Health Impact Assessment for the Submission Local Plan

November 2021

1. Introduction

1.1 This Health Impact Assessment (HIA) assesses the potential health and wellbeing impacts of the new Local Plan. Guided by the London Healthy Urban Design Unit (HUDU) Rapid Health Impact Assessment tool and the Healthy Urban Planning Checklist. The planning policy team with input from Merton Public Health has carried out this HIA.

2. What is the purpose of Health Impact Assessments (HIA)?

2.1 The World Health Organization (WHO) defines an HIA as a combination of process and methods used by those planning, deciding, and shaping changes to the environment to evaluate the significance of health effects of a plan or project. An HIA helps decision-makers in local authorities and other stakeholders make choices and actions to best, prevent ill health, promote good health and reduce health inequalities. When applied in the planning system, an HIA puts people's health and wellbeing at the heart of the process.

2.2 The National Planning Policy Framework (NPPF) sets out the government's planning policies and, how they, should be, applied. It requires planning policies and decisions to *"enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs"*. It also emphasises that the level of detailed supporting information provided to local authorities should be relevant, necessary and material, and that having the right information is crucial to good decision-making. The supporting national Planning Policy Guidance (PPG), healthy and safe communities' chapter, suggests the use of HIA can be beneficial "where there are expected to be significant impacts"

3. Health and wellbeing

What is a healthy person?

3.1 A healthy person has been defined by the Health Foundation as 'not as someone free from disease but as someone with the opportunity for meaningful work, secure housing, stable relationships, high self-esteem and healthy habits.' This highlights the importance of factors in our environment and the impact they have on our wellbeing and health, rather than

focusing on a bio-medical model of health. Therefore, planning has a significant role to play in improving the public's health and wellbeing.

What is a healthy community?

3.2   A healthy community is a good place to grow up and grow old in. It is one, which promotes healthy behaviours and supports reductions in health inequalities. It should enhance, improve and support physical and mental health of the community.

Active healthy lifestyles - made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing; and is accessible by walking, cycling and public transport.

The creation of healthy living environments for people of all ages – its supports social interaction, from children and young people by way of play and exploring for example through accessible and safe blue and green infrastructure. Making our town centres adaptable and accessible by way of layout and design for our elderly population and the increase of people living with dementia and other sensory or mobility impairment

What are the wider determinants of health?

3.3   The health and wellbeing of people and communities is influenced by, a wide range of factors, the majority of which lie outside of the health service. These are the wider determinants of health.

Figure 1: Determinants of health and wellbeing in our neighbourhoods (Barton and Grant based on Dahlgren and Whitehead)
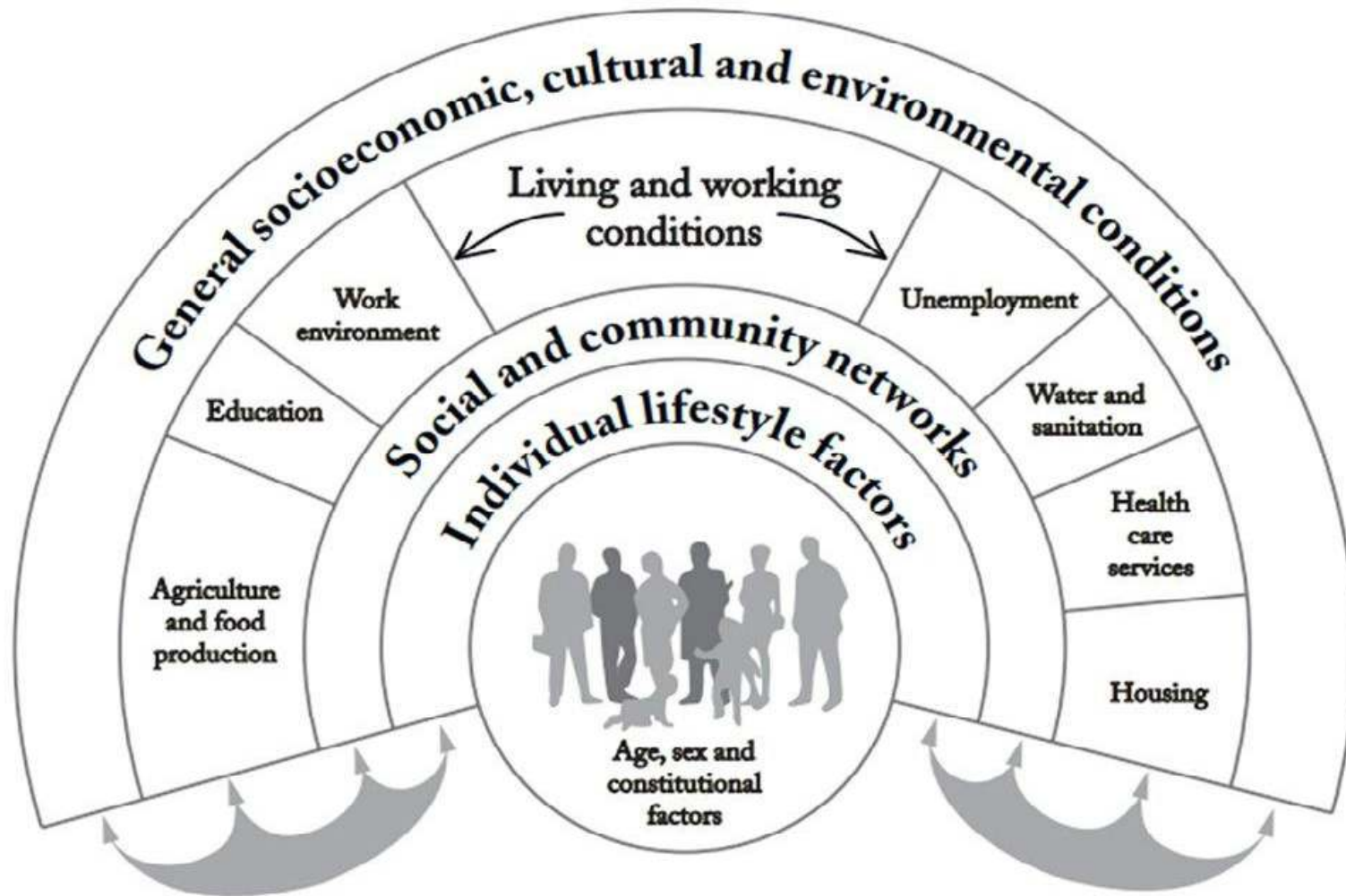
3.4   The last 18 months have seen challenges to population health that are unprecedented in recent decades and have brought inequalities into sharp focus. The Coronavirus pandemic (COVID-19 has likely worsened the pre-existing health inequalities in Merton, both through its direct impact on illness and death, but also through its indirect impact on the wider determinants of health.

3.5   COVID-19 will have significant medium- and long-term health, social and economic impacts on our communities, with some population groups affected disproportionately. Emerging concerns for health include the impact on people living with chronic and long-term health conditions (e.g. diabetes, obesity and respiratory conditions) who may be at increased risk of complications from COVID-19 and increased risk of death. It may also worsen social isolation, loneliness, and mental illness. An economic downturn because of COVID-19 will have long-term impacts on health and wellbeing.

3.6   It is widely recognised that there is an important link between how places are, planned and developed can, have an impact on health (including mental health) and wellbeing. This link is, recognised in the planning system. In developing the Local Plan, the Council has taken account of social, economic and environmental issues in Merton. However, the links between environment, health and health inequalities cannot always, be fully addressed by the planning system. Nevertheless, this does not mean the planning system does not have a role to play.

3.7   Housing is a significant social determinant of health and poor housing adds to the hardship of the COVID-19 crisis. The pandemic has highlighted inequalities in housing and the consequences for health and wellbeing. People living in overcrowded or multi-generational homes may be at greater risk of contracting and falling ill from Covid. Increased time spent at home and a lack of access to outdoor space (particularly for those in the private rented sector), may worsen health impacts. There is an increased risk of people becoming homeless or falling into debt due to an inability to pay rent. The pandemic has highlighted the importance of suitable housing and the need to consider availability and provision of social rented and intermediate housing.

