton and Croydon Level 1 Strategic Flood Risk Assessment December 2008 and Level 2 SFRA July 2009

5.2 The scope and context of the information gathered has enabled a framework of sustainability objectives to he established, 'the Sustainability Appraisal Framework'. The SA Framework provides a structure for comparing proposals and options for the DPD and is set in appendix A. The SA framework corresponds with Tasks A1, A2, A3, A4 and A5. Full details can be found in the Sites and policies DPD Sustainability Appraisal January 2012.

6 Habitats Regulations Assessment Regulation 48 Habitats Regulations Assessment of the DPD

6.1 The EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna) passed in to domestic law by ay of the Habitats Regulations (Conservation (Habitats &c) Regulations, 1994). As a consequence, any proposal that is not part of a specific management prescription that might have a significant effect on a Natural 2000 sites (also known as European sites) must be subject to Appropriate Assessment.

6.2 Regulation 48 of the Habitats Regulations responds to the provisions of Article 6 (3) and (4) of the Directive which sets out provisions for determining whether the plan is likely to have a significant effect on the integrity of a Natural 2000 Site, including Special Protection Area, Ramsar sites (Wetlands sites) and Special Areas of Conservation.

Habitats Regulations Assessment Screening

6.3 The Habitats Regulations identifies Merton Council as the Competent Authority which is responsible for deciding whether adverse effects are likely. The Council has consulted with Natural England which is the Government's advisor in this respect.

6.4 A consideration has been made of the objectives, policies and proposals of the DPD against the conservation objectives for European sites and this is provided as Appendix (D) of this SA report. Whilst, the screening process has determined that it is not likely that the DPD would lead to any adverse impact on the integrity of European sites, emerging issues have informed sustainability appraisal:

- Wimbledon Common Special Area of Conservation, 1.5km to the north west of Wimbledon town centre has been designated primarily to protect the Stag Beetle Lucanus cervus. It is also an important example of two habitats: Northern Atlantic wet health with Erica Tetralix and European dry heaths
- Richmond Park Special Area of Conservation, west of Wimbledon is also designated to protect the Stag Beetle. The Royal Park is closed every night at dusk;
- Air pollution can have an adverse impact on the habitats and/or the stag beetle;
- Recreation can have an adverse impact on the habitats and/or stag beetle.

7 Summary of influence of appraisal on the DPD

7.1 The findings of the appraisal have influence and have been used to help define the most sustainable polices in terms of where most growth will occur; the most sustainable ways in which to pursue growth in those locations; and guiding policy principles for ensuring sustainable development is at the heart of decisions relating to individual development proposals

7.2 The process of appraisal has identified priorities that need to be addressed to ensure a more sustainable approach to development and these have been incorporated into the specific proposals and policies and is the subsequent aim of Sites and policies DPD and Proposal map.

8 Monitoring

8.1 A set of indicators and targets that correspond to the sustainability objectives, are also set in the Sustainability Appraisal Report. Some of these indicators will be monitored through the Local Development Framework Annual Monitoring Report (AMR) and some will be update each time a document in the LDF evidence base is reviewed and published.

8.2 In addition, supplementary scoping reports will be prepared to inform subsequent Local Development Documents (LDD), as detailed in the LDS, although this may only cover a narrower subject area and/or a smaller geographical area depending on the LDD in question.

8.3 The indicators will be partially or informally monitored in this way, but a full update of the indicators and sustainability appraisal will be undertaken at least every five years and/or as part of the next review of the Sites and Policies DPD, whichever is the sooner.

Appraisal of development management policies

9 Background to the Development Management Policies

9.1 The development management policies give effect to the Core Planning Strategy by detailing development requirements and constraints that will contribute to the delivery of Merton's spatial strategy.

9.2 Upon adoption, the DPD will supersede the development management provisions of the Merton's Unitary Development Plan (2003). It should be noted that the London Plan (2011) includes development management provisions that does form a part of the statutory development plan for all London boroughs. Where there are such provisions, it has not been necessary to duplicate these in Merton's Sites and policies DPD and Proposal map.