3.8   Changes in how residents use and access green spaces and interact with the public realm during the pandemic. The way we move around has changed due to the need to social distance has meant a shift to more active and sustainable travel modes. There may also be longer-term implications in the design of 'healthy places and neighbourhoods,' including the need to consider spatial inequalities, the use of indoor and outdoor space and town centre design. The impact of Covid on the environment and climate change, especially in terms of energy consumption and air quality pollution, is unknown but is likely to fluctuate.

4.   Merton's new Local Plan

4.1   The aim of the new Local Plan is to plan how the borough will develop, look and grow. It will help the Council to deliver wider improvements for the borough for years to come and support the Coronavirus (COVID-19) pandemic recovery. In developing the new Local Plan, the Council has engaged with the Merton residents, stakeholders and partners including health providers (for example National Health Service), environmental bodies/groups, sporting governing bodies and businesses. At the centre of the Local Plan is addressing climate change, improving health and wellbeing and reducing growing inequalities, this aligns with the Mayor of London Good Growth Objectives, set out in the London Plan. Additionally, it looks to deliver wider improvements for the borough including delivering much needed genuine affordable homes, creating job and training opportunities, building resilience and strengthening growth of our town centres and areas of deprivation, protect, enhancing and improve access to our green and blue infrastructure.

4.2   The Local Plan has been informed and influence by several health plans/strategies for example (not an exhaustive list):

- Merton's Joint Strategic Needs Assessment (JSNA): looks at the current and future health and care needs of local populations to inform and guide the planning and commissioning (buying) of health, wellbeing and social care services within a local authority area.
- The Merton Story: is part of the JSNA, it an annual snapshot of what Merton is like as a place to live, the key risk factors for health and wellbeing through the life course, and important health outcomes and health inequalities that exist between different population groups, as identified through the ongoing JSNA process.
- Merton's Health and Wellbeing Strategy 2019-24: seeks to ensure key partners work together to make Merton a healthy place by creating the physical and social conditions for all people to thrive, and to complement the provision of holistic health and care services. Its seeks that we all start well, live well, age well in a healthy place
- Ward Health Profiles: produced by Merton Public Health the profiles give a brief health and well-being snap shoot of wards in Merton
- Annual Public Health reports
- Suicide Prevention Framework 2018 - 2023: provides a working framework for Merton's suicide prevention plans for 2018 to 2023. Developed with a range of stakeholders who have all provided insight and steered the development of

the Framework. It outlines key issues and highlights the outcomes we wish to achieve over the duration of the plan.   Our vision is for a zero-suicide borough where no suicide is inevitable.

4.3   A key document that has influence the Local Plan is Merton's Community Plan (2020-26). It sets out the Merton Partnership's long-term ambitions for the borough and the overall direction and priorities that the partnership will focus on. It sets out the key priorities that the members of the Merton Partnership want to work on together. The overarching priority for the Community Plan is to increase community participation in Merton as a driver to improving resilience and wellbeing, focussing on those parts of the borough with the poorest outcomes. It highlights how adopting a collective approach can help to better, achieve the ambitions of the people who live and work in the borough.

4.4   In addition, it sets out actions for how partners can work collectively with our communities to deliver the priorities. This includes identifying and highlighting the assets in our communities, both physical spaces, as well as people and groups with skills and knowledge that can help strengthen and grow community-led activities.

4.5   Each of the Merton Partnership's four Thematic Networks proposed eight thematic priorities. These are not entirely new priorities, but are, based on the most recent strategies agreed by each Thematic Network.
- Reducing carbon emissions to tackle climate change
- Protecting and enhancing the local environment
- Tackling diabetes and creating a healthy place
- Creating Healthy Workplaces across Merton
- Reducing serious violence
- Enforcing action against anti-social behaviour
- Getting involved and having a say – promoting the voice of children and young people
- Making Merton a place where children and young people feel they belong and thrive

4.6   The Local Plan has embedded the Community Plan thematic priorities throughout the plan where, the planning system has a role to play and can assist.

5.   The Local Plan and HIA's

5.1   The Local Plan recognises the value of HIAs and the role they can play in shaping development proposals by promoting sustainable developments that support the creation of strong, vibrant and healthy communities. The Local Plan states that HIAs are designed *'consider whether a development proposal might reinforce health inequalities and inadvertently damage people's health or have positive health outcomes for the local community*. Furthermore, it says that HIAs should be '*carried out during the implementation stage to avoid the risk of retrofitting health sensitive solutions a proposal, which is likely to generate higher development costs and affect the financial viability of the development'.*

5.2   Policy HW10.2 (b) sets out the Councils criteria for when a HIA must be, submitted with the planning application.

(Policy extract)
   ii.   Require all developments in Merton of 100+ residential units or over 10,000m2 non-residential development to carry out a Health Impact Assessment (HIA).
   iii.   Require a HIA for developments of over 50 homes in areas identified by the Ministry of Housing, Communities and Local Government (MHCLG) Indices of Deprivation or identified in Merton's Joint Strategic Needs Assessment (JSNA) as an area of health priorities.
   iv.   Require a HIA for the following developments:
   - Cumulative impact - proposed development is in an area with two or more other major developments planned or started.
   - Significant developments in areas of poor air quality, for example Air Quality Focus Areas
   - If, 1 or more hot foods takeaways are proposed.
   - New educational, health facilities or publicly accessible open space are proposed.

6.   The Local Plan urban objectives and spatial vision

6.1   The five Strategic Objectives apply to the whole of Merton and provide a framework for the Local Plan, acting as steppingstones to deliver the Spatial Vision. Consultation responses, Merton's Community Plan and the London Plan (2021) have guided Merton's strategic objectives.

Strategic objective 1: tackling climate change - To make Merton an exemplary borough in mitigating and adapting to climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.

6.2   Tackling the causes of climate change and its effects – Merton has adopted a Climate Change Strategy and Action Plan in 2020. The Local Plan has made tackling the causes of climate change and managing its effects one of the key strategic priorities and it is now, embedded throughout the plan.

Strategic objective 2: supporting resilience - To support those who live, work and study in Merton in resilience and recovery, to create the conditions for growth and to direct the benefits of this growth so it best meets the needs of Merton's communities.

6.3   Recovery and resilience following Coronavirus pandemic is changing the way we live our lives: where and how we want to work, shop, socialise, live and travel. Enabling more active and healthier lifestyle of our residents and improve health inequalities in Merton. Covid-19 has also had a devastating effect on local businesses and jobs and has rapidly accelerated changes to our high streets that had already started pre-2020. Together with other council strategies, projects and investments, the Local Plan is supportive of measures to embed recovery and improve the borough's resilience.

Strategic Objective 3: places for people - To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space.

6.4   This objective ensures Merton can meet its needs for new homes, including genuine affordable homes, of the types and sizes for different households is a key part of Merton's Local Plan. This will be coupled by working with the voluntary sector,

businesses, the National Health Services (NHS), Metropolitan Police Service, Transport for London and other partners to deliver social and community services, both by providing new infrastructure and repurposing under-used spaces. Other Council strategies and projects – such as the emerging Housing Strategy and the Neighbourhood Fund for community infrastructure levy – contribute to this objective.

Strategic objective 4: good growth - To create the conditions for growth, ensuring it takes place in the most appropriate and sustainable locations, minimises the impacts of development, and to direct the benefits of this growth so it meets the needs of Merton's communities for homes, jobs, services and preserves and enhances the borough's unique character and appearance.

6.5   The Council wants to create the conditions for growth that helps with economic recovery and one of the Local Plan's objectives is ensuring it takes place in the most appropriate and sustainable locations. The Council also wants to guide the benefits of this growth to meets the needs of Merton's communities and enhances the borough's unique character and appearance, thus achieving positive social, environmental and quality of life objectives as well.

Strategic objective 5: place plans and the 20-minute neighbourhood: To promote a high quality urban and suburban environment in Merton, providing reliable, quality local services in accessible, well-designed neighbourhoods.

6.6   Promoting healthy streets through boosting local businesses and high streets, reducing pollution (including air pollution), supporting, enabling walking, and cycling will all help to create a local neighbourhood where residents can access the services, they need within 20 minutes of their home. The new Local Plan will draw these considerations into planning decisions.

The Spatial Vision of the Local Plan by 2036 Merton will:

- Be on our way towards becoming net-zero carbon by 2050 in partnership with other organisations and importantly with our residents:
- Continue to grow the borough's low carbon and circular economy.
- Have minimised greenhouse gas emissions and ensured resilience overheating, flooding and other the impacts of climate change.
- Reduced health and income inequality within the borough and the disparities between the east and west of the borough.
- Provided new homes meeting the needs of communities - especially more affordable homes for households on the council's waiting list.
- Created attractive safe and secure 20-minute neighbourhoods to live, work, and socialise.
- Created new and improved existing neighbourhoods with a range of mix tenure homes while respecting the local character of each area.
- Improved air quality, minimise noise, flood risk and other polluting impacts, and reduce carbon and water demands by minimising detrimental impacts from development.
- Improved access to our unique rich heritage and historic environment, for all, while encouraging innovations in building technology and improving sense of
- Achieved a shift in travel behaviour towards more people walking and cycling, particularly for short journeys.
- Improved interchange between transport modes and incorporating innovative solutions to manage deliveries and the highway network for all users.
- Continue to develop sustainable growth across the Merton and in our growth areas, for all.

7. Local Plan incorporated approaches

7.1 Throughout the Local Plan several credited and established design and planning approaches have been adopted which, look to improve health (including mental health) and wellbeing, reduce health inequalities, enable behaviour changes, create healthy and inclusive environments, support COVID-19 recovery, strengthen and support resilience.

7.2 The Local Plan is guided by National Planning Framework) and its supporting documents, the London Plan and its supporting guidance, published guidance from health bodies for example Public Health England and planning and design professional bodies/organisations for example the Royal Town Planning Institute (RTPI), Town and Country Planning Association (TCPA) and Design Council. Some of the approaches incorporated in the Local Plan include the following:

7.3 **20 Minute neighbourhood** is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day – shopping, school, community and healthcare facilities, places of work, green spaces and more. 20-minute neighbourhood will be, based on what the local diverse community (including children and young people, ethnic minorities and disabled people) want for their neighbourhoods.

7.4 However, the following characteristics, or 'ingredients', are likely to be part of the mix:

- Diverse and affordable homes
- Well-connected paths, streets and spaces
- Schools at the heart of communities
- Good green spaces in the right places
- Local food growing
- Keeping jobs and money local
- Community health and wellbeing facilities
- A place for all.

Figure 2: Town and Country Planning Association (TCPA) 20 Minutes Neighbourhood feature

Features of a 20-minute neighbourhood

Diverse and affordable homes

Well connected paths, streets, and spaces

A place for all ages

Schools at the heart of communities

Community health and wellbeing facilities

Good green spaces in the right places

Keeping jobs and money local

Local food production

7.5 Sport England's Active Design 10 principles and guides are already, embedded within overlapping disciplines related to open space and landscape, transport, access and design and layout. The Active Design principles cover:

- Activity for all neighbourhoods
- Walkable communities
- Connected walking and cycling routes
- Co-location of community facilities
- Network of multifunctional open space
- High quality streets and spaces

- Appropriate infrastructure
- Active buildings
- Management, maintenance, monitoring and evaluation
- Activity promotion and local champions

7.6 The principles have been, developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

7.7 Transport for London Healthy Streets Approach help create a vibrant, successful city where people can live active, healthy lives. The Healthy Streets Approach looks to make our neighbourhoods a healthier, more sustainable, safer and more connected. The easiest way for most of us to stay active is by walking or cycling as part of our daily travel. Several policies in the Local Plan look to deliver and have incorporated the Healthy Streets Approach such as, the transport, design and green infrastructure. Our local plan has embedded Health Street Approach throughout.

Figure 3: Transport for London: Healthy Streets Approach indicators

7.8 **Dementia Friendly design:** The Council is an active member of the Merton Dementia Action Alliance (MDAA). In June 2018, the MDAA was recognised with the official 'Working Towards a Dementia Friendly Community' status, in recognition of the work done by members over the past two years. The ambition for the borough is to become a Dementia Friendly borough. The Local Plan recognises and acknowledges the importance of incorporating dementia design approaches within development and environment. These approaches aim to create inclusive environments/neighbourhoods, which will, help reduce stigma and supported people living with dementia, and many other impairments including people with physical and sensory impairments, neurodiverse people (including autism), people with learning disabilities and mental health service users. Inclusive neighbourhoods go beyond providing physical access and creates solutions that work better for everyone; ensuring that everyone can equally and confidently use buildings, transport and public spaces. An inclusive environment is one, which can be, used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people

8. Other assessments

8.1 This section takes a brief look at other assessments that are statutory required as part of the planning process for Local Plans at each stage towards adoption. Some of these assessments do look at human health to some degree.

8.2 [Sustainability Appraisal (SA)/ Strategic Environment Assessment (SEA](#)**):** Merton's Sustainability Appraisal (incorporating Strategic Environmental Assessment (SEA), aim is to promote sustainable development by integrating social, economic, and environmental considerations into the preparation of new or revised plans and strategies. SA/SEA's are a valuable tool for developing sound planning policies and planning development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.

8.3 The SEA assesses the likely significant effects on the environment including short-, medium- and long-term effects; and permanent and temporary effects including secondary, cumulative and synergistic effects, on issues such as: Biodiversity, Population, Human health, Fauna, Flora, Soil, Water, Air, Climatic factors, Material assets, Cultural heritage, including architectural and archaeological heritage, Landscape and inter-relationship between the issues.

8.4 Habitat Regulation Assessments (HRA): The EC (European Commission) Habitats Directive 1992 and Wilds Birds Directive 2009 (transposed into) United Kingdom law, by the Conservation of Habitats and Species Regulations 2017 (as amended) require a Habitats Regulations Assessment (HRA) of land use plans. Establish whether the plan, alone, or in combination with other plans or projects, is likely to have a significant effect on an international nature conservation site (Special Protection Areas (SPA), Special Areas of Conservation (SAC) or Ramsar sites). This is known as, the Habitat Regulation.

8.5 Under the Regulations, local planning authorities must undertake an HRA where, a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects.

8.6 **Equalities Impact and Diversity Assessment (EDIA):** The Equality Act 2010 replaces earlier anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it is unlawful to treat someone. Before the Act came into force there were several pieces of legislation to cover discrimination, including:
- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995

8.7 In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics'- which includes the following: Age, Disability, Sex/Gender, Race or belief, Religion, Sexual Orientation, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity

8.8 The purpose of the EDIA is to assess the impact of a policy, strategy or service in the borough in terms of race, gender and disability. The consideration of religion, age and sexual orientation are also encouraged. Although, the later Equality Act 2010 removed the formal requirement for public bodies in England to undertake or publish a detailed EDIA of their policies practices and decisions (including Local Plans) from April 2011. Local authorities still have a legal duty to 'give due regard' to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to show how they are following this duty.

9.   Health impact assessment

9.1   The London Healthy Urban Development Units (HUDU): Rapid Health Impact Assessment Tool developed as a tool to assess the health impacts of development plans and planning applications. The HUDU tool has influenced Merton's assessment. The following assessment assess the impact of the Local Plan.