9.3 In January – April 2012 the council held *planning ahead consultation preferred option* on the Sites and polices DPD and Proposal map. A sustainability appraisal report was undertaken alongside the preparation of Stage 2, and was published for consultation alongside the DPD preferred options. In addition to the policies consulted at Stage 2, the following new polices have been produced to be part of the Sites and policies DPD and Proposal map preferred options stage 2a consultation. This should be viewed as a continuation of Stage 2, not sequentially

- **DM H3 Affordable Rents:** to clarify Merton Council's policy on affordable rents following publication of the Mayor's *Early Minor Alterations to the London Plan 2011* in February 2012
- **DM H4 Demolition and rebuild**: To attain greater sustainability requirements to compensate for the inefficient use of resources and materials.
- **DM EP4 Allowable solutions:** To set out how Merton will apply emerging government policy which proposes from 2016 to allow developers to contribute to off-site energy efficiency projects instead of greater on-site efficiencies (known as "allowable solutions")

9.4 It is these new policies that are being asset in this sustainability appraisal report.

10 Sustainability Appraisal of the development management policies

10.1 A high level and robust approach to the appraisal of the development management policies has been adopted. It focuses on the principal themes into which the individual policies are arranged, protecting Merton's character and residential amenity; conservation and heritage; the environment; open space and biodiversity; housing; employment and economic development; town centres and retail development; infrastructure; community and education facilities; implementation, resources and monitoring - and how these perform against Merton's sustainability objectives.

10.2 The assessment has been carried out by council officers and the following scoring symbols are used in the tables below to identify positive and/or negative effects.

Key to Symbols Used in the Appraisal

10.3 This section of the SAR provides an account of the consideration of all proposed policies in the preferred options DPD and has been undertaken in the context of the key issues raised by other relevant documents.

Table 2: Key to Symbols Used in the Appraisal

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**

	DM H3	DM H4	DM EP4
Sustainability Objective			
1. Climate change	+	++	++
2. Renewable energy capacity	+	++	++
3. Biodiversity	+	++	+
4. Natural Resources	+	++	+
5. Waste	0	++	+
6. Water quality and resources	0	0	0
7. Flooding	0	+	+
8. Air quality	0	+	+
9. Land use	++	++	+
10. Health and well being	++	+	++
11. Poverty and social inclusion	++	0	++
12. Diversity and equality	++	0	++
13. Basic needs	++	+	++
14. Transport	+	+	0
15. Culture, leisure and social activities	+	0	+
16. Historic environment	+	0	+
17. Crime and fear of crime	+	+	0
18. Housing	++	+	+
19. Affordable housing	++	0	+
20. Education and skills	+	0	++
21. Work and the economy	+	0	++

Housing

10.4 The housing policies seek to ensure that there is adequate provision of affordable and sustainable housing in Merton to meet the needs of the local community.

10.5 **DM H3 Affordable Rents:** The policy meets a number of sustainability objectives including affordable housing, and poverty and social inclusion. The policy ensures that affordable rents are truly affordable to potential residents in Merton which will benefit those on lower incomes, those who find it hard to access housing and the wider community.

10.6 **DM H4 Demolition and rebuild**: The policy meets a large number of sustainability objectives. The policy improves the sustainability of the demolition and rebuild of a single house and, through the application of the Code for Sustainable Homes, will have a positive impact on climate change, biodiversity, natural resources, water quality and resources

Environmental Protection

10.7 **DM EP4 Allowable solutions:** The policy meets a broad number of sustainability objectives crossing environmental, social and economic objectives. The policy encourages sustainable development and ensures any carbon savings, and associated financial savings are beneficial to the local community in Merton. This policy approach will promote social inclusion by tackling social inequalities for example fuel poverty.

Appraisal of site allocations

11 Background to the site allocations

11.1 Sites allocations give effect to the Core Planning Strategy; by allocating sites for development in the borough. For sites that are suitable for waste management, the South London Waste Plan has also been subject to a sustainability appraisal.

11.2 This sustainability assessment does not therefore seek to revisit the appraisal South London Waste Plan or Core Planning Strategy, but instead focuses on the performance of the development sites and site designations against the sustainability objectives established in Merton's Sustainability Appraisal Scoping Report (2006).

12 Sustainability Appraisal of the site allocations

12.1 A 'two tier' approach to the appraisal of the site allocations has been adopted. Firstly, the assessment considers the overall performance of the policies against Merton's sustainability objectives.

12.2 Secondly, the assessment has appraised each site included in the document against the objectives. The assessment has been carried out by council officers and the following scoring symbols are used in the tables below to identify positive and/or negative effects. The results of this assessment indicate that there are a number of direct positive impacts in relation to the sustainability objectives.