Housing design and affordability

Figure 4: Housing design and affordability assessment

Assessment criteria	Policy that meets this requirement
Does the plan address the housing needs of older people for example extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	Policy No. H11.1: Housing choice Policy No. H11.2: Housing Provision Policy No. H11.4: Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system. Policy No. H11.3: Housing mix
Does the plan include homes that can be adapted to support independent living for older and disabled people?	Policy No. H11.4: Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system. Policy D12.3: Ensuring high quality design for all developments
Does the plan promote good design through layout and orientation, meeting internal space standards?	Strategic Policy D12.1: Delivering well designed and resilient neighbourhoods. Policy D12.3: Ensuring high quality design for all developments Policy D12.5: Managing heritage assets Policy D12.6: Tall buildings Policy D12.11: Basements and subterranean design
Does the plan include a range of housing types and sizes, including affordable housing responding to local housing needs?	Policy No. H11.1: Housing choice Policy No. H11.2; Housing Provision:

Does the plan support and seeks to delivery homes that are highly energy efficient?	Policy No. H11.2: Housing Provision Policy CC2.3: Minimising Energy Use Policy CC2.6: Sustainable Design Standards

9.2   Overall housing in Merton is of good quality; however, there are high levels of overcrowding in the east of the borough. As with other parts of London, the cost of housing is less affordable for many. The need for more genuine affordable housing is crucial. More importantly, secure, safe, warm and energy efficient homes is a key determinant of health.

9.3   Merton's housing target, which is set out in the London Plan 2021, is 9,180 homes for the ten-year period 2019/20 to 2028/29 or 918 homes per annum. This is, based on a detailed analysis of land availability and capacity across London that Merton worked with the GLA and all other London boroughs. The London Plan expects 261 homes of the 918 homes per annum to come forward on Small Sites. In Merton, between 85%-95% of our planning applications for new homes are from small sites (sites of 10 homes or less). These small sites contribute about 50% of the overall number of homes built each year with large sites contributing the other 50% of homes built. Large sites make up usually less than 10% of the planning applications received in Merton.

9.4   The housing policies with other policies for example the design policies look to ensure that the right homes are, delivered to meet Merton's housing needs, including homes for disabled people, older people and vulnerable people. With the design policies, they ensure that new homes meet the highest design standards, which are sustainable, energy efficient and contribute positively to creating healthy, inclusive and safe neighbourhoods for all (including women, children and older people).

9.5   The Local Plan recognises the importance of early engagement between the Council, developer and Registered Provider. The Council will continue to engage and work with housing providers to ensure the right housing is, delivered for our communities.

Social infrastructure and accessibility

Figure 5: Social infrastructure and accessibility

Assessment criteria	Policy that meets this requirement
Does the plan keep or re-supply existing social infrastructure?	Strategic policy IN 14.1: Infrastructure Policy IN14.2: Social and community infrastructure
Does the plan assess the impact on health and social care services and has local NHS (National Health Service) organisations been contacted about existing and planned healthcare capacity?	Strategic policy IN 14.1: Infrastructure Policy IN14.2: Social and community infrastructure Strategic policy HW10.1 Health (including mental health) and wellbeing
Does the plan include the provision or replacement of a healthcare facility and does the facility meet NHS requirements?	Strategic policy IN 14.1: Infrastructure Policy IN14.2: Social and community infrastructure Strategic policy HW10.1 Health (including mental health) and wellbeing
Does the plan assess the capacity, location and accessibility of other social infrastructure, e.g., primary, secondary and post 19 education needs and community facilities?	Site allocations and Strategic policy IN 14.1: Infrastructure Policy IN14.2: Social and community infrastructure
Does the plan explore opportunities for shared community use and co-location of services?	Site allocations and Strategic policy IN 14.1: Infrastructure Policy IN14.2: Social and community infrastructure

9.6 Merton's Infrastructure Delivery Plan (IDP) and health documents mentioned earlier in this document support the infrastructure policies. The IDP has been, shaped in partnership with key stakeholders for example the NHS and other health bodies/organisations. It identifies the anticipated strategic requirements for the provisions of a range of different infrastructure types across the borough. These include transport, health, education, green and blue infrastructure, sport and leisure.

9.7   In addition, a new Merton Borough Health and Care Estates Strategy 2021 (MBES). It outlines the priorities for investment in the health, care and Local Government estate that will support the Southwest London Integrated Care System and the delivery of the Merton Health and Care Plan. The MBES has been prepared in partnership with Merton Borough Estates Group, including:

- St George's University Hospital
- Epsom and St Helier Hospital
- South West London and St George's Mental Health Trust
- Central London Community Health Care Trust,
- Merton's 22 GP surgeries
- Merton's Primary Care Networks (PCN)

Access to open space and nature

Figure 6: Access to open space and nature assessment

Assessment criteria	Policy that meets this requirement
Does the plan keep and enhance existing open and natural spaces?	Strategic Policy O15.1: Open Space, Green Infrastructure and Nature Conservation Policy O15.2: Open Space and Green Infrastructure and the Policies Map Strategic policy HW10.1 Health (including mental health) and Wellbeing
In areas of deficiency, does the plan supply new open or natural space, or improve access to existing spaces?	Policy O15.2: Open Space and Green Infrastructure, Policy O15.5; Urban Greening Local Plan Policies Map.

Does the plan supply a range of play spaces for children and young people?	Strategic Policy O8.1 Open Space, Green Infrastructure and Nature Conservation Policy O8.2 Open Space and Green Infrastructure Policy O8.5 Sport and Recreation Policy IN14.3 Sport and Recreation
Does the plan provide links between open and natural spaces and the public realm?	Strategic Policy O15.1: Open Space, Green Infrastructure and Nature Conservation Policy O15.2: Open Space and Green Infrastructure Policy O15.3: Biodiversity and Access to Nature Policy D12.2 Urban design
Are the open and natural spaces welcoming and safe and accessible for all?	Strategic Policy O15.1: Open Space, Green Infrastructure and Nature Conservation Policy O15.2: Open Space and Green Infrastructure Policy O15.3: Biodiversity and Access to Nature Policy D12.2 Urban design
Does the plan set out how new open space will be managed and maintained?	All the Green Infrastructure policy.

9.8   Merton has 1,329 hectares of open space, which accounts for 35% of the borough. Of this, 21% is public open space. In comparison, London has 42% open space, and 18% public open space. Merton's open space cover is similar to our neighbouring boroughs. The largest open spaces in Merton are Wimbledon Common and Mitcham Common, with other large clusters of open space in Morden Park, Cannon Hill and the Wandle Valley.

9.9   Merton has high accessibility to Regional Parks (98%) and Metropolitan Parks (99%). There is also a 'good level' of accessibility to District (77%) and Local (72%) Parks. There is a notable gap in access to District Parks indicated by a continuous band of deficiency from west to northeast through Raynes Park, Wimbledon, Colliers Wood and Mitcham.

9.10   Access to Play Areas - Accessibility standards, as defined by the Mayor's SPG (Supplementary Planning Guidance) on Children's Play and Informal Recreation (2015), provide a benchmark for the provision of play areas across the London, categorising spaces according to the age range of the play area. Access to Play Areas varies greatly in Merton depending on the age range, with:

- Over 12 years having 95% accessibility.
- 5 -11 years having 76% accessibility
- Under 5's just 27% accessibility.

9.11   Whilst access to play provision includes both formal equipped play areas and informal play in open spaces, there is a notable lack of equipped play areas in the northwest of the borough.

9.12   The Local Plan acknowledges benefits and the importance of access to green and blue infrastructure for improving physical and mental health/wellbeing of all. The policies aim to ensure Merton is still an attractive and green borough, through the protection and enhancement of green infrastructure and its natural environment, contributing to reducing the effects of climate change and improve health and wellbeing. The green infrastructure polices have been informed by the following evidence:

9.13   The Merton Green Infrastructure, Biodiversity and Open Space Study (2020). The study assesses the quantity, accessibility, quality and value of open spaces in Merton. It has been, carried out in line with guidance on both a national and London level. The objectives of the study were to:

- Evaluate the quantity, quality, value and accessibility of different types of open space and green infrastructure throughout the borough
- Identify any specific needs or areas of deficiency in access to green and open space and nature conversation areas and how these deficiencies should be addressed
- Determine the impact of projected population changes across the borough and housing intensifications in the identified growth areas and other small sites, on open spaces
- Identify any areas of open space and nature conservation areas that are surplus to requirements, and in accordance with agreed criteria, any areas that have potential to be designated as Local Open Space and/or Metropolitan Open Land
- Undertake a biodiversity assessment of the borough's Sites of Importance for Nature Conservation (SINCs) and

identify any special protection green areas of local importance

- Support the borough's health and wellbeing priorities as set out in Merton's Health and Wellbeing Strategy
- Undertake consultation with user groups in the borough to determine perceptions of Merton's open spaces and priorities for the future
- Provide information that can be, used to underpin the preparation and implementation of new Local Plan policies and the revised Infrastructure Delivery Plan (IDP) and support the future management of green, open and recreational spaces.

9.14   It is, informed by other evidence documents including, the Playing Pitch Strategy (2019) and the Health and Wellbeing Strategy (2019) and will support the preparation of the Infrastructure Delivery Plan (IDP). In turn, this will aid in the justification of future development contributions and the collection and spending of the Community Infrastructure Levy (CIL).

9.15   The Merton Playing Pitch Strategy (2019) - provides the Council with robust evidence base and set of recommendations for future outdoor sports facility development across the borough. The assessment focused on facilities used by the following sports as they were identified as the key sports which use facilities within Merton:

- Football
- Rugby Union
- Cricket
- Hockey

- Tennis
- Bowls
- Athletics
- Water sport

9.16   The findings of the report are based on data collected from several credible sources and working with (but not limited):

- Data tools: Sport England tools, including the Facility Planning Model (FPM), Active Places Power, the Active People Survey, Market Segmentation and the Sports Facility Calculator.
- Consultation and engagement: Stakeholder including Council Officers and Members, Sport England, Relevant National Governing Bodies of Sport, key user clubs.
- The Merton Indoor Sports Facility Study (2020).

Air quality, noise and neighbourhood amenity

Figure 7: Air quality, noise and neighbourhood amenity assessment

Assessment criteria	Policy that meets this requirement
Does the plan minimise construction impacts such as dust, noise, vibration and odours?	Policy P15.10: Improving Air Quality and Minimising Pollution
Does the plan minimise air pollution caused by traffic and energy facilities?	Policy P15.10: Improving Air Quality and Minimising Pollution Policy T16.2 Prioritising active travel choices Policy T16.3 Managing the transport impacts of development Policy T16.4 Parking and Low Emissions Vehicles Strategic policy HW10.1 Health (including mental health) and Wellbeing
Does the plan minimise noise pollution caused by traffic and commercial uses?	Policy P15.10: Improving Air Quality and Minimising Pollution Policy T16.4 Parking and Low Emissions Vehicles Strategic policy HW10.1 Health (including mental health) and Wellbeing

9.17   Air quality is a key concern for our residents. Pollution in Merton comes from a variety of sources. This includes pollution from sources outside of the borough and in the case of particulate matter; a sizeable proportion of this comes from outside London and beyond the UK (United Kingdom). Of the pollution that originates in the borough, the main sources of NO2 are transport (57.1%), domestic gas boilers (18.8%) and static non-road mobile machinery (11.6%).

9.18   The main sources of particulate matter are:

- Road transport (50.4%),
- Re- suspended dust from roads and surfaces (19.9%)
- Static non-road mobile machinery (10.3%).

9.19   In respect of the transport sources, apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NOx (nitrogen oxides) emissions and 80% of the PM10 emissions (based on 2013 modelled data).

9.20   The Environment Audit Committee has estimated that total health costs because of air pollution range between £8.5 billion and £20.2 billion a year. Poor air quality can also have an economic impact by reducing productivity among people of working age. Department for Environment, Food and Rural Affairs (Defra) estimated that in 2012, poor air quality cost the UK economy £2.7 billion through productivity loss.

9.21   Policy *P15.10: Improving Air Quality and Minimising Pollution* seeks to improve air quality and mitigate the impacts of air pollution. Several policies including green and blue infrastructure policies will play a role in reducing and mitigate against the exposure to poor air quality and other pollutants (including land contamination, noise and light). The air quality policy is, supported and informed by, Merton's Air Quality Action Plan, Climate Change Strategy, Climate Change Action Plan, and our health plans/strategies. The Local Plan clearly outline steps to be taken to improve air quality by developers by way of design and layout. Merton's Air Quality Supplementary Planning Document (SPD) provides supplementary detail to the policy setting out the Councils requirements mitigation measures for developments and the detailed expected for Air Quality Assessment (AQA, Construction Management Statements (CMS) and other assessments, where required to support development proposals.

9.22   The policy states that development proposals must consider the impact of introducing new developments in areas already subject to poor air quality. It states that, major developments in Merton, development briefs for large-scale development subject to an Environmental Impact Assessment (EIA) should achieve Air Quality Positive Approach status. It further says, all developments must be at least Air Quality Neutral and resist development proposals which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Merton's Local Air Quality Management Plan.

9.23   Where necessary, applicants will be, expected to carry out noise assessments and provide details of the noise levels on the site. Where noise mitigation measures will be, needed to enable development to take place, an outline application will not normally be acceptable. The Council will seek financial contributions using Planning Obligations towards air quality and noise measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact.

Accessibility and active travel

Figure 8: Accessibility and active travel assessment

Assessment criteria	Policy that meets this requirement
Does the plan address the ten Transport for London: Healthy Streets indicators?	Strategic Policy T16.1 Sustainable Travel Policy T16.2 Prioritising active travel choices Policy T16.3 Managing the transport impacts of development
Does the plan prioritise and encourage walking, for example using shared spaces?	Strategic Policy T16.1 Sustainable Travel Policy T16.2 Prioritising active travel choices
Does the plan prioritise and encourage cycling, for example by providing secure cycle parking, showers and cycle lanes?	Strategic Policy T16.1 Sustainable Travel Policy T16.2 Prioritising active travel choices
Does the plan connect public realm and internal routes to local and strategic cycle and walking networks?	Strategic Policy T16.1 Sustainable Travel Policy T16.2 Prioritising active travel choices Policy T16.5 Supporting transport infrastructure
Does the plan include traffic management and calming measures to help reduce and minimise road injuries?	Strategic Policy T16.1 Sustainable Travel Policy T16.2 Prioritising active travel choices Policy T16.3 Managing the transport impacts of development
Is, the plan well connected to public transport, local services and facilities?	Strategic Policy T16.1 Sustainable Travel Policy T16.2 Prioritising active travel choices Policy T16.3 Managing the transport impacts of development Policy T16.5 Supporting transport infrastructure
Does the plan look to reduce, car use by reducing car-parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Strategic Policy T16.1 Sustainable Travel Policy T16.2 Prioritising active travel choices Policy T16.5 Supporting transport infrastructure

Does the plan allow people with mobility problems or a disability to access buildings and places?	Policy T16.4 Parking and Low Emissions Vehicles

9.24   In terms of active travel, Merton has a higher rate of cycling than the London average however; cycling infrastructure generally is not, well developed as neighbouring boroughs. This is likely to result in certain sections of society being discouraged from using active travel options that can increase physical activity and improve health and wellbeing. Overall, Merton has good access to public transport via train, underground, bus and tram. However, the west of the borough has much greater PTAL levels (Public transport accessibility level) between 4- 6b PTAL when compared to the east of the borough (2- 4 PTAL). The inequalities in access to transport limits and can create a barrier employment opportunities and other essential services such shops, community and social services, across the Merton.

9.25   Many Merton residents have behavioural risk factors that contribute to ill health. One in two residents are overweight or obese, 1 in 7 are smokers and 1 in 5 are physically inactive. All these behavioural risk factors are key contributors to the leading causes of ill health and premature death in Merton most notably cancer and circulatory diseases. Again, these risk factors can be associated with deprivation, certain occupations and quality of housing where outcomes are lower in the east of the borough when compared to the west of the borough.