12.3 In the absence of a sites allocation, development proposals on individual sites would be assessed against the relevant planning policy framework, which has been designed to deliver sustainable development. However, the site allocations provides an additional level of benefit in that it's a practical assessment and can be a proactive in identifying opportunities based on site context and community use. In addition, by engaging with landowners and developers, the site allocations can also assist delivery by pro-actively setting up an approach to site development in the early stages.

12.4 In January – April 2012 the council held *planning ahead preferred option* consultation on Sites and polices DPD and Proposal map. During this consultation a further 15 sites and one new potential development use for site 37: The Wimbledon Greyhound Stadium was put forward by the developers and landowners to be included in the Sites and polices DPD and Proposal map. It is these sites that are being assets in this sustainability appraisal report.

Appraisal of sites

12.5 As with the previous SA, sites were considered against a number of criteria. These include:

- deliverability
- existing designated uses
- environmental constraints

12.6 In some cases sites promoted for development by landowners and developers may not be included, for example, where the site is the subject of an undetermined planning application, where potential uses on the site are already set out in the Core Planning Strategy and potential development is being explored through another route or where the site already has the same established use as what is being proposed.

12.7 Pages 26-41 document the assessment of the included sites against Merton's sustainability objectives. The findings from the assessment show that the combined impact of the site allocations overall had a positive impact when assessed against Merton's sustainability objectives.

12.8 The individual objectives had a varying degree of performance both positively, negative and neutral. The performance of these individual objectives generally correlates with the appraisal of the site allocations approach.

12.9 Individual sustainability objectives that have not performed so well highlight areas where the council can develop mitigation measures, or consider a site's exclusion, at the next stage in the preparation of the site allocations, it may also identify areas for policy intervention to manage development impacts through the development management policies.

Evaluating the effects of the site allocations

12.10 The appraisal summarised indicates predominantly positive impacts arising from the site allocations approach and the sites which have been selected for inclusion in the document. This can be attributed to the Sites and policies DPD's relationship with the Core Planning Strategy, the preparation of which has also been informed by higher-level sustainability appraisal.

12.11 The site-specific elements of the appraisal are based on the approach set out for each of the sites, however this is limited by the general nature of these uses, especially open space sites, that have sought to avoid being overly prescriptive. Therefore, sustainability issues such as the detailed design of developments and their environmental performance have not been considered as this is beyond the scope of this DPD.

12.12 Although, this recognised that such aspects may have a significant bearing on the eventual sustainability outcomes of individual developments, these issues would be considered following submission of individual planning applications and assessed against

the relevant policy framework, which will have been appraised for sustainability.

12.13 Where possible constraints and negative impacts are identified, it provides the opportunity to consider how these might be mitigated. While some of the sites have been identified as having potential negative impacts in relation to particular objectives, this does not mean that overall the allocation of these sites is 'unsustainable'. In some cases measures could be implemented to mitigate potential adverse outcomes and these can be addressed through the development management process.

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

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

Site reference	**Site 37:** Wimbledon Greyhound Stadium, SW19
Current use	Grey hound stadium
Use suggested / organisation	**Stage 2a (new use proposed for consultation)–** Retain greyhound use of site with enabling development (A1 retail) Drivers Jonas Deloitte on behalf of Hume Consulting Ltd)
Council's preferred use	Intensification of sporting activity (D2 Use Class) or Industrial (B1[c], B2 Use Class) and warehousing (B8 Use Class) on cessation of a sporting use).
Site location	The site is located in the North west of the borough near the boundary with London Borough of Wandsworth. The site is made up of two thirds greyhound racing stadium and the remainder of the site is a car park. Surrounding the site along the northern and eastern boundary the site adjoins an industrial estate. To the south of the site in Merton, at the other side of Plough Lane is an industrial estate. Running along the western boundary of the site is a large electricity substation. The site and its surrounds are within Flood Zone 3b. Most of the site is within a critical drainage area for surface water flooding

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Suggested use	-	+	-	-	-	-	-	-	+	+	+	+	+	--	++	0	0	-	-	+	+
Councils preferred use	+	+	-	-	-	-	-	-	+	+	+	+	+	-	++	0	0	-	-	+	++

SA Comments: The Sustainability Objectives score favourably for industrial/warehouse and/or possible sport leisure activity due to the site being located within flood zone 3b. Any appropriate development proposal must ensure the protection of residential and commercial amenities of properties adjacent to or in the vicinity of the site and incorporate secure by design principles. Any development proposal must incorporate mitigation measures regarding to flooding issues (from all source including critical drainage and surface water), parking, traffic and road safety impacts on neighbouring streets.

Site reference	**Site :** 12A Ravensbury Terrace, Wimbledon Park, SW18 4RL
Current use	Office Use/ Vacant Warehouse Use
Use suggested / organisation	Residential (C3 Use Class) and Office (B1[a] Use Class) – Planning Potential (consultants) representing M. Stone (site owner)
Council's preferred use	Office and residential
Site location	The site is situated toward the northern borough boundary with Wandsworth and is adjacent to the River Wandle and to the railway line to the east. Immediately to the south of the site is 12 Ravensbury Terrace, a three storey building which has recently been renovated and is occupied by creative businesses which include an architecture firm. Further south is a neighbouring site proposal, Haslemere industrial area at 20 Ravensbury Terrace. The site is within 5mins walk to Earlsfield station which is situated less than 400m north□east of the site. West of the site is predominantly small residential terraces. To the east of the site is the River Wandle and railway.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	-	-	-	-	-	0	+	+	++	++	++	0	0	0	-	+	+	+	++
Councils preferred use	0	0	-	-	-	-	-	0	+	+	++	++	++	0	0	0	-	+	+	+	++

SA Comments: The Sustainability Objectives score favourably for a mixed development use office led/ residential development. This approach will ensure an economical (employment) and social (residential) balance in the area. Any proposal must be sensitive and respectful to the residential and commercial amenities of properties adjacent to or in the vicinity of the site and incorporate secure by design principles. Furthermore, any appropriate development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain to minimise flood risk for future occupiers and the potential for water pollution from the site; and parking, traffic and road safety impacts on neighbouring streets

Site reference	**Site 65:** Kenley Road Car Park , Adjacent Kendor Gardens, Kenley Road, Merton Park SW19 3HZ
Current use	Commuter car park
Use suggested / organisation	Residential London Borough of Merton
Council's preferred use	Residential (C3 use class) to be developed in conjunction with the MoreMorden masterplan
Site location	This site is a pay and display car park with approximately 120 vehicle spaces, which are predominately used by commuters utilising Morden Tube Station. The site is generally rectangular in shape. To the immediate west of the site is a linear park above the northern line tube, to the north and east are 2 storey residential terraces, and to the immediate south is a three storey residential apartment building. The surrounds of the site can be generally characterised as residential

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	0	0	-	0	-	0	+	++	++	++	++	0	+	0	0	+	+	+	+
Councils preferred use	0	0	0	0	-	0	-	0	+	++	++	++	++	0	+	0	0	+	+	+	+

SA Comments: The Sustainability Objectives score favourably for residential due to the location of the site and surrounding area. It is imperative that any appropriate development must be sensitive and respectful to adjacent open space, residential and commercial amenities of properties adjacent to or in the vicinity of the site. Furthermore, incorporate flooding (from all sources), parking, and traffic; and road safety mitigation measures with any proposal.

Site reference	**Site 69:** Sibthorp Road Car Park Car Park, Sibthorp Road, Mitcham, Surrey, CR4 3NN
Current use	Car park
Use suggested / organisation	Town centre uses and residential / London Borough of Merton
Council's preferred use	Restaurant / café and residential
Site location	The site is within Mitcham town centre and within an Archaeological Priority Zone. South east of the site is susceptible to surface water flooding. The site is irregular in shape, is adjacent a busy main road and is occupied by parking spaces for approximately 50 vehicles, public conveniences and a community recycling disposal area. Access to the site is via a drive entry along the north-west boundary from Holborn Way with egress along the south west boundary. There are two points of pedestrian access to the site from London Road via Sibthorp Road and from the Mitcham Fair Green via a passage adjacent the King's Arms Pub. The site is surrounded by business uses which generally address the pedestrianised section of London Road to the east or Upper Green West to the south; however there are also several businesses which have oriented shop fronts toward the frontage of the car park. To the west of the site on the opposite side of Holborn Road are large 4 -5 storey residential apartment buildings at Sadlers Close.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	0	0	-	0	-	0	+	++	++	++	++	0	+	-	0	++	+	+	++
Councils preferred use	0	0	0	0	-	0	-	0	+	++	++	++	++	0	+	-	0	++	+	+	++