9.26   The Local Plan recognises that Merton's transport network plays a vital role in connecting communities and enabling people to access homes, jobs, education, services and leisure activities and accommodating these travel needs creates several challenges for the transport network. Traffic volumes in Merton have continued to increase over the last decade; this contributes towards road congestion, and cars dominating in many of the borough's street environments. Major roads that carry heavy and fast flows of traffic create a noisy and unpleasant environment. They can also act as barriers that physically separate communities and can be intimidating and potentially dangerous for pedestrians and cyclists. Not forgetting that transport is also a major producer of the vehicular emissions that contribute towards climate change and poor air pollution.

9.27   The Mayor of London Transport Strategy has set a target for 80% of all trips in London, to be, made on foot, by cycle or using public transport by 2041. The specific target for resident's daily trips in Merton is 73% by 2041, but only 61% of these trips are currently by sustainable modes, so to achieve the ambitious target we will need to work with Transport for London and other partners to facilitate a significant shift in travel choices and behaviour. The most effective way to achieve this will be through the implementation of a comprehensive package of transport measures that offer improved sustainable travel

options alongside measures to better, manage car use, parking and deliveries, including through a transition to low emissions vehicles.

9.28   The transport policies aim to enable residents to make more active travel choices as part of their daily lives and seeks to improve their health and wellbeing. The policies promote and seeks to enable a shift to sustainable travel modes and lower emissions vehicles, by creating safer transport networks accessible for all, including walking and cycling. This will be vital to decarbonise activities by 2050 and to reduce the impact of air pollution to within legal limits. In addition, the transport policies seek to ensures that, new development is adequately managed and integrated with the transport network, including public transport, pedestrian and cycle networks in a sustainable manner which does not contribute further to air quality deterioration, increased noise and congestion.

Crime reduction and community safety

Figure 9: Crime reduction and community safety assessment

Assessment criteria	Policy that meets this requirement
Does the plan incorporate elements to help Design Out Crime?	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods. Strategic policy HW10.1 Health (including mental health) and Wellbeing
Does, the plan incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods. Policy D12.2 Urban design Policy D12.3 Ensuring high quality design for all developments Policy D12.6 Tall buildings

Does the plan include attractive, multi-use public spaces and buildings?	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods. Policy D12.2 Urban design Policy D12.3 Ensuring high quality design for all developments Policy D12.6 Tall buildings

9.29   The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing. Overall, Merton is a safe borough with a crime rate below both the London and England average. Merton compares well to both the London and England average on a range of indicators including children in the youth justice system, first time entrants to the youth justice system, violent sexual crimes and percentage of offenders reoffending. However, Merton performs less well in terms of hospital admissions due to violent crime with 61.6 admissions per 100,000 people. Crime rates in Merton initially dropped during the first lockdown (2020) before rising again through the summer and falling again during the winter lockdown (2020). Crime in Merton is slowly returning to pre-pandemic levels.

9.30   In our 2019 Residents' Survey, only 48% of respondents said they felt safe and thought there are low levels of crime in the borough. In addition, 20% rated drug dealing and use as a 'fairly' big problem/a 'very big' problem. In comparison to 2017, there has been an increase in the number of residents feeling that people using or dealing drugs is a problem (a rise from 11% in 2017 to 20% in 2019). In addition, only 13% of respondents rated safety as one of the best things about living in Merton.

9.31   For young people, the most important issue is tackling crime. Fifty two percent of young respondents said that crime, including drug dealing/use, is the issue that most concerns them. The survey found that 25% of young people aged 11-17 are personally concerned about gangs.

9.32   The policies have informed and influence by several design best practices for example TfL's London Cycle Design Standards, Transport for London (TfL) Healthy Streets, Secured by Design principles, Sport's England Active Design principles, 20 Minute neighbourhood approaches.

9.33   The Local Plan recognises how our streets, town centres, public spaces and neighbourhoods look, feel and function is important for our sense of wellbeing and safety. Developments in the borough will need to meet the highest standards of

design, contribute to creating safe and accessible environment for all including women, children, disabled people and older people. The Local Plan says, '*the spaces between buildings are as important as the buildings themselves. Developments (small and large) must be based on sound and established principles of good urban design*'.

9.34   The design policies seek to create well-designed places and buildings, improve accessibility of our environments and spaces, and create a strong sense of community. Merton's Character Study 2021 supports the design policies. The study brings together a several data sources to build up a clear picture of the borough. GIS (Geographic Information System) data from the Council, Greater London Authority (GLA) Datastore, and Office for National Statistics and other plans, alongside photography, historical research, site visits and analysis. Another supporting document is the Small Site Supplementary Planning Document 2021

9.35   The purpose SPD is to provide design guidance for residential-led projects that provide new homes on sites that are 0.25ha or less in area. The toolkit will help raise the quality of new homes in the borough. It is primarily for; developers and their design teams, who prepare applications for planning permission; planning officers, who assess planning applications; councillors, who make planning decisions; and residents, businesses and their representatives.

9.36   Both documents provided more detail to the design policies in the Local Plan and champions design approaches such as Design Out Crime

Access to healthy food

Figure 10: Access to healthy food assessment

Assessment criteria	Policy that meets this requirement
Does the plan ease the supply of local food, for example allotments, community farms and farmers' markets?	Strategic policy HW10.1 Health (including mental health) and Wellbeing Policy HW10.2: Delivering healthy places. Policy O15.2 Open Space and Green Infrastructure

Are there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Strategic policy EC13.1 Promoting economic growth and successful high streets Policy EC13.2 Business locations in Merton Policy TC13.7 Protecting corner / local shops
Does the plan avoid contributing towards an over-concentration of hot food takeaways in the local area?	Policy HW10.2: Delivering healthy places. Policy TC13.8 Food and drink / leisure and entertainment.

9.37   Local research in Merton shows that there is a concern with impacts of the over concentration of hot food takeaways, particularly on Merton High Street, London Road (Mitcham) and Streatham Road (north Mitcham) all are areas of deprivation. The number of hot food take ways in Merton is 134 units or 6% of retail units in the whole borough (2020). Since, 2016 hot food take away units have been around 6% of all retail units across the borough.

Several policies in the Local Plan including the health and wellbeing, town centres and green infrastructure policies, recognises the important access to local food and shops, opportunities to grow your own food and its contribution in tackle Merton's obesity and other health issues. Local food growing can help to create healthier food environments, improve food security, promote healthy and active lifestyles, help to improve social, and community cohesion. Allotments not only offer biodiversity and conservation value but also bring recreational, health and social benefits, by allowing residents to grow fresh produce. In addition, the Local Plan states that it is important that allotments continue to be, protected while new spaces for growing food are also encouraged. Merton's Green Infrastructure Study identifies there are 21 allotments in Merton; 19 of which are Council owned and the other privately owned.

9.38   Policy *O15.2: Open Space and Green Infrastructure* states that new proposed developments may provide ideal opportunities to incorporate spaces for residents to grow food. This does not have to be in formal allotment areas, but could extend to roofs, walls and balconies or by introducing trees and shrubs that produce food as part of the landscaping. It may be appropriate for areas to be, used temporarily for food growing, provided it does not conflict with other policy objectives or land use priorities and does not have an unacceptable impact on the amenity of adjoining areas. The policy safeguards existing allotments, encourages and support opportunities for community run and managed food growing spaces in new developments.

9.39   Policy *TC13.8: Food and drink / leisure and entertainment* states that *proposals which result in an over-concentration of hot food takeaways will not be permitted as this would detract from the ability to adopt healthy lifestyles*. It goes on to say where any development proposal involving hot food takeaways are permitted, the Council will require the operator to achieve and operate in compliance with, the Healthier Catering Commitment standard.

9.40   Policy *HW10.2: Delivering healthy* place clearly states that the Council will manage and monitor proposals for new hot food takeaways found within 400 metres of the boundaries of a primary or secondary school to promote the availability of healthy foods. The policy is part of an integrated approach that Merton Council, together with other organisations for example health bodies, are taking to improve health and wellbeing, improve health and wellbeing and encourage more active lifestyles.