SA Comments: The Sustainability Objectives score favourably for a residential led mixed use. This approach will ensure an economical (employment) and social (residential) balance in the area. Any proposal must consider the adjacent heavy vehicular traffic along Holborn Way and therefore should seek to mitigate against noise pollution for its occupiers. Furthermore, any appropriate development proposals will need to incorporate suitable mitigation measures to address the flooding issues (from all sources) to minimise flood risk for future occupiers, parking, traffic and road safety impacts on neighbouring streets and be sensitive to environmental character of the area.

Site reference	**Site 70:** Haslemere Industrial Estate, 20 Ravensbury Terrace, Wimbledon Park, SW18
Current use	Business and industrial
Use suggested / organisation	Alternative uses on the site (such as residential) - Jones Lang LaSalle on behalf of Astranta Asset Management
Council's preferred use	Business / Light Industrial (B1)
Site location	The site is situated toward the northern borough boundary with Wandsworth and is adjacent to the River Wandle and to the railway line to the east. The site has a mixture of purpose built industrial units and provides vehicular access to the adjoining Rufus Business Estate to the south. The site is within 5mins walk to Earlsfield station which is situated less than 400m north east of the site. Immediately to the north of the site is 12 Ravensbury Terrace, a three storey building which has recently been renovated and is occupied by creative businesses which include an architecture firm. Further north is a neighbouring site proposal, 12A Ravensbury Terrace. West of the site is predominantly small residential terraces. To the east of the site is the River Wandle and railway.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	0	-	-	-	-	0	+	+	++	++	++	-	+	0	0	++	+	+	+
Councils preferred use	0	0	0	-	-	-	-	-	+	+	++	++	++	0	0	0	0	0	0	+	++

SA Comments: The Sustainability Objectives score favourably for light industrial or light industrial re-development. This development approach is the most appropriate and sustainable for this employment area and surrounding industrial estate, providing development proposal incorporate suitable mitigation measures to address the issues associated with the functional floodplain to minimise flood risk for future occupiers and the potential for water pollution from the site. Any development must be sympathetic to archaeological heritage in the area.

Site reference	**Site 71:** Land on Corner of Weir Road/Durnsford Road (Homebase and Vantage House, 1 Weir Road, Wimbledon, SW19 8UG)
Current use	Offices partly vacant, Homebase retail unit, associated car parking, electricity sub stations
Use suggested / organisation	Hotel, A3 Use, residential -Blue Sky Planning on behalf of LaSalle Investment Management
Council's preferred use	Industrial and warehousing (B1b, B1c, B2, B8)
Site location	The site is currently occupied by a bulky retail unit (Homebase), a 4 storey office building with undercroft parking, and large electrical transformer building and open parking which straddles various level changes across the site. Vehicular access to the site is obtained via driveway entries from Weir Road along the southern boundary and the north-eastern boundary. To the north-west of the site are business units on large tracts of land. To the east of the site is a waste management facility, to the south of the site are the 4 storey residential apartment buildings at Plough Lane and the west of the site on the opposite side of Durnsford Road are 2 storey residential terraces.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	-	-	-	-	0	-	+	0	++	++	++	-	+	0	0	+	+	0	+
Councils preferred use	0	0	-	-	+	-	0	-	+	0	++	++	+	+	+	0	0	0	0	+	++

SA Comments: The sustainability objectives score favourably for industrial use at this site, due to the employment site location and current surrounding employment uses. .Any development proposal must ensure that consideration to current location of the electrical transformer is addressed and any proposal must not compromise the entrance to Weir Road for vehicle movements associated with its Strategic Industrial Location. In addition, any appropriate development proposals will need to incorporate suitable mitigation measures to address the flooding issues (from all sources), parking, traffic and road safety impacts on neighbouring streets,

Site reference	**Site 72:** Wolfson Centre site on Copse Hill Wolfson Rehabilitation, Copse Hill, West Wimbledon, SW20 0NJ
Current use	St George's Healthcare NHS Trust as a Neuro rehabilitation Centre
Use suggested / organisation	Residential -Indigo Planning on behalf of Berkeley Homes
Council's preferred use	Residential
Site location	The site consists of a single storey 1970's building which was last used as a health care centre. It is currently being utilised as a site office associated with the redevelopment of Atkinson Morley and the Firs for residential purposes. Residential developments are currently being built to the east and west of the subject site, large detached houses are situated to the north of the subject site, and open space to the south

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	+	0	+	+	-	+	0	0	+	++	++	++	++	0	++	+	0	++	+	+	+
Councils preferred use	+	+	+	+	-	+	0	0	+	++	++	++	++	0	++	+	0	++	+	+	+

SA Comments: The sustainability objectives score favourably for appropriate residential development. This approach will ensure housing needs are met within the borough. It is important that any appropriate development needs to be sensitive and respectful to Metropolitan Open Land to the south of the site, enhance the character of the conservation area and be sensitive to biodiversity needs of the site and surrounding area.

Site reference	**Site 73***:* Dreams Bed Superstore, 121-125 London Road, Mitcham, CR4 2JA
Current use	Retail warehouse – restricted to bulky goods (Class A1)
Use suggested / organisation	Retail (Class A1) -Planning Potential on behalf of GBRE Global Investors
Council's preferred use	Mixed use – residential (C3 and limited retail/ community use)
Site location	The site is situated on a busy road, with vehicular access from London Road. The site contains a large two storey retail warehouse building which is utilised for the purpose of selling bulky furniture to the public and provides a forecourt for approximately 15-20 cars. The northern boundary of the site adjoins a number of sites, and includes a recently completed 4 storey mixed use building, 2 storey Blenheim business units and 2 storey residential terraces. The southern boundary of the site adjoins different uses including neighbouring site proposal currently utilised as a pay and display car park (Elm Nursery Car Park), two storey residential terraces and four storey residential flats beyond. To the west, on the opposite side of London Road, is a part 3, part 4 storey residential apartment building, a single storey garden centre, two storey hardware store and a recently completed 4 storey mixed use development.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	+	0	0	0	-	0	0	-	+	0	0	+	+	--	0	0	0	-	-	+	++
Councils preferred use	+	0	0	0	-	0	0	-	+	+	+	+	++	+	0	0	0	++	+	+	+

SA Comments: The sustainability objectives score favourably for mixed use residential/retail/ community use. This approach will ensure a more sustainable economical (employment) and social (residential /community) balance in the area meeting the local needs of the area. Any appropriate development must not adversely impact on archaeological heritage in the area; have mitigating measures to address potential parking, traffic and safety impacts on neighbouring streets and local amenity.

Site reference	**Site 74:** Southey Bowling Club, 559 Kingston Road, Raynes Park, SW20 8SF
Current use	Bowls Club
Use suggested / organisation	Residential and Bowls Club or residential - Kossway Ltd on behalf of Southey Bowls Club
Council's preferred use	Bowls club / residential
Site location	The site whilst irregular in shape is well proportioned. It is currently occupied by a bowling green with associated single storey timber structures to the east of the site. The western part of the site is occupied by an open hard standing car park for approximately 35 cars. A single storey brick clubhouse lies in the westernmost corner of the site. Vehicular access to the site is via a long narrow driveway entry from Lower Downs Road. The gardens of two storey residential developments surround the site on all sides.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	0	0	0	0	0	0	+	+	+	+	+	0	+	0	0	+	+	+	+
Councils preferred use	0	0	0	0	0	0	0	0	+	+	+	+	+	0	+	0	0	+	+	+	+

SA Comments: The sustainability objectives score favourably for the existing use bowling club with some residential as highlighted by sustainability objectives 10 (health and well being) and 15 (Culture, leisure and social activities). This development approach balances the objective 15 and 10 with the housing needs for the borough. Therefore, it is important that any potential development proposal should ensure that there is no loss of sporting facilities for which there is demand. Furthermore, any development proposal will need to ensure that privacy to surrounding residential amenity is considered and mitigating measure relating to parking, traffic and road safety impacts on neighbouring streets and local amenity are also considered.