Access to work and training

Figure 11: Access to work and training assessment

Assessment criteria	Policy that meets this requirement
Does the plan provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Strategic policy EC13.1 Promoting economic growth and successful high streets Policy EC.13.4 Local Employment Opportunities
Does the plan provide childcare facilities?	Policy IN14.2 Social and community infrastructure
Does the plan include managed and affordable workspace for local businesses?	Policy EC13.2 Business locations in Merton
Does the plan include opportunities for work for local people via local procurement arrangements?	Policy EC.13.4 Local Employment Opportunities

9.41 The pandemic has negatively affected Merton's economy, many residents were, furloughed, unemployment rate rising to 6.2% in April 2021, higher than the national rate of 4.8%. The total claimant rate also rose to 7.4% with a higher rate in the east than west where more people work in jobs disproportionally affected by the pandemic. Merton Council and the Local Plan support good employment that provides a stable income and improves skills which supports good mental health and wellbeing.

9.42 The NPPF, London Plan and Merton's economic development policies look to optimise employment opportunities for residents by supporting new development of business premise and protection of employment land. The policies also direct new employment opportunities to the most '*appropriate and sustainable locations*'. As well as, seeking to maximise employment, business and other economic development opportunities the policies seek to support the transition to a low carbon economy and a green economy.

9.43 The economic with the neighbourhood policies seek remove barriers to local employment and help support sustainable local business growth. Policy EC.13.4 Local Employment Opportunities ensures that residents and local businesses are, supported within the borough through local employment, business retention and inward investment opportunities, which will lead to greater local economic growth. Moreover, the Local Plan recognises the opportunities offered by new development, in both the construction and operational phases, to improve residents' access to skills, training and employment. Importantly, securing job placements within the end use of a development, rather than solely in the construction phase will be important to ensure residents fully benefit in the long term from the diverse opportunities economic growth brings. Policy EC13.2 Business locations in Merton encourage flexible and affordable workspaces.

Social cohesion and inclusive design

Figure 12: Social cohesion and inclusive design assessment

Assessment criteria	Policy that meets this requirement
Does the plan consider health inequalities by addressing local needs?	Strategic policy HW10.1 Health (including mental health) and Wellbeing Policy HW10.2: Delivering healthy places Policy No. H11.1 Housing choice Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods Strategic Policy T16.1 Sustainable Travel Policy IN14.3 Sport and Recreation
Does the plan connect with existing communities, i.e., layout and movement which avoids physical barriers and severance, and land uses and spaces which encourage social interaction?	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods Policy D12.2 Urban design Strategic policy HW10.1 Health (including mental health) and Wellbeing Policy HW10.2: Delivering healthy places Strategic Policy T16.1 Sustainable Travel Site allocations Policies Map
Does the plan include a mix of uses and a range of community facilities?	Strategic policy IN 14.1 Infrastructure Policy IN14.2 Social and community infrastructure
Does the plan provide opportunities for the voluntary and community sectors?	Policy IN14.2 Social and community infrastructure
Does the plan consider issues and principles of inclusive and age-friendly design?	Strategic policy HW10.1 Health (including mental health) and Wellbeing Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods Policy D12.2 Urban design Policy D12.4 Alterations and extensions to existing buildings

9.44   As mentioned earlier in this document the Council works with several stakeholders including our active and vibrant voluntary and community sector. The voluntary and community sector already provides a wide range of valuable services and makes a positive contribution to the lives of many in Merton.

9.45   An example of collaborative working stream is [Merton Partnership](). It brings together a range of key partners from the public, private, community and voluntary sectors in Merton. Its aim is to provide leadership and to co-ordinate joined up responses to issues where there is real benefit to different groups working together to improve the economic, social and environmental wellbeing of those that live and work in the borough.

9.46   The Local Plan acknowledges that planning can play a pivotal role in influencing key health determinants, especially towards improving long-term outcomes and addressing health inequalities. It understands that delivering health outcomes will be important for the Covid pandemic recovery, reduce inequalities in the borough and support reliance. Delivering growth means prioritising health and wellbeing in all planning decisions. Health in all policies approach is embedded is the Local Plan.

9.47   The Policies Map identifies the land designations for the borough. It also, identifies site allocations, green and blue infrastructure, transport network (including cycle route and footpaths) and historic assets (including buildings, gardens, walls/remains and other assets). More importantly, it shows transport network improvements including cycle routes, footpath and other mode of travel.

9.48   Strategic policy HW10.1 Health (including mental health) and Wellbeing supports and encourages dementia friendly design approaches by way design and layout of buildings and public spaces. It recognises that dementia friendly design approaches aim to create inclusive environments/neighbourhoods, which will, help reduce stigma, and supported people living with dementia and many other impairments including people with physical and sensory impairments, neurodiverse people (including autism), people with learning disabilities and mental health service users.

9.49   Additionally, the Local Plan clearly understands and states that inclusive neighbourhoods go beyond providing physical access and creates solutions that work better for everyone, ensuring that everyone can equally and confidently buildings, transport and public spaces. It is one, which can be, used safely, easily and with dignity by all. Additionally, it is convenient and welcoming with no disabling barriers, and provides independent access without added undue

effort, separation or special treatment for any group of people. Dementia approaches is encouraged in several design policies all, aiming to reducing inequalities, improving health (including mental health) and wellbeing and support and assist social inclusion for all.

9.50   The infrastructure needs for Merton, will be primarily to support the additional housing needed over the Local Plan period. The Council has identified strategic priorities for health provision, education, transport infrastructure, digital infrastructure, water, wastewater and sewerage provision and supporting future needs of the emergency services (see IDP). Where there is an infrastructure capacity problem, the Council will require developers to fund appropriate improvements and where necessary, ensure improvements are, completed prior to occupation.

9.51   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 (not intended to be exhaustive list). Policy IN14.2 Social and community infrastructure places a high priority on the provision and improvement of social and community infrastructure. It says that '*the Council will support and encourage the most effective use of social and community infrastructure, to support the changing priorities and needs in the borough*'. Any proposal for a loss of social and community infrastructure will have meet the criteria set out in policy IN14.2 Social and community infrastructure.

9.52   Furthermore, the policy clearly says that the Council will also; support the shared use of community sites by different service providers across the public, private and voluntary sector. The site allocations set out the land uses that must be, provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any site allocations development proposal will be determined against planning polices (as well as the London Plan and NPPF). Several sites have land uses that include social and community uses.

Minimising the use of resources

Figure 13: Minimising the use of resources

Assessment criteria	Policy that meets this requirement
Does the plan make best use of existing land?	Local Plan site allocation, across the borough
Does the plan encourage recycling, including building materials?	Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change Policy CC2.5 Minimising Waste and Promoting a Circular Economy Policy CC2.6 Sustainable Design Standards Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods Policy D12.3 Ensuring high quality design for all developments
Does the plan incorporate sustainable design and construction techniques?	Policy CC2.6 Sustainable Design Standards Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods

9.53   The Council supports the move towards a more circular economy. A circular economy promotes waste minimisation by moving from a more traditional linear model of resource use, consumption and disposal, to one that promotes; long-term sustained use, reuse and recycling. Policy CC2.5 Minimising Waste and Promoting a Circular Economy will require all development proposals to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon. The policy requires circular economy principles should be, embedded across all facets of the development lifecycle - from concept and design to build-out and occupation/ use, to increase resource efficiency, minimise operational and embodied carbon emissions, and minimise residual waste, in line with Section R2 of the National Design Codes Careful selection of materials and construction techniques.

9.54   Policy CC2.6 Sustainable Design Standards requires high design standards which are, sustainably designed and constructed from new development, change of use, conversions and refurbishments and that all development makes effective use of resources and materials, minimises water use, and assists in meeting local and national carbon reduction targets. The Local Plan acknowledges the national sustainable design and construction standards such as BREEAM (Building Research Establishment Environmental Assessment Method) which ensures that a development's full impact on

the environment, including water use, transport and land use and ecology, as well as energy use and waste are considered and addressed.