Site reference	**Site 75:** Former Mitcham Gasworks- 49 Seagas House, Western Road, Mitcham, CR4 3ED
Current use	Vacant. Last used as regional offices for the National Grid. The site has outline planning permission for a major residential employment scheme
Use suggested / organisation	Residential and retail (convenience) - Drivers Jonas Deloitte on behalf of Nation Grid.
Council's preferred use	Proposed uses will be dependent on the decommissioning of the gasholder. If the gasholder is decommissioned, it is recommended that site redevelopment is taken forward through the preparation of a planning brief (supplementary planning document) to clarify the proposed uses, address the layout, design, essential infrastructure requirements (including school places) and other unique issues associated with this site.
Site location	The site has been cleared with the exception of a large gas holder in the northern corner of the site. Access to the site is via a driveway entry from Western Road, a reasonably busy road which connects the site with Mitcham Town Centre. To the north of the site is a large retail warehouse currently under redevelopment for purpose of a supermarket, to the west and east are two storey residential dwellings, whilst to the south is the excluded part of the gasholder site beyond which are 3 storey residential apartment buildings and a medical centre.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	0	0	-	0	0	0	+	+	++	++	+	+	0	0	0	+	+	+	+
Councils preferred use	0	0	0	0	-	0	0	0	+	++	++	++	+	+	0	0	0	++	+	+	+

SA Comments: The sustainability objectives score favourably for residential due to its location adjacent to Mitcham town centre boundary but within in walking distance of the town centre uses. However, due to the former use of the site any development within the vicinity of the gasholder is subject to restrictions set out in the HSE's land use planning methodology (PADHI), which limits the potential for residential led mixed use development at present. If the gasholder is decommissioned and the site decontaminated and cleared, this will remove any HSE restriction on use, function and layout of the site.

Site reference	**Site 76:** 2 South Garden Jamia Ahmadiyya, 2 South Gardens, Colliers Wood, SW19 2NT
Current use	Residential School
Use suggested / organisation	Residential - AMA UK
Council's preferred use	Education (Use class D1, C2)
Site location	The site is currently occupied by a grade II listed building which accommodates a private school with 2 temporary modular buildings and parking for approximately 14 cars. Vehicular access is obtained via a driveway entrance from South Gardens. Adjoining the east of the site is Singlegate Primary School, which is currently being expanded to accommodate additional entrants. To the west is a large 18 storey office tower with currently unimplemented planning permission for residential development. To the south and north are 2 storey residential terraces. The site is within close proximity to Colliers Wood underground station, priory retail park and a retail neighbourhood parade along Christchurch Road.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Use suggested	0	0	0	0	-	0	-	0	+	+	++	++	++	0	0	0	0	+	+	+	+
Councils preferred use	0	0	0	0	0	0	0	0	+	++	++	++	++	0	+	+	0	0	0	++	+

SA Comments: The sustainability objectives score favourably for an educational use at this site. Providing however, any potential development proposal incorporate mitigating measures for flooding (from all source including critical drainage), must be sensitive and respectful to the grade II listing of the building and will need to ensure there is no adverse environmental (heritage) and social (culture, leisure and activities) impact to the building and surrounding area for local residents.

Site reference	**Site 77:** Raynes Park Service Station, 26 Bushey Road, Raynes Park, SW20 8LW
Current use	Vehicle repair, maintenance, sales and valet
Use suggested / organisation	Residential -Kingsley Nicholas & Ward on behalf of Rightway Corporation Limited
Council's preferred use	Residential
Site location	The site is long and narrow, with a single point of entry from Bushey Road. The site contains a disused service station toward the Bushey Road entrance which is currently being utilised as a hand car wash. The site is generally surrounded on both eastern and western boundaries by the rear gardens of two storey residential properties. To the north of the site is a long narrow warehouse utilised as an image processing and data storage facility accessed via Kingston Road. To the south of the site on the opposite side of Bushey Road is a place of worship, and a parade of retail shops with residential dwellings above.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Residential Use	0	0	0	0	-	0	-	+	+	+	+	+	+	0	0	-	0	++	+	+	+

SA Comments The sustainability objectives score favourably for residential due to the site location and surrounding area as the most appropriate sustainable development for this site. However, before any development to this site the decommissioning of the petrol station is paramount and remediation measures will need to be investigated following decommission of the former petrol station use. Any development proposal will need to incorporate mitigating measure for flooding (from all sources including surface water and critical drainage) and for the potential parking, traffic and safety impacts on neighbouring streets and local amenity.

Site reference	**Site 78**: 19 1-193 Western Road, Mitcham, CR4 3ED.
Current use	Factory and open storage
Use suggested / organisation	Residential – James Davies
Council's preferred use	Residential
Site location	The site is situated on the southern side of Western Road, which is a busy arterial thoroughfare. The site is currently occupied by a warehouse building and hard-standing parking area. Sole access to the open yard adjoining the west of the site is through the site. The subject site is surrounded by two storey residential properties to the south, east and west and also provides access to an adjacent open yard business to the south west. To the north of the site on the opposite side of Western Road is a scattered large industrial site occupied by Blackout, a blinds and rigging company.

Suggested Use option	**Sustainability Objectives**																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Residential Use	0	0	0	0	-	0	0	-	+	+	+	+	++	0	0	-	0	++	+	+	+

SA Comments: The sustainability objectives score favourably for residential due to the site location and surrounding area as the most appropriate sustainable development for this site. However, for any potential development to be sustainable it must ensure there is no adverse potential impact on archaeological heritage protected species, biodiversity and the adjacent green corridor, incorporate suitable mitigation measures to address the issues associated with the functional floodplain and flooding from all sources (including surface water and critical drainage) minimise flood risk for future occupiers and the potential for water pollution from the site and mitigating measure for the potential parking, traffic and safety impacts on neighbouring streets and local amenity.

Site reference	**Site 80:** Crusoe Road Industrial Buildings 45A and B, Crusoe Road, Mitcham, CR4 3LJ
Current use	Light Industrial
Use suggested / organisation	Residential/ or compatible use – Councillors Draper and Attawar
Council's preferred use	Residential
Site location	The site is occupied by single storey commercial buildings, and has small concrete forecourt which is informally utilised for loading and parking associated with the businesses. The adjoining site to the west contains a vacant two storey industrial building (neighbouring site proposal 18), whilst the general character of the surrounding area comprises standard two storey residential terraces.

Suggested Use option	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Residential Use	0	0	0	0	-	0	0	0	+	+	+	++	++	0	0	-	0	++	+	+	+

SA Comments: The sustainability objectives score favourably for residential due to the site location and surrounding area as the most appropriate sustainable development for this site. Any appropriate development proposal must incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area and potential parking, road safety and traffic impacts on neighbouring streets and local amenity. This development approach will ensure there is no adverse impact to the local environment and for the local residents.

Site reference	**Site 81:** Moats Pollards Hill Housing Estate
Current use	Residential housing estate (use class C3), open space, library and community uses (use classes D1 and D2).
Use suggested / organisation	Residential (use C3), supported housing and care homes (use C2), Office (B1) and Community (D1): Savills on behalf of Moat Homes Ltd.
Council's preferred use	Redevelopment proposals should be delivered via a masterplan (supplementary planning document) for the site which involves the local community in the potential uses and design for the area
Site location	The site comprises a collection of three storey attached homes many with garages on the ground floor, Pollards Hill library, Pollards Hill youth centre and community day centre arranged around large open spaces. The character of the surrounding area can generally be described as residential however there are primary and secondary schools situated to the north west of the site and a small retail neighbourhood parade to the south west along South Lodge Avenue.
SA Comments: Any development for this site is recommended to be done as a masterplan thus ensuring that existing community services are protected and enhanced or redeveloped. Any large scale sustainable redevelopment plans for the site will need to have mitigating measures for flooding (from all sources) traffic and parking, open space, noise and air pollution. Any re-development/development on this site is a great opportunity to address many social and economical deprivation issues in this area and must be a consideration with any development proposals. Therefore, an assessment has not been carried out at this stage as one would need to be carried out as part of the development of a masterplan.	

13 Conclusion

13.1 As part of the sustainability appraisal it is necessary to identify key sustainability issues. The Sites and policies DPD, and Proposal map and have the opportunity to take forward area specific proposals in a manner that maximises the benefits to sustainability and avoids adverse impacts.

13.2 The areas selected as the focus for economic growth and stability is inherently the most sustainable, based on a network of centres being well connected by public transport that supports sustainable modes of travel.

13.3 It is essential that a balance is always sought in terms of housing, employment, leisure and community activities, including open space and the natural environment. This balance must be appropriate to reinforce sustainability and improve quality of life. All redevelopment proposals should take the opportunity to improve the physical environment and minimise the risks associated with a changing climate.

13.4 Issue such as flood risk, income deprivation, community provision and health provision are areas of concern within the borough and it is fundamental that any potential development address these issues.