Climate change

Figure 14: Climate change

Assessment criteria	Policy that meets this requirement
Does the plan incorporate renewable energy?	Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change Policy CC2.2 Minimising Greenhouse Gas Emissions Policy CC2.4 Low Carbon Energy
Does the plan ensure that buildings and public spaces are designed to respond to winter and summer temperatures, for example ventilation, shading and landscaping?	Policy O15.5 Urban Greening Policy O15.6 Wandle Valley Regional Park Policy P15.10: Improving Air Quality and Minimising Pollution Policy D12.3 Ensuring high quality design for all developments Policy F15.9 Sustainable Drainage Systems (SUDS) Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change Policy CC2.4 Low Carbon Energy
Does the plan maintain or enhance biodiversity?	Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation Policy O15.3 Biodiversity and Access to Nature Policy O15.4 Protection of Trees
Does the plan incorporate sustainable urban drainage techniques?	Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage Policy F15.8 Managing Local Flooding Policy O15.3 Biodiversity and Access to Nature Policy D12.2 Urban design Local Plan site allocations

9.55   Merton Council declared a Climate Emergency in 2019 and is committed to working towards becoming a carbon neutral borough by 2050 and a carbon neutral Council by 2030, in line with the national and regional targets.

9.56   The Local Plan requires all buildings in Merton to run at net-zero carbon by 2050, to achieve our carbon reduction target. Policy CC2.4 Low Carbon Energy requires all proposed developments within the borough to demonstrate that they have made the fullest contribution to supplying energy efficiently and cleanly, and maximising renewable and low carbon energy generation, storage and use, through the deployment of appropriately selected, sized and sited technologies. The use of renewable and low-carbon micro-generation technologies (e.g. solar photovoltaic panels, solar thermal and air source heat pumps) is also encouraged as part of the development proposals. The climate changes policies also:

- Recognise and adapt to Merton's changing climate and ensure that development mitigates the risk of overheating and flooding and maximises comfort and wellbeing in a changing climate.
- Looks to maximise opportunities to enhance green infrastructure and tree planting to deliver multifunctional benefits such as minimising the urban heat effect, enhancing natural carbon sinks and improving air quality
- Acknowledges there is extensive evidence that human induced global warming has already caused significant changes to the climate system including an increased frequency and intensity of extreme weather events such as heatwaves and heavy precipitation events. This trend is expected to continue as the magnitude of warming increases

9.57   Together with Policy O15.5 Urban Greening, they seek to ensure that urban greening is, incorporated into the design of new development to assist in mitigating the risk of overheating and flooding and, the adverse impacts on the urban heat island effect.

9.58   Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on public authorities to have regard to the purpose of conserving biodiversity, through policy and decision-making. The Council is committed to protecting and enhancing biodiversity, particularly on sites of recognised nature conservation. The protection and enhancement of biodiversity is important, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature. Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation looks to protect and enhance open spaces in the borough including Metropolitan Open Land, parks, other open spaces and areas of nature conservation to provide high quality environments for all residents. The policy supports the objectives of the Mayor's in protecting and enhancing the borough's biodiversity, particularly on sites of recognised nature conservation interest.

9.59   Policy O15.3 Biodiversity and Access to Nature requires development to contribute to net gains in biodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links.

9.60   The Council as Lead Local Flood Authority (LLFA) will continue to work in partnership with the Environment Agency, water and sewage companies, developers, neighbouring boroughs and local communities to manage and reduce flood risk from all sources. Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage requires all developments to incorporate flood resilience measures and be adaptable to the future impacts of climate change. The policy ensures that all major development includes water efficiency measures such as rainwater harvesting or grey water recycling to minimise water consumption. The Local Plan recognises the importance of SUDS (Sustainable Drainage Systems) to deliver multi-functional benefits such as managing surface water runoff, improving biodiversity, and providing amenity and water quality benefits.

9.61   Policy F15.9 Sustainable Drainage Systems (SUDS) requires all developments to reduce the risk of flooding. The policy stresses that the Council will expect mitigating measures against the impact of flooding from all sources. It ensures all new development including basement and subterranean development implement appropriate SUDS and show sustainable approaches to the management of surface water in line with the Non-Statutory Technical Standards for SUDS. Furthermore, the policy ensures that developers provide plans of the maintenance and long-term management of SUDS through a SUDS Management Plan submitted as part of the planning process. The policy also requires developers to incorporate soft landscaping, appropriate planting (including trees and shrubs) and permeable surfaces into all new developments including non-residential developments, in line with Policy O15.7 Urban Greening.

10.   Conclusion

10.1   It is clear from the above assessment that the Local Plan supports the health priorities of the Council and is likely to assist in improving health and wellbeing Merton. The Local Plan recognises the importance of working with communities, stakeholders and businesses to make Merton a healthy, safer and greener place

10.2   In the context of this HIA, it seeks to (summary):

- Improve air quality, tackling climate change and adopting flood mitigation such as Sustainable Design measures (SUDS)
- Deliver good quality design homes (including affordable homes)
- Enable and encourage more active lifestyles for all
- Become a dementia friendly borough and reduce the stigma and support people living with dementia and many other impairments - people with physical and sensory impairments, neurodiverse people (including autism), people with learning disabilities
- Create healthier, greener and accessible neighbourhoods with easy access to green/blue infrastructure and other essential services.
- Tackle health and income inequalities across the borough and support the Covid-19 recovery
- Incorporate design approaches that will assist in improving health and wellbeing, improve access and movement
- Ensure the new development consider health as part of design and layout by requiring Health Impact Assessment to be carried out as part of development proposals
- Promote, encourage and enable healthier lifestyle

11.   Monitoring

11.1   The performance of the Local Plan will be, monitored annually in Merton's Annual Monitoring Report as statutory required by the Local Planning Authority (planning policy team). The indicators will be, monitored by Merton Public Health team, who will report the findings annually to the Health and Wellbeing Board (HWB). If the HWB requires any, further updates or, request research to be undertaken, based on the indictors below, it will be conducted by the public health team. The following indicators are based on the Health and Wellbeing Strategy *start well, live well, age well* in a **healthy place** theme.

Figure 15: Health monitoring indicators

Health and wellbeing strategy themes and selected related Local plan aspirations	Indicator
Start well	
To manage and monitor proposals for new hot food takeaways found within 400m of the boundaries of a primary or secondary schools	The number of new hot food take ways approved within 400m of a school each year.
Live well	
Building affordable homes • 50% of new homes built in Merton between 2021-2036 to be affordable • To deliver a minimum of 11,732 additional homes between 2021-2036 Building energy efficient homes • All new developments of 10 or more units to achieve at least a 60% improvement in terms of energy efficiency compared to Building regulations 2013 • All new development to use low carbon heat. There can be no gas boilers in new dwellings or new non-domestic development in Merton from 2023	Number of affordable homes built in Merton annually Percentage of households living in fuel poverty annually The percentage of excess winter deaths in Merton annually
Active design • Enabling walking and cycling by improving local infrastructure	% Increase Of adults cycling for 3 days a week
• To support economic recovery, business investment and job growth • tackle the causes of ill health and health inequalities in Merton.	Unemployment, % of the working age population claiming out of work benefit by ward

Age well	
Dementia friendly environment	Number of planning proposals incorporating a dementia friendly approach
In a healthy place	
Design the layout of development sites in accordance with the Healthy Streets Approach and prioritise safe and convenient access routes for pedestrians, cyclists and those with disabilities.	Number of pedestrian or cycling casualties per year Number of planning proposals that have been assessed against the TfL Heathy Street indicators.

12. Recommendations

12.1   The HIA recommends that:

a. Should the Local Plan (once adopted), in the future be, reviewed, updated, or there a need for new Local Plan that, a HIA is, carried out as part of this process. If, a 5-year review of the Local Plan is, carried out, the health impacts will be, assessed in more detail at the time.

b. The policy planning team continues to engage with and consult Public Health team on other development planning documents such as planning briefs and Masterplans. That a HIA is carried out to identify the health impacts of development planning documents and to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities.