

Sustainability Appraisal (SA) incorporating Strategic
Environmental Assessment (SEA) for the Local Plan
Submission including proposed amendments
November 2021 Revised

Non-technical summary

1 Purpose of sustainability appraisal

1.1 This is the Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA) for Merton's draft proposed submission Local Plan (stage 3), Environment Report. The timetable for the Local Plan towards adoption can be found in figure 3 This report is stages C1 and D1-D2 of the SEA/SA process (see figure 1)

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

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

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

1.3 The purpose of Merton's Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating social, economic, and environmental considerations into the preparation of new or revised plans and strategies. It is imperative to begin the SA/SEA at the first stages of plan making to find the key sustainability issues that are affected by the implementation of the plan; it helps with creating development options and assesses any significant effects of the proposed development. SA/SEA's are a valuable tool for developing sound planning policies and development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.

The SEA processes

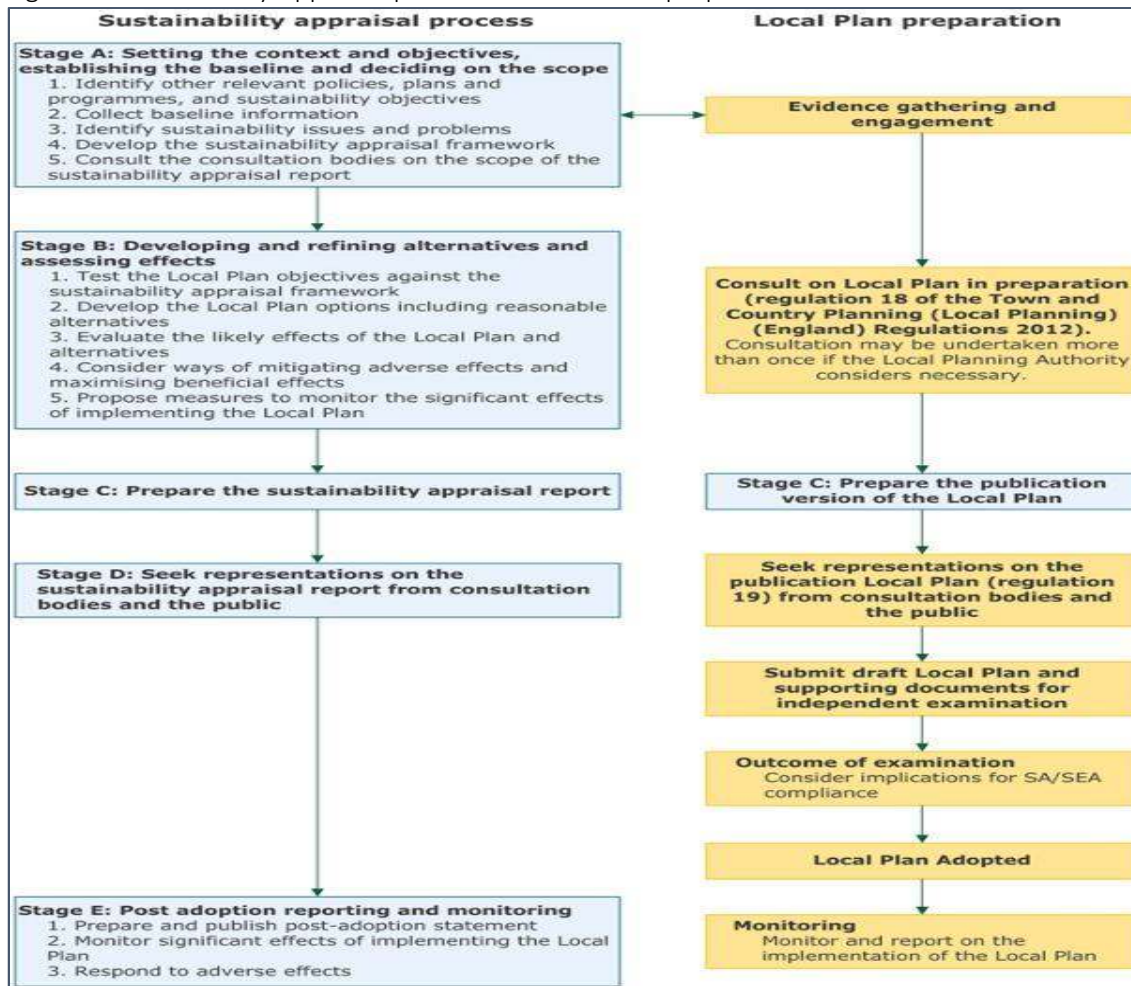
- 1.4 The SEA is an iterative process informing each stage of the Local Plan’s development. The aim of the SEA is to decide which impacts are likely to be significant and therefore and what the assessment should concentrate on. This is achieved by, the selection of SEA objectives and indicators, which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

Figure 1: Stages in the SEA process

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

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

Figure 2: Sustainability Appraisal process and Local Plan preparation



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

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

Figure 3: Key Outputs of the SA process

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

What is the new Local Plan?

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

Figure 4: Local Plan timetable

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

2 Other assessments

Habitat Regulation Assessments

- 2.1 The EU directive on the Conservation of Natural Habitats and Wild Fauna and Flora¹, also referred to as the 'Habitats Directive', provides legal protection for habitats of exceptional European importance. Article two of the directive requires the restoration and maintenance of habitats and species to a favourable conservation status and subsequent articles set up the means to designate protection areas. These are set up either as Special Areas of Conservation (SAC) or Special Protection Areas (SPA) depending on the protection aim.
- 2.2 In order that these designated areas are protected, the Habitats Directive has set the requirement for plans and projects to be assessed for their likely impact on them. In order to ensure that they do not have a negative impact. The assessment is to ensure that any significant effects are identified and avoided.
- 2.3 The Conservation (Natural Habitats &c) Regulations 1994 have been amended to implement a judgement of the European Court of Justice. The amended Regulations came into force in 2007. The effect of the Regulations (as amended) is to add Part IVA (Regulations 85A -85E) under the title "*Appropriate Assessments for Land Use Plans in England and Wales*".
- 2.4 The essential requirement of this amendment is for the Local Planning Authority (LPA), in this case Merton Council; to assess the potential effects of land use plans, to ensure that the planning process at a local level considers the protection and integrity of European Sites. The process by which this is achieved is by way of a Habitats Regulations Assessment (HRA). The HRA assess the impacts of a land-use plan against the conservation objectives of sites to ascertain whether it would adversely affect the integrity of that site.
- 2.5 The European Sites network (also known as Natura 2000) provides for the protection of sites that are of exceptional importance for rare endangered or vulnerable natural habitats and species within the European Community. These sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS). Ramsar sites (wetlands of international

¹ http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

importance) are included as if they are fully designated European Sites for considering development proposals that may affect them. Merton's HRA found that the Local Plan would not have an adverse impact on the European sites.

Health Impact Assessments (HIA)

- 2.6 The purpose of HIA is to promote sustainable development by integrating health (including mental health) and wellbeing considerations into the preparation of plans or strategies by identifying the key health and wellbeing issues and the groups that are likely to be affected by the implementation of the Plan. Merton's HIA found the Local Plan has positive effects on tackling health inequalities and in improving, the wider determinates of health.

3 Baseline data summary

Data limitations

- 3.1 Information or data used to help explain current situations or trends change over time. However, this does not necessarily link cause and effect overtly and is limited in how ~~they~~ it can explain why particular trends are occurring and the secondary effects of any changes. The data therefore acts as an indicator and been selected to monitor progress towards the achievement of particular objectives and to provide a tangible measure concerning broader issues. This measure is often only a small part of meeting the objective so may simplify the issues and interactions.
- 3.2 The appraisal, therefore, relies on a mixture of quantified data and professional judgement. Accordingly, the baseline includes a commentary concerning the trend indicated by the current and historical data. External bodies collect much of the data used in this report for example Office of National Statics (ONS) and the Greater London Authority (GLA). The spatial and temporal data collected and future changes to the methodology of the data collect are not within the control of Merton Council. Please note there are some gaps in the data collected, as not all information is consistently available. As part of the SA/SEA, process **we prepared** a Scoping Report including baseline data. For this report, the Council has carried out a summary update of the baseline data.

Merton the place

- 3.3 Merton is an outer London borough situated to the southwest of the capital. It borders with the London Boroughs of Wandsworth, Sutton, Kingston-upon Thames, Croydon and Lambeth. The borough is predominantly residential in character (42% of the area) but with variation in density and characteristics of development particularly between the east to west and north to south of the borough and associated economic and social differences.
- 3.4 Merton is the one of the smallest boroughs in London with an area of 37 square kilometres. Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in London. Around 48.32% of the borough's area is open space, compared to the 10% London average.
- 3.5 The quality and historical character of the borough reflects the number of high-quality heritage areas designated as Conservation Areas. The northern parts of the borough are characterised by tightly packed streets of late Victorian or Edwardian terraced housing around north Mitcham, Colliers Wood, South Wimbledon and Wimbledon Park and larger detached or semi-detached homes around Wimbledon.
- 3.6 The 1930's suburbia characterises large parts of the south and west of Merton with lower density semi-detached houses and short terraces with gardens, in tree lined roads with wide grass verges. These areas merge with the neighbouring boroughs of Sutton and Croydon. Within Merton, there are a number of pockets of affluence and of multiple deprivation. Although deprivation is mainly in the eastern side of the borough merging with Lambeth and Croydon, there are also some pockets in the west of the borough. A full detailed baseline data can be found in Appendix A.

4 Summary of influence of appraisal

- 4.1 The findings of the appraisal has influence and has been used to help define the most sustainable policies in terms of, where the 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.
- 4.2 The SA/SEA scoping report identified the issues in Merton in the context of environmental, social and economic. It looked at the most up to date data to also, identify problems and issues in Merton. This work formed the SA Assessment Framework and decision-making criteria, which, lead to developing the SA objectives. These objectives would be used to assess the Local Plan.
- 4.3 The SA report (stage b) establishing the strategic approach for the Local Plan by way of developing strategic alternatives. Four options were, assessed they were:
- Option 1: Focus on regeneration: Continue to develop and grow within town centres.
 - Option 2: Focus on public transport: Develop and grow within areas of good transport links
 - Option 3: Focus on renewal: Develop and grow in areas of deprivation
 - Option 4: Allow the market to lead (*Laissez faire* approach): No Local Plan
- 4.4 The SA/SEA report 2018 found that option 4 was not viable – it found the likely effects to be negative in relation to all of the SA objectives. This is because without the strategic development sites allocated in the Local Plan, the quantum and spread of new development in the borough would not be planned or managed and could lead to development proposals coming forward in less sustainable locations e.g. area with poor transport infrastructure or poor accessibility to essential services. In addition, the wrong type of housing to meet local needs such as affordable housing. Furthermore, the quality and design of development could not be guaranteed especially in area of with historic assets. No Local Plan would also mean no protection of local open spaces, biodiversity and so on; no opportunity to mitigate against or adapt to climate change by way housing development, flood risk management energy use and air quality for example.
- 4.5 Both options 1 and 2 was found to have largely positive effects on the social and economic objectives as development would be focused near to, or accessible from, the main areas where existing jobs, services and facilities are generally located. Under option 3, there are largely positive effects on the social objectives in areas of housing and potential job creation and opportunities. It is, in

this context that, the Local Plan is developed. The Local Plan’s Chapter 1b *Good Growth* and the *urban development objectives and vision* illustrates the important role the SA/SEA has played in influencing and shaping the Local Plan.

Figure 5: Measuring the options against the sustainable objectives

Sustainable objectives	Option 1: Focus on regeneration <i>Continue to develop and grow within town centres.</i>	Option 2: Focus on public transport <i>Develop and grow within areas with good public transport links</i>	Option 3: Focus on renewal <i>Develop and grow in areas of deprivation</i>	Option 4: Allow the market to lead <i>No Local Plan</i>
Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.				
Biodiversity To protect and conserve Merton’s biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).				
Land and soil condition and pollutants To conserve Merton’s geodiversity and protect soils from development and over intensive use.				
Sustainable land use To make the best and most efficient use of land so as to support sustainable patterns and forms of development.				
Heritage (including architectural and archaeological heritage) To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation				

to their significance and their settings.				
Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.				
Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.				
Noise and vibration To minimise noise, vibration levels and disruption to people and communities.				
Water quality To protect and enhance Merton's water bodies.				
Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.				
Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity				
Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.				
Energy use To improve energy efficiency in new developments Increase renewable energy supply / provision				
Health and well being To facilitate and improve the health and wellbeing of the				

population, reduce health inequalities and deliver safer and more secure communities.				
Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.				
Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.				
Population demand and growth To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness				
Social inclusion and cohesion To ensure Merton has socially integrated communities which are strong, resilient and inclusive.				
Design To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.				
Local employment To develop and maintain a healthy labour market				
Education and skills To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and BAME groups.				

<p>Economic growth To increase the vitality and viability of existing town centres, local centres and parades</p> <p>To ensure that there is a mixed of business spaces including, affordable spaces in Merton.</p>				
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Figure 6: Measuring the likely impact of no local plan

Topic area	Sustainability issue(s)	Likely impact in the absence of a Local Plan
Air quality	<p>High levels of NOx (nitrogen oxides), PM₁₀, and PM₂₅ emissions from road traffic.</p> <p>London is not meeting legal value for NO₂.</p> <p>Exposure to poor air quality is unequal across the borough and some parts of the borough more exposed to air quality.</p>	<p>With no additional measures to tackle air quality, London will continue to be non-compliant with EU legal limits, with higher levels of exposure to harmful pollutants.</p> <p>Increasing economic growth and development will lead to increased emissions from construction, buildings car uses and congestion leading to localised air quality issues in Merton.</p>
Climate change	<p>Transport is likely to continue to contribute to CO2 emissions.</p> <p>CO2 emissions from buildings likely to continue to rise.</p> <p>Increase in extreme weather events such as flooding, drought, heat exposure and associated adverse health risks to population and potentially pressures to health services.</p>	<p>Climate change effects will continue to increase and occur more often, such as increased temperatures, droughts, severe storms and other extreme weather events and flooding seen in the recent years.</p>

	<p>Growing ageing population and increase in children may lead increase in vulnerable population.</p> <p>Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect.</p>	
Energy use and supply	<p>Insufficient low carbon energy supply.</p> <p>High number of Merton residents living in fuel poverty.</p>	Without additional measures energy use is likely to increase having an adverse impact to in creating a more sustainable borough.
Water recourse and quality	Need to reduce water usage and consumption per capita.	Increase demand for water and deterioration of water quality.
Flood risk	<p>Risk of flooding to property and people from river, surface water, sewer, groundwater and reservoir.</p> <p>Increase in run-off, potential contamination and disruption of flows.</p>	Without additional measure to prevent development in areas of flood risk and mitigate against increasing flood risk, the number of people/properties at risk will increase.
Nature environment (Biodiversity/open space).	<p>The loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development.</p> <p>Impact of climate change and threat of new pest and diseases.</p> <p>Poor connectivity to green infrastructure.</p>	The increase of development pressure will reduce the amount of green space and reduce the quality of existing green spaces with no funding or investment.
Historic Environment (Heritage, architectural and archaeological heritage)	<p>Heritage assets at risk from neglect, decay, inappropriate development and air pollution.</p> <p>Pressure of development on the settings and surrounding area of heritage assets.</p>	Heritage assets likely to be protect by way of legislation, however the environment will continue to be most at risk from increased pressure development.
	Poor quality public realm	Design challenges for Merton's built and natural environments may not be consistently addressed.

Design	<p>Poor design of the built environment, not adopting an inclusive design approach from the outset.</p> <p>Risk of poor design, lack of legible neighbourhoods and sense of place.</p>	
Sustainable land use	<p>Non efficient use of land.</p> <p>Lack of land for housing development to meet Merton's housing needs.</p> <p>Higher density development.</p> <p>Competing pressures for land will impact on the ability to provide social infrastructure and green infrastructure.</p> <p>Integration of land use and transport.</p>	<p>Pressures from development and competition between the types of development uses will increase, which may lead to unsustainable patterns.</p>
Soil and geology	<p>Threat to geodiversity because of increased demand for development.</p> <p>Remediation of contaminated land</p>	<p>Greater impact on geology and soils from development.</p> <p>Innovative solutions to reduce the impact of the cost of remediation are also needed.</p>
Noise	<p>Increased noise from night-time economy, freight movement and deliveries associated with mixed used developments.</p>	<p>Likely increase of the population exposed to noise and noise related activities.</p>
Demographic change	<p>Increase in Merton's population.</p> <p>Growing ageing and diverse populations.</p> <p>Uncertainty of the composition of the population, including migration patterns.</p>	<p>Such increases in population likely to lead to increased pressure and competition for land for different types of development.</p>
	<p>Increased aging population</p>	<p>Benefits /dis-benefits of growth are likely to affect</p>

Social Integration	<p>Remaining causes of multiple deprivation.</p> <p>Ageing population may lead to more isolation.</p> <p>Lack of cohesion.</p> <p>Risk of poor design, a lack of legible neighbourhoods and a sense of place.</p>	groups of people differently, especially vulnerable communities.
Health and health inequalities	<p>Increased health inequalities across the borough, especially wards in the east of the borough.</p> <p>Increase pressures on the health service and service provisions.</p> <p>Differences in life expectancy in east of the borough and diverse communities.</p> <p>Widening social inequalities.</p> <p>Low levels of physical activities in children and adults and some diverse communities.</p> <p>Increasing child obesity</p>	<p>Obesity is a growing problem in Merton; problem is significantly worrying in the east of the borough.</p> <p>Increased pressures on the health sector to deal with complex health needs.</p>
Crime and safety	<p>Perception of lack of safety.</p> <p>Fear of crime is creating a barrier to activities for some communities.</p> <p>Vulnerably of different groups (for ethnic minority groups and Protected Characteristic groups).</p>	Social isolation of some groups is likely to increase as their fear if crime or anti-social behaviour will make them more reluctant to go out and use facilities, services including libraries, shops, green spaces or use public transport.

	More vibrant night-time economy may lead to an increased fear of crime.	
Housing	Lack of affordable housing Lack of housing meeting local needs/under supply Increase in homelessness.	Challenges to meet housing demands in Merton (including requirements size, type tenure) are likely to increase.
Education and skills	Variations in educational achievement and attainment across the borough Lack of support for transition from education to work	Inability to access high paid jobs may have a significant impact on people from deprived areas, BAME (Black and Asian Minority Ethnic) groups and women. Increase in the levels of social deprivation and poverty.
Local employment	Disparities between the east and west of the borough in types of jobs available or occupied by population in part of the borough. Disparity between wages and the cost of living Lack of diversity in jobs available across the borough	Disparities between wages and cost of living and lack of diversity in jobs could impact on Merton's economic growth and stability. Ability to attract a flexible and diverse work force.
Economic growth	Increased pressure infrastructure due to economic growth Lack of high speed and efficient digital connectivity in some part of the borough. Loss of employment land because of housing supply pressures. Insufficient floorspace to meet needs. Lack of affordable business space for small and medium size businesses and start-ups.	Without investment in Merton's infrastructure and land use policies to ensure the sufficient provision of employment and business spaces (type, location and cost), Merton cannot have a sustainable local economy. This is likely to threaten Merton's growing local economy, job creation and continuous sustainable growth. All of which will have a direct adverse impact to local populations.

	Adverse impact on town centres as a result of reduction in demand for floorspace.	
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5 Appraisal method

5.1 The national Planning Practice Guidance (PPG) and best practice provides guidance for the undertaking of the SA. The appraisal methodology outlined below, it ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended. Several guides are available on SA/SEA and the methodologies outlined. The following have informed this SA/SEA where, still applicable:

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

Figure 7: SA scoring matrix (used in all SA/SEAs)

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
	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

5.2 In order to assess how the Local Plan contributes to sustainability; a set of sustainability objectives was developed. The objectives are as follows (figure 8). The figure shows which SEA topic requirement are met. The sustainability appraisal

framework also comprises a series of indicators, which are designed to enable an indication of the effect of a policy or proposal on sustainability to be identified.

Figure 8 Sustainability Appraisal objectives		SEA Topic requirements
SO1	Air quality: To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Air Human Health Population
SO2	Biodiversity: To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	Biodiversity Flora Fauna
SO3	Land and soil condition and pollutants: To conserve Merton's geodiversity and protect soils from development and over intensive use.	Soil Landscape Human Health Biodiversity Flora Fauna
SO4	Sustainable land use: To make the best and most efficient use of land to support sustainable patterns and forms of development.	Landscape
SO5	Heritage (including architectural and archaeological heritage): To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Cultural heritage, including architectural and archaeological heritage.
SO6	Flood risk management: To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Water Climate Factors Human health
SO7	Climate change: To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Climate Factors Material assets
SO8	Noise and vibration: To minimise noise, vibration levels and disruption to people and communities.	Human Health
SO9	Water quality: To protect and enhance Merton's water bodies.	Water Human Health Flora Fauna
SO10	Water consumption: Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Water Human

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

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

5.3 In order to assess how the Local Plan contributes to sustainability; a set of sustainability objectives was developed. The objectives are as follows (figure x). The figure shows which SEA topic requirement are met. The sustainability appraisal framework also comprises a series of indicators, which designed to enable an indication of the effect of a policy or proposal on sustainability, identified. It should be noted that following comment from the Historic England the Council has amended the wording below in figure 9 These are and indicated in **red** below. The changes either strengthen pervious wording or were items omitted by the Council in the SA/SEA, but, were, considered in assessing the Local Plan by conservation officers.

SA Assessment Framework and decision-making criteria.

Figure 9: SA framework and decision-making criteria.

Sustainability Objectives	Decision making criteria.	Assessing of Local Plan Policies
Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	<ul style="list-style-type: none"> Will it impact on locations that are sensitive to air pollution? 	Analysis of: <ul style="list-style-type: none"> The whole borough is an Air Quality Management Area Annual air quality reports
Biodiversity To protect and conserve Merton’s biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other	<ul style="list-style-type: none"> Will it impact on national, regional or local BAP habitats and/or species? Does it affect a site designated for nature conservation purposes? Will it impact on access to nature? Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non- designated sites? 	Analysis of: <ul style="list-style-type: none"> Sites designated for nature conservation purposes, including SSSI (Sites of Special Scientific Interest) and SINC (Sites of Importance to Nature Conservation). Existing on-site habitats and

features).	<ul style="list-style-type: none"> • Will it impact on existing networks of open spaces and create new green spaces? • Will it lead to a degradation or fragmentation of the green spaces? 	biodiversity
<p>Land and soil condition and pollutants To conserve Merton’s geodiversity and protect soils from development and over intensive use.</p>	<ul style="list-style-type: none"> • Will it safeguard soil quality and quantity? • Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non- designated sites? • Will it impact on existing networks of open spaces and create new green spaces? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Potential contaminated land • Existing use and buildings
<p>Sustainable land use To make the best and most efficient use of land to support sustainable patterns and forms of development.</p>	<p>Does it make a positive impact? Does it support positive sustainable patterns? Will, it brings disused sites into use, which benefits residents?</p>	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Vacant sites • Derelict sites • Potential options for future land uses
<p>Heritage (including architectural and archaeological heritage) To conserve and enhance the existing historic <u>and built</u> environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings. <u>through high quality design and protection of open space, valued views and historic assets.</u></p>	<ul style="list-style-type: none"> • Will it affect the significance of heritage assets through direct impacts or impacts on their setting? • Will the design enhance the local character? • Have, opportunities that make a positive contribution to the local character and area been identified? • Will it impact on any potential archaeological remains? • <u>Heritage assets at risk from neglect, decay,</u> 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Historic Parks and Gardens • Conservation Area(s) • Listed Building(s) • Archaeological Priority Areas • <u>Heritage assets at risk</u>

	<p><u>inappropriate development and air pollution?</u></p> <ul style="list-style-type: none"> • <u>Potential harm to the significance of heritage assets and wider historic environment through inappropriate development?</u> 	
<p>Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</p>	<ul style="list-style-type: none"> • Will the proposal be affected by flooding, i.e. is it within zone 2, 3a or 3b? • Will it lead to increased surface water flooding? • Will it lead to sewer flooding? • Will it impact or increase the risk of flooding to other people and property? • Will it promote and, include climate change adaptation, measures? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Location within flood zone • Surface water maps • Localised flooding maps, where available
<p>Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</p>	<ul style="list-style-type: none"> • Will it promote and include climate change adaptation, measures? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Noise and vibration To minimise noise, vibration levels and disruption to people and communities.</p>	<ul style="list-style-type: none"> • Will it impact on locations that are sensitive to noise pollution? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Water quality To protect and enhance Merton's water bodies.</p>	<ul style="list-style-type: none"> • Will it impact on water quality? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses

<p>Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</p>	<ul style="list-style-type: none"> • Will it impact on water quality? • Will it lead to increased surface water flooding? • Will it lead to sewer flooding? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</p>	<ul style="list-style-type: none"> • Will it increase or decrease public open space deficiency? • Will it lead to loss or degradation of designated spaces such as MOL (Metropolitan Open Land)? • Will it improve connectivity between existing open spaces? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Metropolitan Open Land • Historic Parks and Gardens
<p>Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</p>	<ul style="list-style-type: none"> • Will it increase access to essential services? • Will it assist in improve health and wellbeing? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Area of relative disadvantage • Access to essential services • Public open space deficiency • Town Centre Boundary • Public Right of Way
<p>Energy use To improve energy efficiency in new developments Increase renewable energy supply / provision.</p>	<ul style="list-style-type: none"> • Will it improve and reduce energy use? • Will it lead to more energy efficient uses? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Health and wellbeing. To facilitate and improve the health and wellbeing of the population, reduce health</p>	<ul style="list-style-type: none"> • Will it reduce the health inequalities in areas of poor health? • Will it improve mental health and wellbeing? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Areas of deprivation and inequalities

<p>inequalities and deliver safer and more secure communities.</p>		<ul style="list-style-type: none"> • Potential options for future land uses
<p>Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton’s demographic change and local housing demand</p>	<ul style="list-style-type: none"> • Will it increase the number of homes? • Will it increase the number of affordable homes? • Will it reduce the number of unsuitable/unfit homes? • Does it achieve Lifetime Homes Standard and increase accessibility for wheelchair users? 	<ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses • Conservation Areas • Public Health plans and strategies • Wider determinates of health • Areas of deprivation
<p>Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Areas of deprivation and inequalities • Potential options for future land uses
<p>Population demands and growth. To ensure that provision of environmental, social and physical infrastructure - managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.</p>	<ul style="list-style-type: none"> • Will it reduce the levels of socio-economic inequalities? • Will it ensure that developments such as housing and essential services meet demographic demands and growth? • Will it provide sustainable development that will reduce inequalities? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Areas of deprivation and inequalities • Local services/essential services • Predicted population projections. • Public Health England health profiles.

<p>Social inclusion and cohesion To ensure Merton has socially integrated communities which are strong, resilient and inclusive.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? • Will it reduce deprivation? 	<p>Analysis of: Disadvantaged areas/inequality</p>
<p>Design To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed, accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? • Will it reduce the use of the car? • Will it assist in building strong communities? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Disadvantaged areas/inequality • Potential options for future land uses
<p>Local employment To develop and maintain a healthy labour market.</p>	<ul style="list-style-type: none"> • Will it lead to the creation of jobs? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment data from NOMIS • Employment use • Disadvantaged areas/inequality
<p>Education and skills To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black and Asian Ethnic groups.</p>	<ul style="list-style-type: none"> • Will it impact on the local economy? • Will it lead to local economic growth? • Does it provide jobs? • Will it increase employment opportunities? • Will it increase training and skilled employment? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment use • Disadvantaged areas/inequality

<p>Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.</p>	<ul style="list-style-type: none"> • Will it improve business development? • Will it impact on the local economy? • Will it lead to local economic growth? • Does it provide jobs? • Will it meet local business needs? • Will the site/land use include commercial development? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment use • Town Centre Boundary • Area of Mixed Use
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6 Monitoring and mitigation

6.1 The SEA Regulations require that *“the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”* and that *the environmental report should provide information on “a description of the measures envisaged concerning monitoring”*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

6.2 Monitoring should focus on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before, any damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. In line with a precautionary approach, those SA objectives against which no significant adverse effects identified but uncertainty recorded have been included in the monitoring framework. Significant adverse effects and/or uncertain effects identified against all SA objectives apart from SA objectives (18), social inclusion.

6.3 The Local Plan as well as the baseline data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Where, uncertain impacts are identified against

the Sustainability Objectives, they be removed and further work undertaken as part of the planning application process. Specific attention should be given to the uncertain impacts identified when, reviewing development proposals, assessed as part of this SA/SEA. The specific mitigation measures must be provided in more and full detail at the planning application submission stage, to ensure that any adverse impacts are addressed. Monitoring of the impacts will be addressed through the Annual Monitoring Report (AMR).

- 6.4 Where appropriate, mitigation measures are strongly recommended to avoid, reduce or offset the potential adverse impacts of the Local Plan. In addition, potential opportunities to improve and enhance the social, economic and environmental receptors are identified. Development of the Local Plan is in parallel to SA process

Figure 10: Local Plan monitoring indicators

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
<p>Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</p>	<p>Number of days p.a. when air pollution is moderate or high for PM10*</p> <p><i>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre - more than 35 times a year at any measuring site.</i></p>	<p>Merton Council by way of Merton’s Annual Monitoring Report (AMR)</p>	<p>3 years</p>
<p>Biodiversity To protect and conserve Merton’s biodiversity from adverse development,</p>	<p>Changes of in areas of biodiversity importance.</p>	<p>Merton Council by way of Merton’s AMR (Authority Monitoring</p>	<p>3 years</p>

avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).		Report)	
Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Environment Agency and Merton Council by way of Merton's AMR	Every year
Sustainable land use To make the best and most efficient use of land to support sustainable patterns and forms of development.	Planning permission grant and completed	Merton Council by way of Merton's AMR	Every year
Heritage (including architectural and archaeological heritage) To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.	Number of heritage assets at risk of from neglect, decay, inappropriate development and environmental impact such as air quality.	Merton Council by way of Merton's AMR (Authority Monitoring Report)	Every year
Flood risk management To manage the risk of flooding from all	Number of planning permissions granted	Environment Agency and Merton Council by	Every year

sources and improve the resilience of people and property to flooding.	contrary to Environment Agency advice. <u>Number and location of Environment Agency flood warnings issued across Merton each year.</u>	way of Merton's AMR.	
Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Reduction in carbon emissions from new build developments	Merton Council by way of Merton's AMR.	Every 3 years
	Reporting on carbon offsetting proposed where on site reduction is not achievable.	Merton Council by way of Merton's AMR and Infrastructure Funding Statement	Annually
Noise and vibration To minimise noise, vibration levels and disruption to people and communities.	An increase in areas of the Noise action planning important areas.	Defra	3 years
Water quality To protect and enhance Merton's water bodies.	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds. River water bodies classified under the	Environment Agency and Merton Council by way of Merton's AMR	Every year

	Water Framework Directive to achieve good ecological status.		
Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds. <u>Number and location of water pollution incidents reported to the Environment Agency across Merton annually.</u> <u>Water quality status of water bodies across</u>	Thames Water and, Sutton and East Surrey Water companies.	3 years
	Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.	Merton Council by way of the AMR	
Open space and nature To protect, connect and enhance Merton natural environment (including important	The proportion of net loss open space for development apart for educational	Merton Council by way of the AMR	Every year

habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	establishments. <u>Metres of main river improved and restored across Merton</u> <u>Biodiversity Net Gain delivered across Merton.</u>		
Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	The proportion of journeys made by public transport and sustainable mode of travel. Increase in footfall at bus stops, underground, tram stops and railway stations.	Merton Council and Transport for London (TfL) by way of the AMR	3 years
Energy use To manage and reduce demand for energy.	Average percentage improvement over Part L of the Building Regulations	Merton Council by way of the AMR	2 years
Health and wellbeing. To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Delivery of healthcare facilities identified in Merton's Local Plan Number of people taking up physical activities and stating	Merton Council, Merton Public Health, CCG (Clinical Commissioning Groups) and other health and wellbeing	3-5 years

	they are in 'good health.'	partners.	3- 5 years.
	Number of Health Impact Assessments carried out and type of development.	Merton Council and Merton Public Health	
Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand	Progress against borough wide affordable housing target Number of homes built	Merton Council by way of the AMR	Annually
Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.	Number of Health Impact Assessments carried out and type of development.	Merton Council and Merton Public Health	3 years
Infrastructure To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.	Number and of healthcare provision The number of pharmacies and any gaps in provision in the borough.	Infrastructure Delivery Plan (live document) Public Health, Pharmacy Needs Assessment	Annually 5 years

<p>Design To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</p>	<p>Increase number of major schemes reviewed by the Design Review Panel at pre – application stage.</p>	<p>Merton Council by way of the AMR</p>	<p>Annually</p>
<p>Local employment To develop and maintain a healthy labour market.</p>	<p>Number of people unemployed Number of new jobs created.</p>	<p>Merton Council, Merton Chamber of Commerce and Jobcentre Plus</p>	<p>Every year</p>
<p>Education and skills To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.</p>	<p>Deliver to meet statutory delivery to secure sufficient school places. Number of 16- 24-year-olds in training or apprenticeships or work programmes Number of people employed or in training as part of large or regeneration developments.</p>	<p>Merton Council by way of the AMR</p>	<p>Every year</p>
<p>Economic growth and town centres To increase the vitality and viability of</p>	<p>Maintain the retail vacancy rate below national and</p>	<p>Merton Council by way of the AMR</p>	<p>Every year</p>

existing town centres, local centres and parades.	regional rates.		
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7 Strategic Environment Assessment

Figure 11: Checklist of SEA requirements contained in the SA Report

Environmental Report requirements	Section of this report
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Sections Scoping report
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Appendix A and figure 6.
c) the environmental characteristics of areas likely to be significantly affected;	Appendix A.
d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive);	Section 12
e) the environmental protection objectives, established at international, Community or	Section 12 of this report and SA/SEA 2018 onwards.

	Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	
f)	The likely significant effects on the environment, including 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 the interrelationship between the above factors;	Section 17-19 of this report and previous SA/SEA
g)	the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 20 of this report
h)	an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 16,
i)	a description of the measures envisaged concerning monitoring in accordance with Article 10;	Monitoring sections of each SA/SEA. Section 6 of this report.
j)	A non-technical summary of the information provided under the above headings.	Non-technical summary in this report.
k)	Consult responsible environmental	Scoping report

<p>authorities when deciding on the scope and level of detail of the information which must be included in the environmental report (Article 5.4)</p>	
<p>l) Consult with responsible environmental bodies and the public on the draft plan and the environment report before the plan is adopted (Article 6)</p>	<p>Yes, each consultation stage start in 2018.</p>
<p>m) Take into account the Environmental Report and consultation responses during the preparation of the plan before it is adopted (Article 8)</p>	
<p>n) When a plan is adopted Responsible Environmental bodies and the public and other relevant bodies will be informed of (Article 9): a) the plan is adopted b) a statement summarising how environmental consideration have been integrated into the plan, how any consultation responses have been taken into account and the reasons for choosing the plan as adopted. c) the measures for monitoring (Article 9)</p>	<p>Will be undertaken in accordance with Regulations following adoption</p>

8 Conformity to national and regional planning policies

- 8.1 The London Plan is legally part of each London, Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. All Development Plan Documents and Neighbourhood Plans have to be 'in general conformity' with the London Plan.
- 8.2 The London Plan seeks to develop an approach tailored for London to reflect the particular circumstances in the capital, and will act as the key document shaping planning decisions across Greater London. It provides an appropriate spatial strategy that plans for London's growth in a sustainable way. The London Plan apportions each London borough with a share of London's new homes via housing targets. Therefore, boroughs need to demonstrate that they can deliver their share but they do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can deliver homes above these figures whilst remaining in line with the strategic policies established in this Plan.
- 8.3 The London Plan is part Merton's statutory Development Plan. The policies are drafted in a way that allows London to implement this ambitious London Plan as soon as possible. There is no requirement for the policies to be repeated at the local level. However, in some instances a local approach is required within the context of the overall policy. The London Plan clearly sets out where this is the case.
- 8.4 The need for local authorities to be in conformity with national and regional planning policies sets the context of planning policies at a local level. Thus, in turn can limit the reasonable alternative(s) a borough can pursue. Any deviation from national and regional policy must be supported by robust evidence, which shows a just reason for the deviation. A planning inspector would examine this evidence. It would be for the inspector to determine if a deviation is just, based on the evidence and planning

policies and legislation. Only, then could a local authority adopt the approach once the whole plan has been examined and adopted.

8.5 A fundamental aspect of developing local planning policies is evidence. The Council has produced a number of evidence-based studies, which, have in turn informed and influence the local planning policies.

9 Sustainability Appraisal main modifications

9.1 Any significant changes because of modifications during the Local Plan examination will be assessed and included as a revision to this Sustainability Appraisal Report. Following, adoption and in accordance with the requirements of the SEA Directive, the Council will prepare a sustainability statement setting out:

- How sustainability considerations have been integrated into the local plan
- How the Sustainability Appraisal Report has been taken into account in the local plan
- How opinions expressed in response to public consultation have been taken into account
- The reasons for choosing the local plan as adopted, in the light of the other reasonable alternatives dealt with.
- Measures to be taken to monitor the significant environmental effects of the implementation of the local plan.

10 Conclusion

10.1 The conclusions of the SA/SEA are generally positive, with none of the measures in the Local Plan likely to have any known negative effects, either minor or significant. The principal reason for this is that the overriding purpose of the plan to minimise

the risk to human health and life, the environment, economic activity, infrastructure and cultural heritage. It takes a pro-active approach and is a clear consideration to integrate environmental issues and opportunities into the objectives of the Local Plan.

10.2 Overall, it is considered that the Local Plan provides a good policy framework in accordance with sustainable development principles.

Technical report

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

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

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

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

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

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

11.7 The sustainability appraisal should only focus on what ‘is needed’ to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is appropriate for the content and level of detail in the Local Plan.

12 Review of other plans

12.1 A review of plans was first carried out in the [Scoping Report](#) (November 2018) and has, continued to be reviewed at each stage of the SEA/SA process.

Figure 12: Review of plan

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

Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)	
Conservation of Wild Birds (Directive 79/409/EEC)	
Energy Performance of Buildings (EU Directive 2002/91/EC)	
Energy Efficiency (Directive 2012/27/EU)	
Floods Directive (EU Directive 2007/60/EC)	
Landfill Directive 1999/31/EC	
Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)	
Renewable Energy (EU Directive 2009/28/EC)	
Strategic Environmental Assessment (SEA Directive 2001/42/EC)	
Urban Wastewater Directive (91/271/EEC)	
Waste Framework Directive 75/442/EEC	
Water Framework Directive (EU Directive 2000/60/EC)	
National Regulations	
Emerging Planning reforms –White Paper	
Use class order 2020.	
Air Quality Standards Regulations (2010)	<p>Regulation replace the Air Quality Standards Regulations 2007 implement the following Directives: Directive 2008/50/EC on ambient air quality and cleaner air for Europe (this Directive replaces Council Directive 96/62/EC on ambient air quality assessment and management, Council Directive 1999/30 EC (European Commission) relating to limits for sulphur dioxide, nitrogen dioxide, oxides of nitrogen, particulate matter and lead in ambient air.</p> <p>Council Directive 2000/69/EC relating to limit values for benzene and carbon monoxide in ambient air, Council directive 2002/3/EC relating to ozone in ambient air.) Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air.</p>
Conservation of Habitat and Species	The Conservation of Habitats and Species Regulations 2017 (the “Habitats Regulations”)

Regulations, 2017	transposes the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives)
Building Regulations: England and Wales (Part L – Conservation of Fuel and Power, 2010) and (Part G Sanitation, hot water safety and water efficiency, 2010)	Part L – Conservation of fuel and power. The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect on 1 October 2010 and provide practical guidance on ways of following the energy efficiency requirements and regulation 7 of the Building Regulations 2010 (SI2010/2214) for England and Wales. The 2010 edition of Approved Document G - Sanitation, hot water safety and water efficiency, has been updated to incorporate amendments made to reflect any changes arising because of the Building Regulations 2010 and replaces the previous edition of Approved Document G - Sanitation, hot water safety and water efficiency.
<u>Building Safety Bill 2021-22, (currently passing through Parliament)</u>	<u>The Building Safety Bill contains a series of reforms to building safety. It incorporates the most substantial legislative response to the Grenfell Tower fire in 2017.</u>
Climate Change Act (2008) The Climate Change Act 2008 (2050 Target Amendment) Order 2019	The Climate Change Act aim is to manage and responding to climate change in the UK. Legislation requiring the government to reduce the UK's net emissions of greenhouse gases by 100% relative to 1990 levels by 2050
Community Infrastructure Levy Regulations 2010 (and subsequent amendments)	The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area.

Deregulation Act 2015	<p>The Deregulation Act provides for the removal or reduction of burdens on businesses, civil society, individuals, public sector bodies and the taxpayer. As far as are practicable all necessary technical housing standards should now be included in the main building regulations rather than within development plans. The act provides for an amendment to be made to the Planning and Energy Act 2008. Section 1(1)(c) of that Act provides that local planning authorities may include in their plan's requirements that development in their area meets higher standards of energy efficiency than are required by building regulations. The government policy meanwhile is that new dwellings meet a zero-net carbon emissions standard from 2016. Building regulations should also provide for optional requirements. Local planning authorities will be able where circumstances justify it, to make it a condition of planning permission for developments that they comply with one or more such optional requirements, which will then apply to the development as building regulations requirements and be inspected and enforced as such.</p>
Energy Act 2008	<p>The Energy Act 2008 updates energy legislation to:</p> <ul style="list-style-type: none"> reflect the availability of innovative technologies and emerging renewable technologies correspond with the UK's changing requirements for secure energy supply protect our environment and the taxpayer as the energy market changes
Environment Bills 2021/22 (pending)	<p>The Bill aims to:</p> <ul style="list-style-type: none"> • Increase local powers to tackle sources of air pollution. • Protect nature and improve biodiversity by working with developers. • Extend producer responsibility, ensure a consistent approach to recycling, introduce deposit return schemes, and introduce charges for specified single use plastic items. • Secure long-term, resilient water and wastewater services, including through powers to direct water companies to work together to meet current and future demand.

The government's 25-year Environment Plan	A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation.
National Flood and Coastal Erosion Risk Management Strategy for England (2020)	<p>The strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.</p> <p>Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change.</p> <p>Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.</p> <p>A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to take action.</p>
EA2025 action plan	<p>The Environment Agency vision for the future into action. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> • a nation resilient to climate change • healthy air, land and water • green growth and a sustainable future.
Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts.

Environmental Noise (England) Regulations 2006 (as amended)	The regulations move the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.
Flood and Water Management Act 2010	<p>The Act updates legislation to ensure; better protection from flooding, manage water more sustainably, improve public services and secure water resources during periods of drought. The Flood and Water Management Act gives local authorities new responsibilities. There now classed as lead local flood authorities (LLFAs) who have responsibilities for managing local flood risk in their area. The responsibilities of a LLFA (Lead Local Flood Authority) include:</p> <ul style="list-style-type: none"> prepare and maintain a strategy for local flood risk management in their areas, co-ordinating views and activity with other local bodies and communities through public consultation and scrutiny, and delivery planning maintain a register of assets – these are physical features that have a significant effect on flooding in their area investigate significant local flooding incidents and publish the results of such investigations establish SUDS approval bodies (SABs) that will be responsible for the approval of design, build and adoption of SUDS issue consents for altering, removing or replacing certain structures or features on ordinary watercourses play a lead role in emergency planning and recovery after a flood event
Flood Risk and Coastal Change, 2014	Advises how to take account of and address the risks associated with flooding and coastal change in the planning process.
Flood Risk Assessments: Climate Change Allowances, 2017	The Flood Risk Assessments: Climate Change Allowances advice updates previous climate change allowances to support NPPF. The Environment Agency (EA) has produced it as the government’s expert on flood risk.

Growth and Infrastructure Act 2013	The Act sets out reforms intended to reduce red tape, that the government considers hampers business investment, new infrastructure and job creation.
Housing and Planning Act 2016	Through this Act, the Government aims to take forward proposals to build more homes that people can afford, give more people the chance to own their own home and ensure the way housing is managed is improved. The Act seeks to achieve this in part, by implementing reforms that will make sure that the planning system does not add any unnecessary obstacles to the delivery of new homes. The Act includes provision for the delivery of Starter Homes and Social Housing. The Act also provides for “permission in principle” (“PIP”) for housing led development, which will provide developers with greater certainty of consent at an earlier stage in the development cycle.
Local Government White Paper: Strong and Prosperous Communities (2009)	The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship between central government, local government and local people.
Natural Environment and Rural Communities Act (2006)	The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy. The Act is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.
Planning and Compulsory Purchase Act (2004)	The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government’s policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.

<p>Planning and Energy Act (2008)</p>	<p>This Act allows local councils to set targets in their areas for on-site renewable energy, on site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.</p>
<p>Planning Act (2008)</p>	<p>The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new streamlined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the town and country planning system and the introduction of a Community Infrastructure Levy (CIL).</p>
<p>Localism Act (2011)</p>	<p>The Localism Act takes power from central government and hands it back to local authorities and communities giving them the freedom and flexibility to achieve their own ambitions. There are five key measures in the Localism act:</p> <ul style="list-style-type: none"> Community Rights Neighbourhood Planning Housing Empowering cities and other local areas General power of competence <p>Dissimilar parts of the Act will come into effect at separate times.</p>
<p>National Planning Policy Framework (2019 and 2021 draft), NPPF draft 2021, National Planning Policy for Waste (2014) and National Planning Practice Guidance (2021)</p>	<p>The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. At the heart of the NPPF is a presumption in favour of sustainable development. For plan making this means that:</p> <p>local planning authorities should positively seek opportunities to meet the development needs of their area.</p>

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

<p>(Environmental Impact Assessment) (England and Wales) Regulations 1999</p>	<p>when deterring planning permission applications.</p>
<p>The Town and Country Planning (Environmental Impact Assessment) Regulations 2011</p> <p>And Amendment 2015</p>	<p>These Regulations replace the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI No. 293) (“the 1999 Regulations”) and subsequent amending instruments. The Town and Country Planning (Environmental Impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales. These regulations provide a consolidation of the 1999 regulations to reflect amendments to the EIA (Environmental Impact Assessment) directive and recent case law.</p>
<p>The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995</p>	<p>These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.</p>
<p>The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2010</p>	<p>This order amends the GDPO 1995 in relation to:</p> <ul style="list-style-type: none"> • Design and access statements • Publicity of planning applications • Time limits for lodging certain planning appeals • Provisions to include on the planning register applications for non-material amendments
<p>The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012</p>	<p>The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country Planning (General Permitted Development) Order 1995 (“GPDO”) by:</p> <p>adding a new Part 43 to Schedule 2 to introduce permitted development rights for solar panels, ground and water source heat pumps, and flues forming part of biomass and</p>

	<p>combined heat and power systems installed on non-domestic premises inserting new paragraphs into Parts 6 and 7 of Schedule 2 to clarify that permitted development rights can apply under those Parts to structures to house biomass boilers, anaerobic digestion systems and associated waste and fuel stores, and hydro turbines installed on agricultural and forestry units, and amending paragraph J of Part 40 of Schedule 2 (interpretation of Part 40) to delete the words “product and installation” from the definition of “MCS Planning Standards”.</p>
The Town and Country Planning (Local Planning) (England) Regulations 2012	<p>The Regulations (a) consolidate the existing Town and Country Planning (Local Development) (England) Regulations 2004 and the amendments made to them; and (b) make new provision and amendments to take account of the changes made by the Localism Act 2011.</p>
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010	<p>This amendment introduces a definition of houses in multiple occupation into the Use Classes Order.</p>
The Water Resources Act 1991 (Amendment) E&W Regulations 2009	<p>This Act aims to prevent and minimise pollution of water. The Environment Agency are responsible for ensure the Act is enforced. Under the act it is an offence to cause or knowingly permit any poisonous, harmful or polluting material, or any solid waste to enter any controlled water. Silt and soil from eroded areas are included in the definition of polluting material. If eroded soil is found to be polluting a water body or watercourse, the Environment Agency may prevent or clear up the pollution and recover the damages from the landowner or responsible person.</p>
The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)	<p>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 consolidate, revoke and replace the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003.</p> <p>The regulations aim to set out the provisions of the Directive in more detail rather than cross-referencing extensively to the Water Framework Directive (WFD).</p>

The Water Act 2003	<p>The four broad aims of the Act are:</p> <ul style="list-style-type: none"> • the sustainable use of water resources. • strengthening the voice of consumers. • a measured increase in competition; and • the promotion of water conservation.
National: strategies /plans/ publications	
Air Quality Strategy DEFRA 2007	The strategy sets out air quality objectives and policy options to further improve air quality in the UK. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment.
Air Pollution: Action in a changing Climate 2010	This document does not replace the current air quality strategy but accounts for the rapid development of climate change policy since the strategy was published in 2007.
Ancient Monuments and Archaeological Areas Act 1979	Ancient Monument Acts legislating to protect the archaeological heritage of England & Wales and Scotland. Northern Ireland has its own legislation.
UK Post 2010 Biodiversity Framework	The Framework succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach' and is the result of a change in strategic thinking. The Framework demonstrates how the work of the four countries and the UK contributes to achieving the Aichi Targets, and identifies the activities required to complement the country biodiversity strategies in achieving the Targets.
Natural England's – England Biodiversity (2002)	England Biodiversity Strategy, published in 2002. It brings together England's key contributions to achieving the 2010 target to halt biodiversity loss. It also seeks to make biodiversity part of mainstream thinking and emphasises that healthy, thriving and diverse ecosystems are essential to everybody's quality of life and wellbeing. The Strategy has five themes:

	<ul style="list-style-type: none"> ● Protecting the best wildlife sites ● Promoting the recovery of declining species and habitats ● Embedding biodiversity in all sectors of policy and decision making ● Enthusing people ● Developing the evidence base. ● An important aim of the strategy is to deliver the UK Biodiversity Action Plan in England, and a measure of success of conserving England’s biodiversity is how the status of priority species and habitats is changing.
<p>Biodiversity 2020: A strategy for England’s wildlife and ecosystems 2011</p>	<p>Provides a comprehensive picture of how the international and EU commitments are being implemented. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The strategy aims to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.</p>
<p>Securing the Future: UK (United Kingdom) Sustainable Development Strategy (2005)</p>	<p>This sets out the national framework for Sustainable Development based on 4 central aims:</p> <ul style="list-style-type: none"> social progress which recognises the needs of everyone effective protection of the environment prudent use of natural resources maintenance of high and stable levels of economic growth and employment <p>The strategy sets five guiding principles to achieve sustainable development:</p> <ul style="list-style-type: none"> living within environmental limits ensuring a strong, healthy and just society achieving a sustainable economy

	<p>promoting good governance</p> <p>using sound science responsibly</p>
Sustainable Construction Strategy (2008)	<p>This Strategy is aimed at providing clarity around the existing policy framework and the future direction of Government policy. It aims to realise the shared vision of sustainable construction by:</p> <p>Providing clarity to business on the Government's position by bringing together diverse regulations and initiatives relating to sustainability</p> <p>Setting and committing to higher standards to help achieve sustainability in specific areas</p> <p>Making specific commitments by industry and Government to take the sustainable construction agenda forward</p>
UK Low Carbon Transition Plan (2009)	<p>The low carbon transition plan sets out how the government is to meet its binding carbon budget of an 18% cut in emissions on 2008 levels by 2020 (34% on 1990 levels). It also allocated individual carbon budgets for the major UK government departments, which are expected to produce their own plans.</p>
Carbon Plan 2011	<p>The Carbon Plan was published in December 2011 and sets out the Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the 2050 target. This publication brings together the Government's strategy to curb greenhouse gas emissions and deliver our climate change targets, as well as the updated version of our actions and milestones for the next five years; replacing the draft Carbon Plan published in March 2011. Part 1, 2 and 3 of the report, Annex A and Annex B set out the Government's strategy for delivering carbon budgets and fulfil the legal obligation to report on what the UK is doing to ensure it meets carbon budgets set in law. Annex C of this report sets out, department by department, actions and deadlines for the next five years.</p>
Energy Efficiency Strategy: The Energy	<p>This is an Energy Efficiency Strategy to maximise existing policy and realise the wider</p>

Efficiency Opportunity in the UK (DECC 2012)	energy efficiency potential that is available in the UK economy.
Estate Regeneration National Strategy - Good Practice Guide Part 1, DCLG December 2016	<p>The estate regeneration good practice guide sets out key considerations for schemes at the preliminary stages and a model process for successful regeneration. The guide is for all stakeholders in estate regeneration schemes for example landowners, residents, local authority officers and members, consultants, developers, public service providers, businesses and charities. It should be read in conjunction with the other components of the estate regeneration national strategy, including guidance on resident engagement and protection, finance and delivery.</p> <p>The guide sets out the principal activities, considerations, key participants and source material for typical regeneration projects at the preparation, planning or delivery stages of projects. This guidance does not intend to set out a list of mandatory requirements for estate regeneration schemes. It is intended as a general good practice guide for all stakeholders to consider in relation to the characteristics and challenges of each individual scheme.</p>
Laying the Foundations: A Housing Strategy for England (2011)	<p>A radical new strategy to reignite the housing market and get the nation building again was launched on 21 November by the Prime Minister. The Housing Strategy sets out a package of reforms to get the housing market moving again; lay the foundations for a more responsive, effective and stable housing market in the future; support choice and quality for tenants; improve environmental standards and design quality.</p> <p>The new strategy addresses concern across the housing market making it easier to secure mortgages on new homes, improving fairness in social housing and ensuring homes that have been left empty for years are lived in once again.</p>
The government's 25-year Environment Plan	A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation.

National Flood and Coastal Erosion Risk Management Strategy for England (2020)	<p>The strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.</p> <ul style="list-style-type: none"> • Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change. • Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure. <p>A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action</p>
EA2025 action plan	<p>The Environment Agency vision for the future into action. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> • a nation resilient to climate change • healthy air, land and water • green growth and a sustainable future.
Environmental Assessment of Plans and Programmes regulations 2004	<p>Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts.</p>
Healthy lives, healthy people: our strategy for public health in England 2010 and update	<p>The strategy sets out a bold vision for a reformed public health system in England including:</p>

2011	<ul style="list-style-type: none"> • Local authorities to take new responsibilities for public health • Local authorities to be supported by a new integrated public health service such as Public Health England • A stronger focus to be placed on outcomes across the system • Public health as a clear priority and a core part of business • A commitment to reduce health inequalities.
DEFRA Sustainable Drainage Systems Non-Statutory Technical Standards for Sustainable Drainage Systems 2015	This document sets out non-statutory technical standards for sustainable drainage systems. They should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance.
Resources and waste strategy for England (December 2018)	strategy sets out how we will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England
Serious and organised crime (2018 review)	A review of serious and organised waste crime and its effects, making recommendations on a strategic approach to waste crime.
National Guidance and other Reference Documents	
Building Research Establishment Environmental Assessment Method (BREEAM)	
Environment Agency: Creating a better place. Our corporate strategy (2010-2015)	
Environment Agency: Climate Change, adapting for tomorrow (2009)	
Environment Agency: Water for people and the environment. Water resources strategy for England and Wales (2009)	
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)	
English Indices of Deprivation (2015)	
National Heritage Protection Plan (2015-18)	

Guidance on Tall Buildings CABE (Commission for Architecture and the Built Environment) and English Heritage (2007)	
Model Procedures for the Management of Contaminated Land-Environment Agency.	
Regional: Plans/strategies	
Clearing London's Air: Air Quality Strategy (2010)	The strategy sets out a framework for improving London's air quality and measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues.
The Control of Dust and emission during construction and demolition (2014) SPG (Supplementary Planning Guidance)	The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London. It also aims to control nitrogen oxides (NOx) from these same activities by introducing an Ultra-Low Emissions Zone (ULEZ) for non-road mobile machinery.
Accessibility and Equity	
Equal Life Chances for All framework (2014)	The Equal Life Chances for All framework 2014 highlights the Mayor's commitment to tackling inequality; improving life chances and removing barriers that prevent people from reaching their full potential.
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2014)	This provides detailed guidance on the policies contained in the London Plan to make places usable by everyone especially disabled people.
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)	This SPG provides guidance to London boroughs, partners and developers on the implementation of policies in the London Plan, which relate to equalities issues and addressing the needs of London's diverse communities.
Climate Change and Energy	
Climate Change Mitigation and Energy Strategy	This strategy focuses on reducing CO2 emissions to mitigate climate change, securing a low carbon energy supply for London, and moving London to a thriving low carbon

(2011)	capital. It forms a central part of the Mayor’s goal of retrofitting London. The Mayor’s activity to achieve this is well underway. His programmes are already making real cuts in CO2 emissions, improving quality of life for Londoners, and creating economic opportunities for the capital.
Managing risks and increasing resilience: Climate Change Adaptation Strategy for London (2010)	<p>The Mayor’s Climate Change Adaptation Strategy:</p> <ul style="list-style-type: none"> • identifies who and what is most at risk today • analyses how climate change will change the risk of flood, drought and heatwave through the century • describes what action is needed to manage the changes and who is responsible <p>The key actions proposed in the strategy are:</p> <ul style="list-style-type: none"> • To improve our understanding and management of surface water flood risk • An urban greening programme to increase the quality and quantity of green space and vegetation in London which will buffer London from floods and hot weather • To retro fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes.
Be Seen Energy Monitoring Assessments Guidance (draft 2020).	This draft guidance provides further details on the ‘be seen’ stage of the energy hierarchy set out in the Mayor’s emerging London Plan which requires monitoring and reporting of the actual operational energy performance of buildings for at least five years post construction
Culture	
Cultural Strategy: Cultural Metropolis (2010)	The Mayor’s Cultural Strategy sets out his vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. The strategy recognises the

	<p>significance of the cultural and creative sectors in making London a successful world city and puts forward a case for its continued support and investment – particularly in the run up to the 2012 Olympics and the opportunity it presents for London to undertake a step change in cultural activity and participation.</p>
<p>Economy and skills</p>	
<p>Mayors Economic Development Strategy (2010)</p>	<p>The Mayor’s vision is for London to be the best big city in the world. The Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor’s ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world’s leading low carbon capitals, for all Londoners to share in London’s economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.</p>
<p>Mayor’s Economic Development Strategy for London (2018)</p>	<p>Sets out the Mayor’s plans to grow London’s economy, support businesses, boost innovation and create a city that works for all.</p> <p>The draft strategy has three main goals:</p> <p>Opening opportunities: everyone should be able to benefit from all our city offers Growth: ensuring our economy will continue to thrive and is open to business Innovation: to make London a world leader in technology and a hub of innovative ideas and creativity</p>

<p>Skills Strategy (2018)</p>	<p>The strategy outlines plan to create a post 16 technical and vocational education and skills system that meets the needs of Londoners and businesses.</p> <p>It also calls on London’s businesses, of all sizes and sectors, to outline what they need and what they can contribute to build the workforce of the future.</p>
<p>A vision for a 24-hour city (2017)</p>	<p>This vision sets out the Mayor’s plan to turn London into a leading 24-hour global city, it focuses on building a night-time culture which:</p> <ul style="list-style-type: none"> promotes culture and leisure for all ages and interests increases opening hours ensures safety for residents, visitors and night-time workers works closely with boroughs and the police to create a balanced and sustainable night-time offer <p>These principles have been developed through conversations with businesses, the Night-time Economy Borough Champions, the police and many others.</p> <p>London at night will:</p> <ul style="list-style-type: none"> • Be a global leader. • Provide vibrant opportunities for all Londoners, regardless of age, disability, gender, gender identity, race, religion, sexual orientation or means. • Promote all forms of cultural, leisure, retail and service activity. • Promote the safety and wellbeing of residents, workers and visitors.

	<ul style="list-style-type: none"> ● Promote welcoming and accessible nightlife. ● Promote and protect investment, activity and entrepreneurship. ● Promote domestic and international visits to London. ● Be strategically found across London to promote opportunity and minimise impact. ● Become a 24-hour city that supports flexible lifestyles. ● Take account of future global and domestic trends in leisure, migration, technology, employment and economics.
<p>Environment</p>	
<p>London Environment Strategy (2018)</p>	<p>The strategy sets out the Mayor’s approach to tackling some of the environmental challenges facing London. Toxic air, noise pollution, the threat to green spaces, adverse effect of climate change which all pose a major risk to health and wellbeing of Londoners.</p> <p>This is the first strategy to bring together approaches to every aspect of London’s environment. It is divided into the following areas:</p> <ul style="list-style-type: none"> ● Air quality ● Green infrastructure ● Climate change mitigation and energy ● Waste ● Adapting to climate change ● Ambient noise
<p>Flood Risk</p>	

Regional Flood Risk Appraisal (2009)	The Mayor published the Regional Flood Risk Appraisal (RFRA) in October 2009. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed. The RFRA has 19 recommendations, involving or lead by a range of organisations. Progress against the recommendations will be monitored annually in the London Plan Annual Monitoring Report.
Mayor of London: Regional Flood Risk Appraisal (2014)	The Regional Flood Risk Appraisal (RFRA) provides an overview of all sources of flooding in London and addresses its probability and consequences.
The Thames Estuary 2100 Plan (2012)	Recommends how to manage tidal flood risk to the end of the century and beyond. The plan sets out how 1.25 million people and £200 billion worth of property will continue to be protected from tidal flood risk.
Thames River Basin Management Plan (2009)	<p>The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) to promote the concept of sustainable water management. The aims of the plan are:</p> <ul style="list-style-type: none"> • To safeguard the sustainable use of water • To protect and restore the status of aquatic ecosystems • To improve aquatic environments by the reduction of hazardous substances • To reduce groundwater pollution • To help mitigate the effects of flood and droughts
Health	
Better Health for All Londoners: London health inequalities strategy (2018)	<p>The strategy sets out the Mayor’s framework to reduce health inequalities in the capital. The strategy has five aims:</p> <p>Healthy children: every child in London child to have a healthy start</p> <p>Healthy minds: for all Londoners to share in a city with the best mental health in the world</p> <p>Healthy places: for all Londoners to benefit from a society, environment and economy that promotes good mental and physical health.</p>

	<p>Healthy communities: for London’s diverse communities to be healthy and thriving. Communities that are better connected and engaged are more socially integrated. They are also healthier.</p> <p>Healthy habits: to ensure that the healthy choice is the easy choice for all Londoners. The combination of smoking, excessive drinking, physical inactivity and an unhealthy diet is too common in some communities, leading to health problems.</p>
<p>NHS (National Health Service) London: Strategic Plan (2008-13)</p> <p>A new 2021 plan is currently being drafted.</p>	<p>A strategic plan that sets out an ambitious programme of work to deliver high-quality, value for money services.</p>
Heritage	
<p>Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment – English Heritage (2010)</p>	<p>The guidance focuses on SEA/SA for development plans, including neighbourhood plans; it is equally applicable to the preparation of SEA/SAs for other types of documents such as Local Transport Plans and Water Resource Management Plans.</p>
<p>Historic England’s Heritage at Risk Register London (2011)</p>	<p>Identifies listed buildings at risk from neglect, decay, under use or redundancy in London.</p>
Housing	
<p>Good Quality Homes for All Londoners Guidance Draft (2020)</p>	<p>The draft Good Quality Homes for All Londoners guidance: a suite of documents that provides guidance on ensuring land is used in the best way to deliver the right quantity of new housing, at the right quality, in the right place, embedding high-quality design at the centre of housing delivery.</p>
<p>London Housing Strategy (2014)</p>	<p>The overriding aims of this strategy are to increase the supply of housing of all tenures</p>

	<p>and to ensure that these homes better support London's continued economic success. The strategy is not just about supply; policies range from improving the existing stock to tackling rough sleeping – but supply is at the heart of it, underpinning each of its five key priorities.</p>
<p>London Housing Strategy (2018)</p>	<p>The aim of the strategy is to address the housing shortage through an intensive use of London's available land, focusing on more genuinely affordable housing and providing help now for people feeling the effects of the housing crisis - from private renters to rough sleepers.</p> <p>This Strategy has five key areas:</p> <ul style="list-style-type: none"> • Building more homes for Londoners • Delivering genuinely affordable homes • High quality homes and inclusive neighbourhoods • A fairer deal for private renters and leaseholders • Tackling homelessness and helping rough sleepers
<p>GLA (Greater London Authority) Housing Design Guide (2010)</p>	<p>The new 'interim edition' of the London Housing Design Guide sets out the Mayor of London's aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.</p>
<p>Housing Mayor's Supplementary Planning</p>	<p>This draft document sets out proposed guidance to supplement the housing policies in the 2011 London Plan (LP). The SPG is informed by the Government's draft National</p>

Guidance (2012)	Planning Policy Framework and by its new Housing Strategy for England.
Affordable Housing and Viability SPG (2017)	The draft SPG provides guidance to ensure that policy is as effective as possible. It does not and cannot introduce new policy. The SPG's main aim is to speed up planning decisions and increase the amount of affordable housing delivered through the planning system. Importantly, it will help embed the requirement for affordable housing into land values and make the viability process more consistent and transparent, as well as speeding up the planning process for those schemes which are delivering more affordable homes. The guidance set out the preferred approach for all schemes of ten units or more.
Housing Standards (2016)	Minor alterations to the London Plan on Housing Quality and Design, Housing Choice, Sustainable Design and Construction, Water Use and Supplies Policy and Lifetime Neighbourhoods Policy
Homes for Londoners: Good Practice Guide to Estate Regeneration (2018)	<p>The guidance is aimed at local authorities and housing associations, covering three key issues:</p> <ul style="list-style-type: none"> Aims and objectives of estate regeneration. Consultation and engagement with residents. A fair deal for tenants and leaseholders. <p>Once adopted, the Guide is intended to reassure Londoners that they will be given real opportunities to shape estate regeneration, that engagement and consultation will be meaningful, and that offers of rehousing and compensation will meet guaranteed standards. The principles set out in this draft of the Guide should be read in conjunction with several other documents that address related issues in estate regeneration projects, covering everything from urban design principles to methods of procurement, as well as with statutory housing and planning policy documents.</p>

Infrastructure	
Social Infrastructure SPG (2015)	This document has guidance to support London Plan Policies on Social Infrastructure as set out in Chapter 5 of the London Plan. It particularly focuses on those elements of social infrastructure that face the biggest strategic challenges - specifically health, education, sport, faith and burials.
Central London Infrastructure Study (2009)	The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. As well as offering local authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate. This study also identifies existing gaps and shortfalls in infrastructure provision.
Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)	The guidance supports the implementation of the London Plan Policy S4 on 'Play and informal recreation.'
London Plan	
London Plan 2021	<p>Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor must produce a spatial development strategy (SDS) – which has become known as 'the London Plan' – and to keep it under review.</p> <p>The London Plan is:</p> <p>the overall strategic plan for London, setting out an integrated economic, environmental,</p>

	<p>transport and social framework for the development of London over the next 20–25 years.</p> <p>the document that brings together the geographic and locational (although not site specific) aspects of the Mayor’s other strategies – including those dealing with:</p> <ul style="list-style-type: none"> Transport Economic Development Housing Culture <p>a range of social issues such as children and young people, health inequalities and food</p> <p>a range of environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste</p> <p>the framework for the development and use of land in London, linking in improvements to infrastructure (especially transport); setting out proposals for implementation, coordination and resourcing; and helping to ensure joined up policy delivery by the GLA Group of organisations (including Transport for London)</p> <p>the strategic, London-wide policy context within which boroughs should set their detailed local planning policies.</p> <p>the policy framework for the Mayor’s own decisions on the strategic planning applications referred to the Mayor</p> <p>an essential part of achieving sustainable development, a healthy economy and a more inclusive society in London.</p>
Noise	
<p>London Agglomeration Noise Action Plan (2010)</p>	<p>The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction, if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the</p>

	results of the strategic noise maps published in 2008.
Sounder City: The Mayors Ambient Noise Strategy (2004)	The aim of the Mayor’s ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in and visiting London using the best available practices and technology within a sustainable development framework. Three key issues are: 1. Securing good noise reducing road surfaces 2. Securing a night aircraft ban across London 3. Reducing noise through better planning and design of new housing
Open Space, Biodiversity and environment	
London’s Natural Signatures: The London Landscape Framework (Natural England 2011)	The London Landscape Framework aims to support but also go beyond existing green space policy. The Natural Signatures are a means of encapsulating and evoking the key natural characteristics of the Natural Landscape Areas.
All London Green Grid March (2012)	<p>The All-London Green Grid takes the principles of the East London Green Grid and applies them across London.</p> <p>The concept of a “green grid” – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways – is at the centre of the London Plan’s approach to the provision, enhancement and management of green infrastructure (Policy 2.18). This network of spaces functions best when designed and managed as an interdependent ‘grid.’</p> <p>The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations and the economic and social uplift these supports.</p>

Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)	The document details the Mayor's vision for protecting and conserving London's natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space. The strategy is a key step in establishing a London-wide framework for supporting London's diversity of wildlife.
Public London Charter (draft 2020)	The Public London Charter sets out principles for the management and maintenance of public space to help ensure new public spaces are inclusive places, offering the highest level of public access and ensuring any rules or restrictions are only those that are essential for the safe management of the space.
Transport	
Mayors Transport Strategy (2018)	<p>The document sets out the Mayor's policies and proposals to reshape transport in London over the next two decades.</p> <p>Three key themes are at the heart of the strategy.</p> <p>Healthy Streets and healthy people: Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p> <p>A good public transport experience: Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <p>New homes and jobs: Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p>
Mayors Transport Strategy (2010)	The Mayor's Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as part of a strategic policy framework

	<p>to support and shape the economic and social development of London over the next 20 years. It sets out the Mayor’s transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision.</p>
<p>Transport for London: Transport Assessment Best Practice Guidance (2010)</p>	<p>The purpose of this document is to provide prominent level guidance to improve the process for TfL and its Land Use Planning Team (LUP) and it does not replace borough guidance on transport assessments.</p> <p>The guidance is relevant to developments that are deemed to be strategically important, and which are referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008.</p>
<p>Water</p>	
<p>Securing London’s Water Future (2011)</p>	<p>This is the first water strategy for London and provides a complete picture of the capital’s water needs. The strategy calls for organisations involved in the city’s water management to:</p> <ul style="list-style-type: none"> invest in a water management and sewerage system to ensure London has the water services fit for a world class city and create jobs. support and encourage Londoners to take practical action to save water, save energy and save on their utility bills (a standard package of water saving measures can save a household around 35,000 litres of water per year and £90 off their bills) realise the potential of London’s sewage as a clean energy resource to help reduce greenhouse gas emissions and improve energy security. work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London’s green spaces. <p>At the heart of the strategy is a six-point plan to reduce London’s water demand. At a time of decreasing supply and increasing demand for water, it makes sense to use the water we have more wisely. The strategy promotes increasing water efficiency and</p>

	reducing water expenditure to balance supply and demand for water, safeguard the environment and help tackle water affordability problems.
Taking Care of Water: Our Plan for the next 25 years (Thames Water Utilities 2007)	Taking care of water describes a long-term strategy to address a series of issues. It is built around the four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the impact on bills.
Water Resources Management Plan (Thames Water Utilities 2010-2035)	Sets out how demand for water is balanced against the supply over the next 25-year period.
Our Plans for Water (Thames Water Utilities 2010-2015)	A five-year Plan, which sets out proposals to maintain and improve services during the period 2010 to 2015.
Thames Water Recourse Strategy 2020	Sets out how Thames Water will manage water resources efficiently alongside developing new supplies of water.
Merton's Plans and strategies	
Community	
Merton's Sustainable Community Strategy	
Merton's Cultural Strategy – A Better Future for All 2007-10	
Economy	
Employment Land Study 2010	
Merton's Economic Development Strategy 2010 and Refresh 2012	

Merton's Employment and Skills Action Plan 2013-14
Energy and Climate Change
Climate Change Strategy 2020 and Action Plan (2021)
Carbon Assessment of Domestic Housing in London Borough of Merton 2010
Merton Climate Change Research: Town Centre Morden: CHP (Combined Heat and Power) Plant Option Appraisal 2010
Merton Climate Change: Renewable Energy Resources in Merton - A Preliminary Assessment 2009
Environment
Nature Reserve Management Plans (13 in total) 1997-2007
Thames Landscape Strategy 2012
Flood Risk
Strategic Flood Risk Assessment Level 1 (2020) and level 2 (pending 2020/21) – joint with London Borough of Wandsworth 2021
Local Flood Risk Management Strategy 2014
Preliminary flood Risk Assessment 2011
Health
Annual Public Health Report 2018
Joint Strategic Needs Assessment 2015 and the Merton Story (annually update to the JSNA)
The Health Needs Assessment: East Merton 2014

Pharmaceutical Needs Assessment 2019
Childhood Obesity Action Plan 2017
Food Poverty Plan 2018
Merton CCG (Clinical Commissioning Groups) Dementia Strategy (TBC) - (Five-year period) tbc
Health in All Policies (HiAP) (emerging)
Autism Strategy (emerging 2021)
Dementia Strategy (emerging 2021)
Design, Heritage and Archaeology
Merton's Conservation Area Character Assessments
Borough Character Study (2021) and Small Sites Toolkit (2021)
Basement and subterranean developments SPD (Supplementary Planning Document) (2019)
Shopfront design guide SPD (2017)
Housing
Affordable Housing Viability Study 2020
Housing Strategy 2012 -15
Housing Delivery Strategy (draft 2021)
Tenancy Strategy 2013

Merton's Older Person Housing Strategy 2008-12
Merton's Neighbourhood Renewal Strategy 2005-10
Strategic Housing Market Assessment 2019
Housing Market Assessment for the Estate Regeneration Areas, February 2017
Viability for the Estate Regeneration Areas, March 2017
Infrastructure
Infrastructure Projects (table 27.2 Core Planning Strategy)
Infrastructure Needs Assessment Study 2008
Infrastructure Delivery Plan (2021).
Merton's Indoor Sports Facility Study 2020
Merton's Playing Pitch Strategy 2019
Green Infrastructure, Open Space and Biodiversity
Merton's Green Infrastructure, Biodiversity and Open Space Study 2020
Merton's Playing Pitch Strategy 2019
Merton's Public Realm Strategy 2009
Merton's Allotment Strategy 2007-10
Borough's Sport, Open Space and Recreation Needs Assessment

Merton's Free Play Strategy 2007-2012
Wandle Valley Regional Park: A vision for the future update 2009
Planning
Core Planning Strategy 2011
Sites and Policies Plan 2014
Policies Map 2014
Pollution
Air Quality Action Plan 2018
Contaminated Land Strategy 2005
Transport
Local Implementation Plan for Transport 2019
COVID-19 Transport Strategy 2021
Waste
Draft South London Waste Plan 2021
South London Waste Plan 2012

Key findings from the review of plans analysis

12.2 All the plans and programmes listed above will influence Merton's new Local Plan to some degree. As a London borough,

a major influence will be the London Plan, as the spatial strategy for London and its supporting documents. ~~In addition, the Mayoral strategies, local adopted plans/strategies and evidence based studies.~~ The objectives contained within these documents will provide the direction for Merton Local Plan.

12.3

There is a clear hierarchy of plans and programmes in certain areas descending from the international/European and/or national level through to the local level. The implications for a Local Plan generally, tend to become more specific and precise at the local level and regional level. Several issues highlighted in the analysis of the plans and programmes, ~~and are~~ detailed in this report. It will be important that the Local Plan reflect this context and to incorporate the requirements of other plans and programmes as appropriate and for the Sustainability Appraisal to consider the sustainability implications during the appraisal process. The key findings from reviewing plans are set out below:

- Air quality: The urgent need to meet mandatory standards for air quality and cut the annual number of premature deaths from air pollution.
- Climate Change: The need to design buildings and spaces to adapt and mitigate the effects of climate change, including overheating, flooding, droughts and more extreme weather events and achieving zero net carbon emissions by 2050.
- Energy Use and Supply: Widening supply and demand gap. Greater efficiencies, use of renewable energy sources, and the importance of low carbon economy.
- Water resources and quality: identified need to focus on the protection, improvements and sustainable use of the water environment.
- Flood Risk: A need to ensure that developments are designed in a way that does not increase flood risk, to encourage the use of Sustainable Drainage Systems (SUDS) and that all elements of policy require review to ensure that flood risk is integrated with the management of the rest of London's environment.
- Natural Environment: Facilitating opportunities to integrate biodiversity and the network of green spaces to provide a range of sustainability benefits, i.e. healthy living, improving air, noise and water quality, cooling the urban environment, enhancing biodiversity and ecological resilience. Enhancing existing habitats and providing new areas for biodiversity as opportunities arise.
- Historic Environment: The importance of the social, cultural and economic benefits of the historic environment and the importance of conserving and enhancing designated and non-designated heritage assets and their settings.
- Geology and Soils: A need to focus on prevention and remediation of environmental damage, including land contamination. The need to increase efforts to reduce soil degradation and remediate contaminated sites.
- Materials and Waste: Need to apply principles of circular economy when aiming for waste reduction, reuse, re-

manufacturing and recycling in all construction.

- Noise and Vibration: A need to minimise noise and vibration levels and the number of people exposed to high levels of noise from development, activities and use.
- Sustainable Land Use: The need to ensure the most efficient use of land, which are in keeping with principles of sustainable development.
- Demography: Merton has predicted population growth and increasing aging population.
- Equality and Social Integration: Reducing inequalities and the promotion of inclusion and participation opportunities for those groups with protected characteristics to promote social integration and cohesion.
- Health and Health Inequalities: A need to improve the overall health and healthy life expectancy of Merton's residents.
- Housing: Significantly increase the delivery of housing, including a mix of size, tenures, choice and the delivery genuine affordable housing. In addition, the complexity of issues around barriers to housing delivery
- Crime, safety and security: The design of the built environment and the mix of activities can significantly affect fear and actual crime.
- Connectivity: Integration of land use and transport planning to ensure growth is sustainable and optimises connectivity throughout London. The green network also provides connections, which has many health and environmental benefits.
- Accessibility: The need for people to be able to easily and independently access jobs, housing, public spaces, education, public transport, healthcare and amenities and be able to easily and independently move around the built environment.
- Employment, training and skills: Employment growth in different sectors ensuring a diverse economy providing opportunities for all.
- Culture: Economic and social benefits of culture.
- Townscape, Landscape and Public Realm: The importance of creating and maintaining a safe, attractive and well-designed public realm which encourages people to walk and cycle, promoting a sense of place and reducing the need to travel to access services and amenities

13 Sustainable development

- 13.1 The term 'sustainable development' has been used in policy-making since 1987 following the publication of the World Commission on Environment and Development Report, 'Our Common Future', commonly referred to as the Brundtland Report. The report developed guiding principles for sustainable development, as it is, understood today and contained the following definition: "*development that meets the needs of the present without compromising the ability of future generations to meet their own needs*".
- 13.2 The UK Sustainable Development Strategy (ODPM5, 2005) defines sustainable development as "enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations". The Strategy is, based on the following guiding principles:
- 1) **Living within Environmental Limits** Respecting the limits of the planet's environment, resources and biodiversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.
 - 2) **Ensuring a Strong, Healthy and Just Society** Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion and creating equal opportunity for all.
 - 3) **Achieving a Sustainable Economy** Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them, and efficient resource use is, incentivised.
 - 4) **Using Sound Science Responsibly** Ensuring policy is developed and implemented based on strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.
 - 5) **Promoting Good Governance** Actively promoting effective, participative systems of governance in all levels of society, engaging people's creativity, energy and diversity.
- 13.3 In looking to regulate the development and use of land in the public interest, planning is key to achieving sustainable development by promoting environmental, economic and social objectives together over time. The National Planning Policy Framework (NPPF) ~~MHCLG (Ministry for Housing Communities and Local Government), February 2019~~ July 2021 defines the purpose of planning as follows:

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

13.4 The London Plan seeks to promote 'Good Growth' in London. By, building strong inclusive communities, making the best use of land, creating a healthy city, building more homes and affordable housing to address the housing crisis, growing and maintaining a strong economy, increasing efficiency and resilience by moving towards a net-zero carbon city by 2050 and adapting to the impacts of climate change.

It is imperative that future growth in Merton must be **socially** and **economically inclusive** and **environmentally sustainable** and, contribute to the London Plan Good Growth Objectives.

- GG1 Building strong and inclusive communities.
- GG2 Making the best use of land.
- GG3 Creating a healthy city.
- GG4 Delivering the homes Londoners need.
- GG5 Growing a good economy.
- GG6 Increasing efficiency and resilience.

13.5 The Council expects all growth in Merton to be **socially** and **economically inclusive** and **environmentally sustainable** and contribute to the London Plan Good Growth Objectives.

Strategic policies

13.6 The National Planning Policy Framework (NPPF) 2021, states that strategic policies are required for the area of each local planning authority should include those policies, and strategic site allocations, necessary to provide:

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

13.7 It further states that:

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

14 Sustainability appraisal and strategic environmental assessment

14.1 The sustainability appraisal is a specific requirement for all local plans of the Planning and Compulsory Purchase Act 2004. A sustainability appraisal considers how the principles of sustainable development have, been taken into account in the preparation of a local plan. Strategic environmental assessment (SEA) is required in the European Union by an EU Directive, commonly referred to as the SEA Directive. Its purpose is to assess the effects of certain plans and programmes on the environment. All local plans are considered to potentially, have significant environmental effects.

14.2 Sustainability appraisal and SEA are required by separate legislation, however as there are many crossovers between the two processes they are usually undertaken together. Where, the sustainability appraisal is referred to, this incorporates the requirements of SEA. There are several stages to the sustainability appraisal process, which are set out in Government guidance. The table below shows these stages and indicates how these relate to the different stages of preparing Merton's Local Plan. This Sustainability Appraisal Report accompanies the submission stage of plan, to be submitted to, the Planning Inspectorate for independent examination. The previously published sustainability appraisal are as follows:

- The scoping report and identifying sustainability issues and problems
- Sustainability Appraisal report (stage 2 consultation)
- Sustainability Appraisal pre-submission
- Sustainability Appraisal submission

15 Local Plan amendments following pre submission consultation (July 2021)

15.1 This section looks at the change to the Local Plan following the stage 3 consultation in July 2021. The council is proposing Main Modifications and Additional Modifications to the Local Plan following comments received from the public consultation from residents, community groups, key statutory bodies such as Thames Water, GLA, Historic England and Transport for London.

15.2 This section appraises the Main Modifications which are recommended to ensure that the Local Plan is sound. Although the Main Modifications Table to be submitted with the Local Plan contains a larger number of Main Modifications, these are grouped around four key matters and as such, the modifications they propose are taken together:

- Tall buildings and general conformity with the London Plan, as found in the GLA's representation
- Modifications to the Morden policy, in part arising from a reassessment of the effectiveness of the policy following amendments to the Tall Buildings policies
- Removal or amendments relating to Crossrail2, following consultation feedback that parts of the Plan still refer to Crossrail2 or associated projects being potentially delivered during the lifetime of the Local Plan, when this is not the case.
- Policies Map amendments relating to:
 - Changes to remove existing buildings or proposed buildings from specific land designations
 - Amendments to nature conservation designations for sites
 - Factual additions of locally listed buildings and archaeological designations
 - Additions for clarity on cycle routes and the Wandle Trail "missing link"

15.3 The assessment has concluded that there are no sustainability implications and no 'likely effect'. The additional wording provides clarity and conformity to the NPPF.

15.4 There are no significant cumulative negative impacts of the modifications, nor is there any impact on the designated areas as defined by Habitats Regulations Assessment.

Summary of Main Modifications

Tall buildings

- 15.5 The council's policy remains the same on taller buildings in terms of their locations and heights. However, the GLA raised issues of general conformity with the Local Plan in response to Stage 3. These relate to clarity on where tall buildings were proposed and further detail on height ranges. The council has therefore proposed a series of main modifications to:
- Add three Strategic Heights Diagrams to Policy D12.6 Tall Buildings to illustrate where taller buildings may be acceptable in Colliers Wood, Morden and Wimbledon
 - Add text to the three policies at Colliers Wood (N3.1), Morden (N5.1) and Wimbledon (N.9.1) to refer to policy D12.6, the strategic heights diagrams.
 - Amend policy D12.6 to clarify the height in metres to the eaves of the building as 21 metres and that tall buildings can be considered for specific site allocations (which were identified in the Local Plan at Reg19 stage)
- 15.6 This resulted in a series of Main Modifications to policies N3.1 Colliers Wood; N5.1 Morden, N9.1 Wimbledon and D12.6 Tall Buildings with the aim of adding clarity and bringing the Local Plan into general conformity with the GLA. The Main Modifications proposed do not change the locations or heights of the buildings from Stage 3

Morden

- 15.7 Following Stage 3 the council proposes to amend the Morden policy. As stated above Main Modification MM3.1 results in tall buildings only being supported within the Morden Regeneration Zone (Mo1) to bring the Local Plan into general conformity with the London Plan.
- 15.8 The removal of references to the potential appropriateness of tall buildings within some locations in the Wider Morden Town Centre Area (WMTCA), but outside the Morden Regeneration Zone. It results in the designation of the Wider Morden Town Centre Area no longer being justified, as development proposals within this area could be addressed by means of other policies within the draft Local Plan and the London Plan, including its inclusion in the Wimbledon / South Wimbledon / Colliers Wood opportunity area. A series of Main Modifications are therefore proposed to remove the Wider Morden Town Centre Area (text and images) from the Local Plan.

Crossrail2

- 15.9 A series of Main Modifications are proposed to Merton’s Local Plan to clarify that Crossrail2 will not be delivered during the lifetime of this local plan. These modifications involve either removing reference to Crossrail2 where the Local Plan previously stated that the council would work with the Crossrail2 team on Crossrail2. Or, clarifying that Crossrail2 is currently unfunded, not proposed for further government funding and therefore it and the projects it would have been fundamental to deliver (e.g. another road bridge across the railway tracks to the north of Wimbledon town centre) will not be delivered. The council is therefore recommending Main Modifications throughout the Local Plan to this effect.
- 15.10 It should be noted that Policy 16T6 Supporting Transport Infrastructure still contains reference to Crossrail2 and that should it restart the council would work with Network Rail and others to help deliver it.

Policies Map

Figure 13a: Policies map modifications

<u>Mod Ref.</u>	<u>Plan Ref.</u>	<u>Proposed Changes</u>	<u>Reason</u>
<u>MM- MOL Map- 01a</u>	<u>Policies Map – Metropolitan Open Land</u>	<u><i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-3).</i></u>	<u>This site contains 4 residential properties, which do not form part of the adjoining cemetery. They do not meet any of the MOL criteria set out in the London Plan and officers consider that their inclusion in the MOL is an anomaly and is removed. The modifications ensure that the Local Plan is ‘justified’.</u> <u>- Refer to maps Appendix 1 for details.</u>

<p><u>MM-MOL Map-01b</u></p>	<p><u>Policies Map – Metropolitan Open Land</u></p>	<p><u><i>Slight boundary amendments around the Eveline Day Nursery SW20 9NA from Lower Morden Metropolitan Open Land (MOL-3).</i></u></p>	<p><u>Corrections to the MOL boundary have been made to fix a GIS error from the Stage 3 maps where the MOL boundary did not align with the property boundaries. The modifications ensure that the Local Plan is ‘justified’.</u></p> <p><u>Refer to maps Appendix 1 for details</u></p>
<p><u>MM-Open Space Map-02</u></p>	<p><u>Policies Map – Open Space</u></p>	<p><u><i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Merton and Sutton Joint Cemetery Surrounds Open Space (M074).</i></u></p> <p>-</p>	<p><u>This site contains 4 residential properties, which do not form part of the adjoining cemetery. They do not meet the Open Space criteria set out in the Merton Green Infrastructure Study 2020. Officers consider that their inclusion in the Open Space designation is an anomaly and they should be removed. The modifications ensure that the Local Plan is ‘justified’.</u></p> <p>-</p> <p><u>Refer to map Appendix 1 for details.</u></p>
<p><u>MM-Open Space Map-03</u></p>	<p><u>Policies Map – Open Space</u></p>	<p><u><i>Remove part of Tooting and Mitcham Imperial Sports Ground from Open Space (P028), in accordance with approved planning application 19/P4094.</i></u></p>	<p><u>In accordance with approved Planning Application 19/P4094. This is to align with the amendment made to the MOL boundary, as per the Stage 3 Policy maps. Officers reviewed the site prior to Stage 3 consultation; however, it was left off the published map in error. The modifications ensure that the Local Plan is ‘justified’.</u></p> <p><u>Refer to map in Appendix 1 for details.</u></p>

<p><u>MM-Open Space Map-04</u></p>	<p><u>Policies Map – Open Space</u></p> <p>-</p>	<p><u>Remove part of the Eastfields estate site owned by Clarion Housing Group from Streatham Park Cemetery Open Space (C004).</u></p> <p>-</p> <p>-</p>	<p><u>In accordance with approved Planning Application 19/P4094. This is to align with the approved planning application 17/P1717. Clarion Housing Group highlighted this change through their response to the Stage 3 Local Plan consultation. The modifications ensure that the Local Plan is ‘justified’.</u></p> <p>-</p> <p><u>Refer to map Appendix 1 for details.</u></p>
<p><u>MM-Open Space Map-04</u></p>	<p><u>Policies Map – Open Space</u></p>	<p><u>Remove part of the Long Bolstead Recreation Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).</u></p> <p>-</p>	<p><u>In accordance with approved Planning Application 19/P4094. This is to align with the approved planning application 17/P1717. Officers following the Clarion Housing Group response to the Stage 3 Local Plan consultation identified this change. The modifications ensure that the Local Plan is ‘justified’.</u></p> <p>-</p> <p><u>Refer to map Appendix 1 for details.</u></p>
<p><u>MM-SINC Map-05</u></p>	<p><u>Policies Map – Sites of Importance for Nature Conservation</u></p>	<p><u>Wimbledon Park SINC (MeB102) - An additional area of land needs to be included in this SINC as the land contains a number of veteran trees and other wildlife interest.</u></p>	<p><u>Reviewed following Stage 3 Local Plan response (D .Dawson) and confirmed by Martin Boyle (LBM Greenspaces team).</u></p> <p><u>As part of the recent Wimbledon Park Lake project, this land has been extensively surveyed and it holds nature conservation interest in line with the SINC designation. It is considered that the site was excluded in error.</u></p> <p><u>This change was identified through a Stage 3 Local Plan consultation response and has been confirmed with the Council’s Ecologist.</u></p>

			<p>The modifications ensure that the Local Plan is 'justified'.</p> <p>- Refer to map Appendix 1 for details.</p>
<u>MM-SINC Map-06</u>	<p><u>Policies Map – Sites of Importance for Nature Conservation</u></p> <p>-</p>	<p><u>Myrna Close SINC (MeBII10) - The SINC boundary needs to be amended in accordance with approved planning application 16/P3430.</u></p>	<p>In accordance with approved Planning Application 16/P3430 to reflect the residential properties that have been built and the new ecology area created on site.</p> <p>The site was reviewed by officers prior to Stage 2a consultation, however it was left off the published map in error. The modifications ensure that the Local Plan is 'justified'.</p> <p>- Refer to map Appendix 1 for details.</p>
<u>MM-Green Corridor Map-07</u>	<p><u>Policies Map – Green Corridor</u></p>	<p><u>Ridge Road to Wimbledon Park Green Corridor (GC19) - The Green Corridor boundary needs to be amended to remove part of the Thames Water site at Byegrove Road, Colliers Wood.</u></p> <p>-</p>	<p>In discussions with Thames Water officers agree that this part of the site does not meet the Green Corridor criteria and therefore should be removed from the Policies Map. Up to date site photos were provided by Thames Water following the Stage 3 submission. The modifications ensure that the Local Plan is 'justified'.</p> <p>- Refer to map Appendix 1 for details.</p> <p>-</p>
<u>MM-APZs-Map-08</u>	<p><u>Policies Map – Archaeological Priority Zones</u></p>	<p><u>Removed the map showing Archaeological Priority Zones from the Policies Map.</u></p>	<p>For accuracy and to ensure that the Local Plan is 'justified', this data has been removed because it has been superseded by Archaeological Priority</p>

			<p><u>Areas according to the latest information from Historic England.</u></p> <p><u>Refer to map Appendix 1 for details.</u></p>
<u>MM-Conservation Areas-Map-09</u>	<u>Policies Map Conservation Areas</u>	<u>Added labels to the map showing the Conservation Area codes and also a table below the legend with the name of each of the Conservation Areas</u>	<p><u>For clarity and to ensure the Local Plan is “justified”, the Conservation Areas map has been labelled.</u></p> <p><u>Refer to map Appendix 1 for details.</u></p>
<u>MM-Listed Buildings-Map-10</u>	<u>Policies Map Listed Buildings</u>	<u>Updated to provide the latest information.</u>	<u>For accuracy this map has been updated with the latest information from Historic England. This modification ensures that the Local Plan is “justified”</u>
<u>MM- Locally Listed Buildings-Map-11</u>	<u>Policies Map Locally Listed Buildings</u>	<u>Updated to provide the latest information.</u>	<p><u>For accuracy this map has been updated with the latest information from Merton Council. This modification ensures that the Local Plan is “justified”.</u></p> <p><u>Refer to map Appendix 1 for details.</u></p>
<u>MM-Wandle Cycle Route-Map-12</u>	<u>Policies Map Wandle Cycle Route</u>	<u>New map to highlight the cycle routes that are part of the Wandle Trail</u>	<p><u>For clarity the cycle network that is part of the Wandle Trail has been added as a separate map to highlight its importance in enabling active travel choices. This change was requested at the Stage 3 consultation from the Wandle Valley Forum.</u></p> <p><u>Refer to map Appendix 1 for details.</u></p>
<u>MM-Merton-Cycle Network-Map13</u>	<u>Policies Map New map</u>	<u>Cycle network routes have been updated to show the Wandle Missing Link</u>	<u>For accuracy and to ensure that the Local Plan is ‘justified’, the cycle network map has been updated to reflect the latest agreement on the Wandle Missing Link on the borough</u>

			<u>boundary between Merton and Wandsworth.</u> <u>Refer to map Appendix 1 for details.</u>
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15.11 As part of the SA, process local authorities are required to determine the likely significant effect of the proposed Main Modifications on social, environmental and economic sustainability objectives. It is important to note that figure 13b has focused on the impact of the proposed.

Figure 13b: Assessing the Local Plan modifications

<u>Policy</u>	<u>Additional SA needed</u>
<u>Colliers Wood (N3.1), Morden (N5.1) and Wimbledon (N.9.1)</u>	<u>There are no sustainability implication and no likely effects to the policy or Plan</u>
<u>D12.6 Tall Buildings</u>	<u>There are no sustainability implication and no likely effects to the policy or Plan</u>
<u>Crossrail2</u>	<u>There are no sustainability implication and no likely effects to the policy or Plan</u>
<u>Policies MAP</u>	<u>There are no sustainability implication and no likely effects to the policy or Plan</u>

16 Reasonable alternatives

- 16.1 This section explains how the Local Plan and evidence informed establish 'reasonable alternatives' for appraisal. The aim of this chapter is to present 'an outline of the reasoning for selecting the alternatives dealt with', in accordance with the SEA Regulations.
- 16.2 As mentioned early in the report, the Local Plan must be in 'general conformity' with the London Plan. In this context, the current London Plan (2021) is the starting point for the development of potential alternatives for the emerging Local Plan. The London Plan 2021 was drafted alongside the creation of this local plan and was submitted to the Secretary of State for examination in 2019. The examination process took over a year and the Secretary of State issued a number of Directions in late 2020 and early 2021, just prior to the London Plan's publication in March 2021. Although "general conformity" does not mean absolute replication on all matters, being required to be in "general conformity" restricts the scope of reasonable alternative options that Merton's Local Plan could explore.
- 16.3 Supporting growth and development, particularly of new homes, is a key driver for the current planning system. Consultation feedback received throughout the Local Plan process demonstrated a consistent challenge to supporting the development of new homes and jobs. Feedback at public meetings and in writing often queried the need to build more homes or provide more development of business space. Government's policy is clear that local planning authorities must plan for developments to meet their needs, and that there is a need for new homes to help address the housing crisis. The extensive work on the recently published London Plan, in collaboration with all London boroughs, has resulted in each borough being allocated a share of London's housing need as their housing target. There is no reasonable alternative to developing Local Plan policies that support growth, particularly of homes and jobs, and indeed a policy position
- 16.4 A reviewed of the documents was carried out against the most up to date planning policies (national and regional) and their performance as reported in the Authority Monitoring Report. A number of policies did indeed need updating (for example policies towards zero carbon and tackling climate change) but the planning policies objective and/or direction for most remained the same, even in the context of government's recent planning changes. In other words, the intentions of policies still aligned with the priorities of the council and central/regional policy (for example increasing the supply of new homes; protecting open spaces, enhancing biodiversity,

managing flood risk, reducing air pollution, encouraging walking and cycling etc)

- 16.5 A fundamental aspect of developing local planning policies is having robust local evidence; this includes research and feedback to public consultation. The council produced a number of evidence-based studies, some on their own and some in collaboration with other councils and collaborated with other boroughs or other government bodies. The development of this research considered alternative options and the findings from this research and consultation feedback informed policy direction, site-specific allocations and land designations.
- 16.6 The London Plan sets Merton's share of London's new homes and prescribes policy direction around the proportion of affordable housing each borough is expected to deliver and the methods used to both calculate and deliver this. Merton does not have local evidence that outweighs the extensive collaboration that all boroughs and the GLA undertook to produce the London-wide Strategic Housing Land Availability Assessment and therefore the adopted London Plan targets so there are no reasonable alternative to delivering this. The affordable housing tenure split, the fast-track viability approach, the measurement of affordable homes in both units and habitable rooms are all prescribed in the London Plan and Merton's evidence (Strategic Housing Needs Assessment; Merton's Housing Viability Study, Merton's Draft Housing Delivery strategy; Merton's Housing Delivery Research) does not justify reasonable alternatives.
- 16.7 Where Merton has exercised reasonable alternatives is in its creation of a policy requiring contributions from small sites towards affordable housing. This policy approach was derived in part from the characteristics of development in Merton as recorded in Merton's housing delivery research and Merton's Draft Housing Delivery Strategy: a long history of fragmented land ownership and high land values leading to c90percentage of planning application each year being for small sites (10 homes or less). Given London and Merton's housing needs and affordability issues, not delivering affordable homes was not a reasonable alternative. Merton's Housing Viability Study explored a wide range of alternative viability scenarios and concluded that it is viable to require contributions from smaller sites towards affordable housing. The extensive research into the borough's characteristics and housing viability locally led the council to conclude that there were no reasonable alternatives to deliver affordable homes in Merton

than requiring contributions from smaller sites towards affordable housing.

16.8 National and London Plan policies are clear on many directions for environmental policy: the protection of open space, the delivery of playing pitches and sports facilities to meet the demands of the local population, the management of flood risk. Merton carried out extensive work in these areas (Merton's Green Infrastructure Study 2020; Merton's Playing Pitch Strategy 2019 and Indoor Sports Study 2020; Merton's Strategic Flood Risk Assessment 2020) and reasonable alternatives were considered within this research. For example it is considered that there are limited reasonable alternatives to the green and blue infrastructure policies and the infrastructure policies within the Local Plan as they are based on robust evidence which itself assessed alternative scenarios.

- **Merton's Green Infrastructure Study 2020** evaluated quantitative and qualitative aspects of open spaces and nature conservation areas, including an assessment of specific sites, future forecasting of needs and engagement with users of open spaces. This extensive work considered reasonable alternatives within the study, for example site boundaries and user priorities for different open spaces. The findings of the study have informed the Local Plan policy direction on green and blue infrastructure and the land designations in the Policies Map.
- **Merton's Strategic Flood Risk Assessment 2019** (with Wandsworth Council) modelled flood risk throughout the borough and from all sources. The flood risk modelling carried out with the Environment Agency's guidance and approval and incorporated alternative scenarios to consider the impacts of a changing climate on increasing flood risk. The final assessment contains detailed maps identifying areas in Merton of flood risk from groundwater, surface water, fluvial flood risk and in-combination risks. The SFRA makes policy recommendations, provides flood risk policies maps and recommendations on the site allocations and other sites in Merton.
- **Merton's Playing Pitch Study 2019 and Indoor Sports Assessment 2020** developed using Sport England's methodology and developed in conjunction with Sport England and the National Governing bodies for sports. Like the green infrastructure study, the playing pitch and indoor sports research forecasted need for sports facilities into the future based on demographic trends, different ages and affordability and current provision. Reasonable alternatives arose during the creation of the strategy, for example in considering the likely future demand for youth and adult football in comparison to other sports or considering the potential for co-locating different sports facilities

- 16.9 The climate change policies reviewed a range of reasonable alternatives before determining the policy direction. The basis for the policies is that both Merton and central government have cited reaching net zero by 2050 as a target to try to reduce the continual changing climate and warming planet. With 86,000 homes in Merton most of which are fuelled by gas, this already requires extensive retrofit. Neither government's building regulations nor the new London Plan policies will result in buildings built today that will enable us to reach net zero in 2050 without further retrofitting of these buildings, at an economic cost to the occupiers and an environmental and social cost to the wider population. Merton's policies therefore seek to construct buildings now that will require as little retrofit or modification as possible to reach government's net zero target by 2050. As Merton and government have committed to this target (in 2020 and 2021 respectively) and Merton's Local Plan is being updated now, the alternative approach of complying with the London Plan climate policies was rejected as these were developed in 2018-19 would not enable net zero by 2050 without further extensive and expensive retrofit.
- 16.10 The requirements of the climate change policies do not specify a particular technology; the applicant can consider a range of approaches to deliver their particular development as long as they meet the necessary targets. This gives the applicant flexibility to apply the best approach to their site circumstances and scale of development, and allow new alternative technologies to be introduced as they arise.
- 16.11 As well as the housing policies, the climate change policies are informed by, viability testing. Merton's Housing Viability Study tested a wide range of alternative options for costs relating to affordable housing, climate change, site circumstances (e.g. car parking, play space, size and scale of development, different land values, mix of uses etc). These alternative scenarios are contained within the study
- 16.12 The London Plan sets a framework for economic development and town centres, prescribing the status of town centres (major, district etc.). Merton's Local Plan proposes Colliers Wood as a District Centre for the first time based on its quantity and quality of its retail and other town centre offer. The council has scope to recommend local town centres and propose South Wimbledon propose in the Local Plan to be designated as a local centre for the first time based on consultation feedback and an assessment of its neighbourhood. In Merton's Core Planning Strategy 2011 Colliers Wood and South Wimbledon are considered one neighbourhood. The uncoupling of Colliers Wood and South Wimbledon is a reasonable alternative, which is taken forward in the Local Plan and is

support by this SA/SEA. The London Plan also specifies Merton's Strategic Industrial Locations, although the local planning authority has scope to amend the boundaries in consultation with the GLA.

16.13 For site allocations, the option not to allocate a site was considered as a 'reasonable alternative' to each site as part of this process. Another reasonable alternative was to also remove a site(s) if, it was developed and occupied prior during the course of the Local Plan development towards adoption. Appendix B outlines the reason for not taking forward reasonable alternatives.

16.14 At each stage of consultation, the Council consulted with the government statutory bodies during this process, recommendations were made to, add to the indicators and provide more details. The Council adopted all the recommendations for the indicators. The additions will ensure that Local Plan especially the environmental indicators can monitor known issues and importantly the performance of the Local Plan to mitigate, reduce and minimise the effects.

16.15 The SA is only one consideration, alongside consultation results, evidence and conformity with regional and national policy requirements that helped determine the draft and final policy approaches set out in Merton's Local Plan.

Appraisal methodology

- 16.16 Several guidance documents have been issued in relation to SA/SEA and the methodologies outlined in these have been used where still applicable:
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister (November 2005)
 - Practical Guide to the SEA Directive, Office of the Deputy Prime Minister (September 2005).
 - Sustainability Appraisal Planning Policy Manual, Planning Advisory Service (2009); and
 - Sustainability Appraisal: advice note, Planning Advisory Service (2010)

- 16.17 Using a symbols matrix to appraisal Plan against the sustainability objectives. When determining the likely significance of effects, consideration, were, given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant. The following symbols were, used:
- 16.18 The results of appraisal scoring presented in tables. It is imperative to note, that the sustainability appraisal scoring is not a quantitative process but a qualitative one and therefore does not entail simply adding up how many pluses or minuses one option has over another.

Figure 14: SA scoring matrix

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
	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

17 Apprising the Local Plan urban objectives

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

Figure 15: Local Plan Objectives

	Sustainability Objectives																					
Local Plan Objectives	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022
Supporting Resilience	Light Green	Light Green	White	Light Green	Light Green	Light Green	Dark Green	White	White	White	White	Light Green	Light Green	Dark Green	White	White	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
Good growth	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	White	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Dark Green	Dark Green
Tackling Climate Change	Light Green	Light Green	Light Green	Light Green	White	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	White	White	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
Places and the 20-minute neighbourhood	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	White	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green
Places for people	Light Green	Light Green	White	White	Light Green	White	White	White	White	White	White	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green

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

18 Appraisal of planning policies

18.1 This section sets out the ‘likely significant effects’, both positive and negative, identified in the appraisal of the objectives, policies and reasonable alternatives. There have been some minor amendments of the Local Plan since the last consultation (pre-submission stage). The amendments provide clarity and/aim to be more succinct wording (or ‘plain English’). Other changes influenced by findings and recommendations of evidence studies/reports carried out in

accordance with guidelines and/or statutory requirements. These changes do not change direction of the Local Plan. More importantly, they are in line with national and regional planning policies and guidance.

18.2 Government guidance on Sustainability Appraisals states that:

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

18.3 The SEA Directive states:

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

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

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

- a) An overall strategy for the pattern and scale of development.
- b) The homes and workplaces needed, including affordable housing.
- c) Appropriate retail, leisure and other commercial development.
- d) Infrastructure for transport, telecommunications, security, waste management.
- e) Water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy

- (including heat).
- f) Community facilities (such as health, education and cultural infrastructure); and
 - g) Climate change mitigation and adaptation, and conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure.

Figure 16: The effect of the policy (time span)

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

Figure 17: Climate change policies

Policy	Sustainability Objectives																				The effect of the policy				
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term	
Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change	Light Green	Light Green	Light Green			Light Green	Dark Green				Light Green		Dark Green	Light Green		Light Green			Light Green				Light Green	permanent	Long
Policy CC2.2 Minimising greenhouse gas emissions).	Light Green	Light Green	Light Green				Dark Green					Light Green	Dark Green	Light Green		Light Green			Light Green				Light Green	Permanent	Long
Policy CC2.3 Minimising energy use	Light Green	Light Green	Light Green			Light Green	Dark Green						Dark Green	Light Green	Light Green				Light Green				Light Green	Permanent	Long
Policy CC2.4 Low carbon energy	Light Green	Light Green					Dark Green						Dark Green	Light Green	Light Green				Light Green				Light Green	Permanent	Long
Policy CC2.5	Light Green	Light Green	Light Green			Light Green	Dark Green						Dark Green						Light Green	Light Green	Light Green	Light Green	Light Green	Permanent	Long

Figure 18: Neighbourhood policies (sub areas)

Policy	Policy aim	Sustainability Objectives.																				The effect of the policy			
		S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term
Policy N3.1 Colliers Wood	To designate Colliers Wood as a District Centre and provide policy and site allocations appropriate to its setting.	Light Green	Light Green		Light Green	Light Green	Dark Green	Light Green				Light Green	Dark Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Permanent	Long
Policy N.4.1 Mitcham	To support development in Mitcham that enhances jobs and services for local people, is well designed and provides homes on upper floors.	Light Green			Light Green	Light Green	Light Green					Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Permanent	Long
Policy N5.1 Morden	The delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area, which includes intensification and comprehensive development within the Morden Regeneration Zone.	Light Green		Grey	Dark Green	Light Green		Light Green				Dark Green	Dark Green	Light Green	Dark Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green		Permanent	Long
Policy N6.1 Raynes Park	To support development in Raynes Park and surrounds commensurate with its character and setting.	Light Green			Light Green	Light Green	Dark Green		Light Green			Light Green	Light Green		Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Permanent	Long

Policy N7.1 South Wimbledon	To create a new local town centre at South Wimbledon	+			+			?	+			+	+	?	+	+	+	+	+	+	+	+	+	Permanent	Long
Policy N9 Wimbledon	To support Wimbledon, thrive as the borough's major centre.	+	+		+	+	+		+			+	++	?	++	+	+	+	+	+	+	+	++	Permanent	Long

Appraisal commentary

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

Plan, for example design policy should ensure that Raynes Park keeps its distinctive character well delivering much needed homes and support businesses.

18.14 The Wimbledon neighbourhood policy seeks to support Wimbledon, thriving as the borough’s major centre within in Merton’s Opportunity Area and a leading key town centre that is required to support business. The policy performs well against the SA Objectives.

18.15 The South Wimbledon Policy seeks to create a new standalone neighbourhood uncoupled from Colliers Wood neighbourhood. This approach has been strongly influenced by resident and it supported by the Council. The policy recognises its historical assets, its role in the OA (Opportunity Area) and its need to improve inequalities in the area by delivering news homes and supporting businesses.

Figure 19: Health and wellbeing policies

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

Appraisal commentary

- 18.16 A healthy place is somewhere that promotes good mental health and wellbeing, makes healthy choices easier, and protects people from harm. These all affected by how we interact with the streets, buildings, green spaces, community spaces and social connections that make up our neighbourhoods. The health and wellbeing policies with other policies such as design policies, green infrastructure seek to create healthy places.
- 18.17 The health and wellbeing policies seek to improve the health (including mental health) and wellbeing of Merton's residents. The strategic policy HW10.1 Health (including mental health) and Wellbeing clearly sets out the health priorities and approaches required to improve health inequalities in partnership with key bodies and developers. Policy HW10.2: Delivering healthy places sets out the role that development proposals will play in improve health and wellbeing, for example in areas of deprivation, it sets out the management and monitoring of fast-food establishments proposal in Merton especially those near schools. In addition, the use and importance of Health Impact Assessment for development proposal in the borough.
- 18.18 The health and wellbeing policies supports individual access to healthier choices and places. It promotes a number of design approaches that encourages healthier, safer and greener environments such as Healthy Streets Approach, dementia friendly design and 20 Minutes Neighbourhoods. The policy enables physical activity, by facilitating, enable and prompting behaviour changes such as, active sustainable forms of transport like walking and cycling.
- 18.19 Healthy streets, 20 Minutes Neighbourhoods and other approaches mentioned in the policies can promote an attractive and create well –designed environments, which encourages a sense of place and belonging. Improvements to accessibility and connectivity is be positively affected by the policies, particularly through the Healthy Street Approach. The policies will have positive effects on improving air quality and mitigating against climate change by reducing private vehicle use and promote active, more sustainable and greener travel.
- 18.20 Both policies seek health and wellbeing for current and future residents. Indirectly, the approach will improve economic prosperity, improve income inequalities, improve, and strengthen resilience. Furthermore, in the wider context reduce the financial burden and pressure on the National Health Service (NHS) plus, associated costs from loss of productivity to the UK economy. The policies perfume well against a number SA Objective including social objectives

Figure 20: Housing policies

Policy	Sustainability Objectives																					The effect of the policy			
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term	
Strategic Policy H11.1: Housing Choice				■										■	■	■	■	■	■	■	■	■	■	Permanent	Long
Strategic Policy H11.2: Housing Provision				■								■	■	■	■	■	■	■	■	■	■	■	■	Permanent	Long
Policy 11.3 Housing Mix				■									■	■	■	■	■	■		■	■	■	Permanent	Long	
Policy H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.	■		■	■								■	■	■	■	■	■	■		■	■	■	Permanent	long	
Policy H11.5 Student housing, other housing with shared facilities and bedsits	■			■								■	■	■	■	■	■	■	■	■	■	■	Permanent	Long	
Policy H11.6 Accommodation of Gypsies and Travellers	■			■		■					■			■	■	■	■	■	■	■	■	■	Permanent	Medium	
Policy No. H11.7 Build to rent.				■									■	■	■		■	■		■	■	■	Permanent	Medium	

Appraisal commentary

- 18.21 The London Plan has identified the need for 66,000 additional homes per year across London. Merton's ten-year London Plan housing target is 9,180 (918 per year). The 2019 Merton Strategic Housing Needs Assessment (SHNA) identified a need for more homes of all types and sizes throughout the borough. In line with the London Plan new homes will be concentrated around existing town centres and areas with good access to public transport and local services, these areas include neighbourhoods in Mitcham, Morden, Colliers Wood, South Wimbledon, Wimbledon and Raynes Park.
- 18.22 The affordability ratio in Merton is higher than both London and England, so lower-income residents and first-time buyers may struggle to get on the property ladder². Expensive housing is likely to push low-income households in to overcrowded and unsuitable conditions. Average rental prices have increased 39% over the last 10 years³ Housing is more expensive in the west of the borough. The pandemic has affected the cost of housing in Merton with rises of 13% between June 2020 and June 2021.
- 18.23 Rates of households in temporary accommodation in Merton are lower than the London average with 1.9 households per 1000. There are currently 260 children in temporary household accommodation in Merton, which is the lowest rate in London⁴. Although, Merton's levels of homelessness and use of temporary accommodation is low, homelessness applications due to evictions are expected to rise following the ending of the evictions moratorium during the COVID pandemic.
- 18.24 Against, the COVID backdrop the housing policies support a range of interventions to unlock development. They will help to facilitate the delivery of much need new homes and choices. The emphasis on redeveloping brownfield sites, promoting small sites development and regeneration will help to ensure sites capacity are optimised to assist meeting our housing delivery targets.
- 18.25 The housing policies emphasises the importance of design, more importantly 'good' design including the provision of amenity areas. Policies emphasises the need for development to understand the relationship between new residential areas and surrounding developments, including supporting connectivity. By supporting high quality, design which include shared open spaces, public realm and active transport infrastructure, policy H11.2: Housing Provision would have

² <https://data.merton.gov.uk/housing/>

³ <https://www.merton.gov.uk/assets/Documents/Draft%20Homelessness%20Strategy%20to%202025.pdf>

⁴ https://lginform.local.gov.uk/reports/lqastandard?mod-metric=12891&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup

positive effects on the design objective. It also considers inclusive design, looking at the needs of a variety of groups to ensure housing provision supports them.

- 18.26 Strategic Policy H11.1: Housing Choice, Policy H11.2: Housing Provision, Policy H11.3 Housing Mix and other housing policies support the delivery of a range of housing types to improve resident choice and directly meet Merton’s housing need. This would help increase the range of housing available on the market and could include more specialist housing to meet particular needs, such as those with health conditions or disability (PolicyH4.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system).
- 18.27 New homes are required to conform to high design standards, and therefore the policies would help to reduce potential health risks such as damp, mould and cold. New homes tend to be more energy efficient and therefore issues such as fuel poverty is likely reduced. The policies would also help facilitate regeneration in the local area, delivering important physical and social infrastructure.
- 18.28 All the housing policies support improving health (including mental health) and wellbeing contribute to the local economic growth, education, local employment and help to tackle the wider determinants of health. It is, expected that the policy would have positive impacts on sustainable land-use, by helping to ensure that high densities do not result in adverse impacts for diverse groups of people and environment. The housing policies perform well against SA Objectives, where appropriate.

Figure 21: Design policies

Policy	Sustainability Objectives																						The effect of the policy	
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term
Strategic Policy LP D12.1 Delivering well designed and	Green	Green	Green	White	Green	Green	Green	Green	Green	White	Green	Green	Green	Green	Green	Green	Green	Green	Dark Green	White	White	Green	Permanent	Long

Appraisal commentary

- 18.29 The design of buildings, our environment and neighbourhoods are important for many reasons; a well-deigned building is aesthetically pleasing, blends naturally with its neighbouring structures and is easy to use for everyone-as well as this it must also meet the building regulations. It is widely recognised that place and space have a direct impact on human health and wellbeing and that; individual actions to improve our lifestyle or health status is, influenced by environmental and socioeconomic context in which they take place.
- 18.30 Also important are the connections between these spaces, including the built infrastructure and a range of natural features. The built environment includes several material determinants of health, including housing, neighbourhood conditions and transport routes, all of which shape the social, economic and environmental conditions which, good health is dependent. Within urban areas, the imaginative integration of built and natural features can help to create healthier and greener environments which, are unique and assist and support people to live a more active and healthy lives.
- 18.31 Developments in the borough are required to meet the highest standards of design, function and construction and help contribute to a net-zero carbon and climate-resilient future. The design policies seek to ensure that development proposals respect and positively respond to their context, townscape, landscape and public realm to strengthen Merton's character. Successful neighbourhoods are much more than just buildings. Historic environments and existing communities contribute to a successful place, and must be considered in designs. Delivering sustainable neighbourhoods is as important as delivering the homes.
- 18.32 Policy D12.3 Ensuring high quality design for all developments, ensure that all development no matter what type consider the impact on the environment, how people experience the development and how the development responds to its context such as heritage assets. The London Plan the policy is clear that heritage assets – should be seen as, an integral part of the urban fabric with a key role in place making and contributing to economic viability, accessibility,

environmental quality and social well-being. Merton’s local plan policy D12.5 Managing heritage assets supports this, and places an importance on Merton heritage assets and recognises the historical significance.

18.33 Policy D12.2 Urban design acknowledges that well designed places create a keen sense of community and helps to improve health and wellbeing. However, it also, seeks to ensure that local resilience to the impacts of climate change such as flooding (from all sources), overheating and subsidence.

18.34 The policy key aims is the creation of inclusive, sustainable, efficient and high-quality design and layout of the urban and suburban environment found in Merton. The design policies perform well across the SA Objectives.

Figure 22: Economy policies.

Policy	Sustainability Objectives																						The effect of the policy	
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term
Policy Ec13.1: Promoting economic growth and successful high streets (formerly Economic Development)	Light Green	Light Green		Light Green			Light Green				Light Green	Light Green		Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Long
Policy Ec 13.2: Business locations in Merton (Formerly Employment areas in Merton)	Light Green			Dark Green								Light Green		Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Long
Policy EC13.3 Protection of	Light Green			Dark Green				Light Green						Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Medium/Long

scattered employment sites	Light Green			Dark Green				Light Green						Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green		
Policy E13.4 Local Employment Opportunities				Dark Green										Light Green		Light Green	Light Green	Light Green		Dark Green	Dark Green	Dark Green	Permanent	Long
Policy TC13.5 Merton's town centres and neighbourhood parades	Light Green			Dark Green				Light Green								Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Dark Green	Permanent	Long
Policy TC13.6 Development of town centre type uses outside town centres.	Light Green			Light Green				Light Green				Light Green		Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Long
Policy TC13.7 Protecting corner / local shops	Light Green			Light Green				Light Green				Light Green	Light Green	Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Long
Policy TC13.8 Food and drink / leisure and entertainment	Light Green	Light Green	Light Green	Light Green				Light Green				Light Green	Light Green	Light Green		Light Green	Light Green	Light Green		Dark Green	Light Green	Dark Green	Permanent	Medium
Policy TC13.9 Culture, arts and tourism development				Dark Green									Light Green							Light Green	Dark Green	Dark Green	Permanent	Medium

Appraisal commentary

- 18.35 The pandemic is having an enormous impact on employment and work both nationally and in Merton. Unemployment has risen, particularly in the under 25s, and many people have been furloughed, which ended in October 2021. Some sectors for example retail, leisure and entertainment, are affected disproportionately by the pandemic, the lockdowns and social distancing precautions have all hit the sectors and will evidently mean some will struggle to recover.
- 18.36 The economy policies should have positive effects on the local economic competitiveness, employment and importantly support the COVID recovery and help stimulate the local economy. All will play a role both directly and indirectly in tackling climate change, other environmental impacts and improve the health and wellbeing of residents. The policies support the protection and enhancement of employment space, providing the necessary infrastructure to underpin economic vitality and job creation and training opportunities, through support for a diverse range of office sizes and types. They support both established businesses, as well as emerging industries/sectors including green industries and technologies. The approach is likely to promote regeneration in areas of higher deprivation, increasing productivity and economic participation rates of young people and low-income groups. The policies are likely to have positive outcomes employment opportunities, education and skills as well as improving the wider determinants of health of Merton residents.
- 18.37 The policies perform well against a number of SA objectives as expected the economic objectives as well as the social and environmental objectives.

Figure 23: Infrastructure policies

Policy	Sustainability Objectives																						The effect of the policy	
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term
Strategic policy IN14.1																							Permanent	Long

residents with a disability or existing health conditions. The policy strongly encourages the developer to engage and work with the Council, partnership working with providers such as health service and education departments. This approaches ensure the right social and community infrastructure is delivered in Merton.

- 18.40 Strategic policy IN14.1 Supporting Infrastructure and Policy IN14.2 Social and Community Infrastructure support equal provision of play spaces and seeks to increase provision in area of need; this would also have a highly positive effect to help reduce the health issue and improve the wider determinants of health of people living in deprived areas of the borough.
- 18.41 Policy IN14.3 Sport and Recreation, supports the provision and enhancement of sports and recreational facilities in Merton and would contribute significantly to wider health improvements by, promoting and enabling increased physical activities. The policy supports the delivery of a wide range of sporting and other activities to suits the interests and lifestyles of residents.
- 18.42 The policy addresses inequalities around accessing sporting facilities by the application of Sport England Standards, to provide equality and reduce health problems in deprived areas. Active lifestyles will have a profound positive effect on life expectancy and can provide a contribution to improved mental health. Ensuring sporting facilities have proper connectivity to pedestrian and cycling networks encourages people to continue physical activity outside of a formal setting and importantly, reduce traffic congestion and improve air quality. This would offer benefits to the wider community, not just users of these facilities. The policy also identifies the need to manage lighting appropriately to ensure there is no harm on the local community and biodiversity. The use of playing fields could also provide larger, green spaces across the city, increasing natural capital and greenery across London. However, any biodiversity will need protection in these areas and a balance assured between recreational use and wildlife.
- 18.43 The infrastructure policies perform well against a number of social and environmental objectives

Figure 24 Green infrastructure policies

Policy	Sustainability Objectives	The effect of the policy
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	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term
Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation																							Permanent	Long
Policy O15.2 Open Space and Green Infrastructure																							Permanent	long
Policy O15.3 Biodiversity and Access to Nature																							Permanent	long
Policy O15.4 Protection of Trees																							Permanent	Long
Policy O15.5 Urban Greening (formerly policy O8.6)																							Permanent	Long
Policy O15.6 Wandle Valley Regional Park (formerly																							Permanent	Long



Assessment comments.

- 18.44 Merton is one of the greenest boroughs in London with 35% of the borough classed as open space. This includes parks, commons, playgrounds, sports fields, allotments, cemeteries and churchyards, urban farms and woodlands. During the COVID-19, pandemic access to green space became especially important for all. The benefits of accessing green and blue spaces are widely known, from improving physical health, mental health and wellbeing to helping tackling climate change and improve biodiversity.
- 18.45 Green Infrastructure policies support improving health (including mental health) and wellbeing and the wider benefits of green environments, for example education and access to the natural world. The promotion of the healthy and safe green environment approaches would deliver further environmental benefits, contributing to improved air quality, encouraging and enabling walking and cycling. The Green Infrastructure policies ensures new areas of green infrastructure are part of developments proposals, which will encourage biodiversity and improve access for residents to functional public realm space. Furthermore, would ensure that new green space would also contribute positively to the character and townscape of the borough.
- 18.46 Policy O15.2 Open Space and Green Infrastructure and, policy O15.2 Open Space and Green Infrastructure policies places a strong emphasis on the protection and enhancement. While Policy O15.3 Biodiversity and Access to Nature ensures the protection of the species and habitats that forms, Merton’s green and blue networks and increase wider access to biodiversity in Merton.
- 18.47 Policy *O15.5 Urban Greening* ensures that new developments incorporate urban greening, green infrastructure which will improve across the borough and help to mitigate the impacts of climate change such as overheating, flooding and contribute reducing urban island effect. Similarly, green measures such as green walls and planting of trees (Policy O8.4 Protection of Trees) can absorb noise and vibrations, thereby reducing local noise levels, reduce flood incidents, improve water quality and improve soil quality. Where green infrastructure measures include harvesting and redirecting storm water, and/or using green roofs, overflow will be controlled helping to reduce discharges to surface and groundwater. The Green Infrastructure policies perform well against a number of SA Objectives including the environmental objectives.

Figure 25: Blue infrastructure policies.

Policy	Sustainability Objectives																				The effect of the policy			
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term
Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage																							Permanent	Long
Policy F15.8 Managing Local Flooding																							Permanent	Long
Policy F15.9 Sustainable drainage systems (SUDS)																							Permanent	Long

Appraisal commentary

18.48 The provision of housing and other development, which is resilient, and allows residents to remain safe and comfortable during flood events, will be an important aspect of managing future climate change. Policy F15.8 Managing Local Flood

would minimise the wide scale damage, reduce the potential risk of life, protect vital infrastructure, and associated interruptions and delays to economic activity that flooding events can cause. Protection from the potential impacts of increased development on land will, be managed appropriately to ensure the biodiversity of the river is protected alongside continued development and recreational use.

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

Figure 26: Air quality and pollutants policies

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

Appraisal commentary

- 18.50 Although levels of PM10 in the borough are better than the London average, they are higher than all our South West London neighbouring boroughs. Areas of high air pollution in Merton are almost entirely along main roads and associated with traffic and congestion. The levels of good air quality is not evenly distribution across Merton. More often than not areas of deprivation are more susceptible to the adverse impacts of poor air quality. These areas tend to have higher levels of health inequalities mixed with poor air is not an ideally environment to live in. Improvements to air quality would therefore help to improve the health of the population, particularly vulnerable groups such as young children, elderly people and those with respiratory conditions.
- 18.51 Improvements to health would also facilitate wider economic benefits by reducing healthcare costs associated with treating respiratory conditions and premature deaths. Improvements to air quality would help to alleviate the impacts of climate change and the heat island effect. The policy supports the environmental and social sustainability objectives. The policy performs well against a number of SA Objectives and very strongly against the environmental SA Objectives.

Figure 27: Sustainable Transport

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

area of Mitcham town centre, Lower Morden). These inequalities in access to transport limits access to crucial employment opportunities and access to essential services.

- 18.53 The rates of cycling and walking in Merton are higher than the London and England average. Although this is encouraging, levels of cycling are still lower than neighbouring boroughs Kingston, Richmond and Wandsworth with more developed cycling infrastructures. There are small sections of integrated cycling infrastructure on Cycleway 31 between Raynes Park and New Malden and CS7 in Colliers Wood. The rest of Merton's cycle lanes are often of a lower standard than neighbouring boroughs and disjointed from the rest of the network. To get more people of all and backgrounds to cycle and walk more, it is crucial that network facilitates this to happen, with greater accessibility, design to a high standard and safe to use for all, especially for children, women, disabled people and people with reduced mobility.
- 18.54 Strategic Policy T16.1 Sustainable Travel, Policy T16.5 Supporting transport infrastructure and Policy T16.3 Managing the Transport Impacts of Development seek to reduce dependency on car use and provide more accessible and attractive transport routes and networks. They seek to increase and enable active transport such as walking and cycling which, could have a beneficial effect on health and well-being through increased levels of exercise, reduced air pollution and carbon emissions, and less vehicle related noise disturbance.
- 18.55 By promoting and supporting more attractive transport options, in particular active transport options, such as cycling and walking, may improve landscaping which could indirectly benefit townscape and character, and alleviate the urban heat island effect. Increased connectivity would limit reliability on car trips, thereby reducing associated poor air quality and excess noise, whilst promoting affordable transport options that reduce socio-economic inequalities. Improving environmental conditions and air quality is particularly important for higher risk groups such as residents with existing respiratory conditions, young children, older people and pregnant women. T16.2 Prioritising active travel choices policy would also increase access to wider environmental infrastructure which could also provide positive economic benefits by supporting housing growth and access to opportunities such as employment and education.
- 18.56 Policy T16.3 Managing the Transport Impacts of Development policy will assess and mitigate transport impacts for new developments would have positive effects on sustainable land use, as it promotes the use of existing transport networks, both close to the development. The policy also supports the delivery of goods and services through more efficient and sustainable freight movement. This ensures businesses receive the goods and services they need to prosper, thus enhancing economic productivity in the long term. Freight services indirectly support a range of supply chains and business networks that underpin Merton's economic activity and employment, therefore having a positive effect on the

borough's economic growth. Delivery services also provide employment for workers across different skills, and this policy could therefore protect and facilitate jobs and growth in this sector.

- 18.57 Incorporating the Healthy Street Approach in the sustainable transport policies would bring more benefits that meet a number of SA objectives – environmental and social.
- 18.58 Overall, the policies are favourable against the sustainability objectives. The policies ensure that all development is sustainable, meeting the requirement of the NPPF economic, social and environmental objectives. The policies are clear that development must not have an adverse impact on the environment and human health where there, is a possibility that some harm may occur mitigation measure must be incorporated as part of the development and demonstration of these mitigations measures demonstrated by way of the appropriate assessment for example air quality assessments and transport statements.

19 Appraisal of the site allocations and Policies Map

- 19.1 The Site Allocations and Policies Map will help to deliver the borough's spatial vision and strategy objectives; and are aim to have a positive impact for all communities. They can:
- help provide and protect employment land to provide jobs in the borough
 - provide community facilities and infrastructure for local communities, for example through the incorporation of open space, play facilities, health facilities and other essential service for neighbourhoods and areas
 - help reduce the need to travel by car by encouraging sustainable transport
 - create healthy and safe environments such as provide well designed mix of housing (including affordable and supported housing) to meet local needs and Merton's growing and aging population
 - promote active living for Merton's diverse communities
- 19.2 It is important to note that site allocations comprise one part of the policy framework. Whilst they will set out appropriate uses for a site and considerations, site allocations will not normally deal with the detail precise requirements (e.g. the number of homes, or the number of storeys or the design and form of the building) and its relationship and/or impact to the environment including the historic/heritage environment. These detailed by way of the planning application stage. Other planning policy documents will be used in determining planning applications - the London Plan, NPPF and South London Waste Plan; all of which have been subject to an SA/SEA and of course

the new Local Plan once adopted, while play its part and become the development planning documents for Merton.

- 19.3 As with the previous SA/SEA, sites were, considered against a number of criteria. These include:
- Deliverability
 - Suitability – supported by evidence such as the Strategic Flood Risk Assessment 2021
 - Existing designated uses
 - Constraints (environmental, social and economic)
- 19.4 Overall, the site allocations perform favourable against the sustainability objectives. Where the assessment has highlighted an issue; these will be addressed as part of any submitted development proposal, ensuring the development is sustainable and would not have an adverse impact to the environmental, social or economic effects.

Figure 28: Colliers Wood site allocations assessed against the SA Objectives.

2 Colliers Wood neighbourhood site allocations					
Site allocations	CW1: Baltic Close	CW2: Car Park South of Britannia Point	CW3: Colliers Wood Community Centre	CW4: Colliers Wood Station	CW5: Priory Retail Park
Site allocation use	Residential and commercial mixed-use scheme	Delivery of new homes as part of a mixed-use development. Residential on upper floors with any of the following on the ground floor (financial and professional services, food and drink, office, assembly, health/day centre) or other sui generis use that is a suitable mix right for a town centre.	Mixed-use community and residential.	Any of the following or a suitable mix of retail, financial and professional restaurant or café, hot food takeaway, drinking establishment, leisure/health centre, offices and residential on upper floors. The Post Office should, be retained.	a suitable mix of town centre uses on the ground and lower floors (shops financial and professional services, food and drink, office, assembly, health/day centre or other sui generis use appropriate for a town centre), residential on upper floors and public space.
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					

SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure29 Mitcham site allocations assessed against the SA Objectives (site allocations Mi1-Mi5).

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

			of Mitcham Cricket Pavilion associated land and buildings.		
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 30: Mitcham site allocations assessed against the SA Objectives (site allocations Mi6-Mi10)

Mitcham neighbourhood site allocations					
Site ref:	Mi6: 326 and 328 London Road	Mi7: 370 London Road	Mi8: 1 to 12 Majestic Way	Mi9: Former Mitcham Fire Station	Mi10: Mitcham Library

Site allocation	Residential if, the office and community functions are provided elsewhere locally. Residential use would be dependent on the office and community use being re-provided locally.	Mixed used non-residential (shops, services, offices, community on the ground floor and residential on upper floors.	Mixed use: retail, businesses, food and drink and community services (health centres, crèches, day nurseries, day centre on the ground floors, residential on upper floors.	A mix of uses which could include any of the following: community uses (Clinics, health centres, crèches, day nurseries, day centre), other community uses such as a cinema, gallery, theatre, residential, restaurant/café, office, drinking establishment or non-food retail.	Library to be kept and improved (either on site or closer to Mitcham town centre). The rest of the site considered for a suitable mix or any of community uses, office or residential.
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					

SO20					
SO21					
SO22					

Figure 31: Mitcham site allocations assessed against the SA Objectives (site allocations Mi11-Mi15)

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

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

Figure 32: Mitcham site allocations assessed against the SA Objectives (site allocations Mi11-Mi15)

Mitcham neighbourhood site allocations				
Site ref:	Mi16: Mitcham Gasworks Western Road	Mi17: White Hart Pub and back land London Road	Mi18: Wilson Hospital	Mi19 Worsfold House Church Road
Site allocation:	Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre).	Restaurant /cafe or public house or drinking establishment with associated car park with potential for residential development to enable the restoration and viable function of the White Hart.	Healthcare with community and enabling residential development or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham.	A suitable mix of school and/or residential.
SA objective				
SO1				
SO2				
SO3				
SO4				
SO5				
SO6				
SO7				
SO8				
SO9				

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

Figure 33: Morden site allocations assessed against the SA Objectives (sites Mo1 – Mo5)

Morden neighbourhood site allocations					
Site ref:	⁵ MO4: Chaucer Centre (formally Mo 1)	Mo2: Farm Road Church	Mo3: Imperial Sports Ground Tooting and Mitcham Hub	Mo1 : Morden Regeneration Zone (formally Mo 4)	Mo5: Morden Road Clinic and Morden Hall Medical Centre
Site allocation	Mixed-use residential and community uses such as clinics, health centres, crèches, day nurseries, day centre or solely residential, subject to the existing training facility being provided	Residential.	Intensification of sporting activity on the wider Tooting and Mitcham Hub site may be supported by enabling development on this site subject to meeting planning policy, evidence and consultation. Any enabling	Mixed retail, office, commercial (including restaurants/cafes), community use (including health centre), transport infrastructure,	Healthcare led mixed-use scheme with residential or solely residential if an NHS primary healthcare facility with similar or

⁵ Following the stage 3 consultation, the council took the decision to swap the site allocation reference of Morden Regeneration and Chaucer Centre. .

	on a suitable site elsewhere within the borough.		development would be expected to directly fund long-term capital investment in sporting facilities on Tooting and Mitcham Hub	public realm and residential.	greater capacity is provided within Morden town centre.
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 34: Morden site allocations assessed against the SA Objectives (sites Mo1 – Mo5)

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

Figure 35: Raynes Park site allocations (RP1- RP5) assessed against the SA Objectives.

Raynes Park neighbourhood site allocations

Site ref.	RP1: Amity Grove Clinic.	RP2: 245 -247 Burlington Road.	RP3: Tesco, Burlington Road.	RP4: 80-86 Bushey Road.	RP5: All England Lawn Tennis Club Community Sports Ground 216 Grand Drive,
Site allocation.	Residential.	Commercial, business, service and community use appropriate to a residential area.	Comprehensive redevelopment of the site to keep the supermarket with the same floorspace as exists In a new, purpose-built unit and to optimise the rest of the site for delivering new homes, landscaping and access.	Site allocation: Residential-led mixed-use development with potential for ground and lower floors commercial, business, services and local community uses appropriate to a residential area.	Tennis facilities connected with AELTC's operation of The Wimbledon Championships, the Wimbledon Junior Tennis Initiative, community tennis programmes with support for continued and long-term investment in the same. The site can be found in designated open space with sport and recreation use that are compatible with open space designation.
SA objectives					
S01					
S02					
S03					
S04					
S05					
S06					
S07					
S08					
S09					
S010					
S011					
S012					
S013					
S014					
S015					

SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure 36: Raynes Park site allocations (RP6- RP8) assessed against the SA Objectives.

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

SO14			
SO15			
SO16			
SO17			
SO18			
SO19			
SO20			
SO21			
SO22			

Figure 37: Wimbledon site allocations assessed against the SA Objectives (Wi1- Wi8)

Wimbledon neighbourhood site allocations							
Site allocation >>>	W1 Battle Close, North Road	Wi2: Broadway Car Park,	Wi3: All England Lawn Tennis Club	Wi5: Hartfield Road Car Park	Wi6; Highlands House, 165-171 The Broadway	Wi7: Rufus Business Centre	Wi8: South Wimbledon Station
SA objectives							
SO1							
SO2							
SO3							
SO4							
SO5							
SO6							
SO7							
SO8							
SO9							
SO10							
SO11							
SO12							
SO13							
SO14							
SO15							

SO16							
SO17							
SO18							
SO19							
SO20							
SO21							
SO22							

Figure 38: Wimbledon site allocations assessed against the SA Objectives (Wi9- Wi16)

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

SO16							
SO17							
SO18							
SO19							
SO20							
SO21							
SO22							

Policy Map appraisal commentary

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

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

19.6 The Study aligns with other evidence base documents including the Playing Pitch Strategy (2019) and the Health and Wellbeing Strategy (2019) and supports the preparation of the Infrastructure Delivery Plan (IDP). In turn, this will aid in the justification of future development contributions and the collection and spending of the Community Infrastructure Levy (CIL). Sites designated as MOL (Metropolitan Open Land), Open Space, SINC (Site of Importance for Nature Conservation) and Green Corridors have been reviewed and proposed boundary are informed by the recommendations of the Study, London Plan and NPPF definitions and criteria of each type of open space. All sites, was reviewed in line with the criteria set out in the Green Infrastructure Study 2020.

19.7 [Other designations within the Policies Map informed by evidence-based studies such as the Strategic Flood Risk Assessment, London Plan and Historic England's heritage assets and Archaeological Priority Areas.](#)

20 Mitigating adverse effects

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

Air Quality, Noise and Pollution

20.2 The whole of borough is an AQMA (Air Quality Management Area) however; any development may result in an adverse impact because of demolition, construction and an increase in traffic. Therefore, an Air Quality Impact Assessment will be required for any development in areas that are identified in Merton's Air Quality Action Plan (AQAP) as an air quality focus area or if the type of development proposed may have an adverse impact or depending on the scale of the development for example the Morden town centre regeneration. Furthermore, we have adopted the London Plan's approach to Air Quality Positive and Neutral development. The Air Quality Neutral requirement also applies to

developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been, exploited, financial contributions to offset the impact of the development on air quality may be considered as a final intervention. The control of dust and emissions during construction and demolition will also need to be considered in the development proposals, reference should be made to Mayor's Supplementary Planning Guidance, Merton's Construction and Design Supplementary Planning Document (emerging) and Air Quality SPD (adopted 2021).

Climate Change and Energy

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

Transport

- 20.5 Any development proposals are required to make neighbourhoods a well-connected place where walking, cycling and public transport are the modes of choice when planning all journeys, in accordance with the London Plan. The council has adopted TfL's healthy streets approach, which puts people's health at the centre of how streets and public spaces are designed managed and used. Developments will be expected to demonstrate how their proposals will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. New streets should respect and link to the local neighbourhood they serve and provide good connections to community facilities and

shops, promote improved travel choice by creating an attractive, permeable, well designed and balanced environment.

- 20.6 Where a development proposal is likely to have a significant impact upon transport a Transport Assessment or Statement and other relevant documents including Travel Plans and Construction Management Plans will be required in accordance with TfL's Transport Assessment Guidance. Proposals for vehicular movement must be supported by appropriate traffic modelling, transport and assessment and travel plans and be in general compliance with transport policies, whilst aiming to achieve good vehicular permeability and convenience for residents.
- 20.7 The Transport Assessment or Statement will be required to identify if the transport impacts of a new development are likely to be 'severe' which may lead to the permission being refused unless adequate mitigating measures can be provided to address any adverse transport impacts. Mitigation measures may include financial contributions towards or direct provision of walking and cycling facilities, public transport services and highways improvements. Designs and layouts for new streets or highways improvement schemes should be designed in accordance with the latest best practice guidance. The Transport Statement or Assessment will need to set out how, the development supports the Healthy Streets Approach and The Mayor's Vision Zero target for road safety.

Waste Management

- 20.8 Any development will result in an increase in waste produced both in the construction and in operation of the development. All development proposals will need to comply with planning policies (national and regional) relating to waste management, as well as the South London Waste Plan. New development will be required to provide integrated, well-designed waste storage facilities that will include recycling facilities where appropriate. Construction Waste Management Plans will need to be submitted as part of proposals. [The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new South London Waste Plan \(SLWP\) covering the period 2021-36. Adoption expected in 2022 and it will replace the current SLWP 2011-211 introduced in 2012.](#)

Water Resources, Water Quality and Flood plain

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

Open Space and Biodiversity

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

Appendices

21 Appendix A: Baseline data.

Data limitations

- 22.1 Information or data used to help explain current situations or trends change over time. However, this does not necessarily link cause and effect overtly and is limited in how they can explain why particular trends are occurring and the secondary effects of any changes. The data therefore acts as an indicator and been selected to monitor progress towards the achievement of particular objectives and to provide a tangible measure concerning broader issues. This measure is often only a small part of meeting the objective so may simplify the issues and interactions.
- 22.2 The appraisal, therefore, relies on a mixture of quantified data and professional judgement. Accordingly, the baseline includes a commentary concerning the trend indicated by the current and historical data. External bodies collect much of the data used in this report for example Office of National Statics (ONS) and the Greater London Authority (GLA). The spatial and temporal data collected and future changes to the methodology of the data collect are not within the control of Merton Council. Please, note there are some gaps in the data collected, as not all information is consistently available. As part of the SA/SEA, process a Scoping Report including baseline data. For this report, the Council has carried out a summary update of the baseline data.

Merton the place

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

Figure 39: Borough of Merton



22.4

Merton is the one of the smallest boroughs in London with an area of 37 square kilometres. Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in

London. Around 18% of the borough's area is open space, compared to the 10% London average.

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

Environment baseline data

Green infrastructure and biodiversity

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

- Heath Scrub Maquis and garrigue *Phygrana* (5%)
- Dry grassland Steppes (45%)
- Improved grassland (3.5%)
- Broad-leaved deciduous woodland (45%)

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

22.11 Notified features of Wimbledon Common are:

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

22.12 Other key environmental assets of Wimbledon Common:

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

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

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

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

Figure 40: Wimbledon Common SSSI unit review

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

Source: Natural England (May 2018)

Nature Conservation and open space

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

Figure 41: Nature Conservation in Merton

Sites of Metropolitan Importance for Nature Conservation	5
Site of Borough (Grade1) Importance for Nature Conservation	11
Site of Borough (Grade1) Importance for Nature Conservation	25
Sites of Local Importance for Nature Conservation	22
Local Nature Reserves	15

Source: Merton Local Plan (2014)

Open space and recreation

- 22.16 Merton has 1,329 hectares of open space, which accounts for 35% of the borough. Of this, 21% is public open space. In comparison, London has 42% open space, and 18% public open space¹⁷. Merton's Open Space land cover is similar to neighbouring outer boroughs Kingston (37%) and Sutton (34%). The largest open spaces in Merton are Wimbledon Common and Mitcham Common, with other large clusters of open space in Morden Park, Cannon Hill and the Wandle Valley. Applying GLA population projections¹⁸, open space provision in 2018 is 6.3 hectares per 1,000 population, but with anticipated population growth (up to 2035), this will reduce to 5.6 hectares per 1,000 population. Using high and low population projections from Merton's Strategic Housing Market Assessment (SHMA) ¹⁹, future provision ranges from 5.3 to 5.9 hectares per 1,000 population.

Public Rights of way to access greenspaces

- 22.17 All the Public Rights of Way (PROW) in the borough come under the responsibility of Merton Council. There are approximately 32kms of public rights of way, which the council maintains. 12 Local authorities are required to assess the extent to which rights of way meet current and likely future needs of the public. Consideration must also be given to the opportunities provided by local rights of way, such as footpaths, cycle tracks, bridleways and restricted byways, for exercise and enjoyment of the area. A key responsibility is the assessment of the level of accessibility of local rights of way to those with restricted mobility with particular mention for those who are blind or partially sighted.

- 22.18 Merton as the Local Highway Authorities has a duty under the Wildlife and Countryside Act 1981 and the Highways Act 1980 to maintain and keep the definitive map and statement of public rights of way and to ensure that ways are adequately signposted, maintained and free from obstruction. Types of rights of way include:
- Footpath: When a path is used for walking only, it is a footpath. (This is different from the pavement alongside a road)
 - Bridleway: Bridleways are also footpaths, but additionally users are permitted to ride or lead a horse and ride bicycles. Horse drawn vehicles are not allowed. Cyclists must give way to pedestrians and horse riders. Motorcycling is not allowed.

Conservation Areas and Historic Parks and Gardens

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

Figure 42: Merton’s Historic Parks and Gardens

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

Listed Buildings, Scheduled Ancient Monuments and Historic Sites

- 22.20 Merton has a rich heritage of buildings, which are of historical or architectural interest. A number of these buildings have been recognised as having a special architectural or historic interest and have been included on the statutory list that is compiled and managed by Historic England.⁶ Currently Merton has around 250 statutory listed buildings.

⁶ <https://historicengland.org.uk/>

- 22.21 Scheduled monuments are not always ancient, or visible above ground. There are over 200 categories of monuments on the Schedule and they, range from prehistoric standing stones and burial mounds, through to the many types of medieval site (for example Merton Priory – an Augustinian priory). In Merton there are 3 Scheduled Ancient Monuments they are:
- Caesar’s Camp, Wimbledon Common
 - Merton Priory, South Wimbledon/Colliers Wood
 - Morden Park Mound, Morden

Historic Sites

- Southside House, Grade II* visitor attraction
- National Trust, Morden Hall / Watermeads
- Merton Abbey Mills

22.22 In Merton there are 4 registered museums in the borough:

- All England Lawn Tennis Museum
- Wandle Industrial Museum
- Wimbledon Society Museum of Local History
- Wimbledon Windmill

Archaeological heritage

22.23 Merton's historic environment bears more than 10,000 years of human activity, ancient sites, monuments and landscapes, historic settlements, ancient features and finds. Remains of early settlements have also been found along the course of the River Wandle and Roman coins and pottery have been found in the vicinity of the Roman Road and Roman burials have also been discovered in Mitcham. [Work published in 2016 by Historic England](#) shows Merton has 23 Archaeological Priority Areas covering approximately 38% of Merton. Of which four are in Tier 1 (areas known or strongly suspected to contain nationally important archaeology) 16 are in Tier 2 (likely to contain archaeological interest) and three are in Tier 3 (a landscaped scale zone that may hold archaeological interest) Merton has 20 areas designated as Archaeology Priority Areas Zones (APZs) arranged under a number of archaeological themes.

Figure 43: Archaeological Priority Areas Zones

Tier	Name of Archaeological Priority Area	Description of site APA
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Tier 1	Caesar's Camp	.A circular Iron Age hillfort known as Caesar's Camp is located on Wimbledon Common. The hillfort itself is a Scheduled Monument but the APA also covers its immediate surroundings. The APA is classified Tier 1 because it includes a Scheduled Monument and its immediate setting which may contain associated archaeological remains.
	Merton Priory	The APA covers the principal areas of the Augustinian Priory of St Mary Merton. It includes the scheduled area for the Priory and is bounded by the Wandle River to the east and north and a stream known as the Pickle to the west and south. While parts of the Priory's precinct walls extended to the south and west of the APA, the locations of the majority of monastic buildings were situated within the APA boundary. The APA is classified as Tier 1 because it includes a scheduled site which has associated archaeological remains in its vicinity
	Morden Park Mound	The APA covers the scheduled site of Morden Park Mound which is located within Morden Park. It has been classified as Tier 1 because it is a scheduled site
	Ravensbury Saxon Cemetery	The APA covers the approximate location of the Ravensbury Saxon cemetery, which was excavated in various stages in the late 19th and early 20th centuries. The cemetery was spread across an area that is roughly bordered by the Tramlink to the north, Ravensbury Path and Denvale Trade Park to the west, Heatherdene Close and Ravensbury Park to the south and London Road to the east. It is classified as Tier 1 because surviving remains of the cemetery would be especially vulnerable and could be judged equivalent to a Scheduled Monument.
Tier 2	Wandle Valley / Colliers Wood	The APA follows the course of the Wandle River between the railway line at the northern edge of Wandle Meadow Nature Park and Morden Hall Park. It surrounds the Tier 1 APA for Merton Priory and remains of the Priory's outer precincts may be located within it. It is classified as Tier 2 because it is an area of historic industry and also because of the concentration of earlier sites around the crossing point of Stane Street over the Wandle. It is one of four APAs which cover the River Wandle as it passes through Merton
	Wandle Valley / Morden Hall Park	The APA covers Morden Hall Park and extends into an area to the northeast of the modern Tramlink tramlines to the south of Phipps Bridge. The Park was not enclosed until the 1870s and prior to this, this stretch of the River Wandle was characterised by a significant number of important mills and factories. The owners of the mills and factories also built grand country houses within the APA, sometimes. The APA is classified as Tier 2 because Morden Hall Park is a Grade II Registered Park and Garden with significant archaeological interest and it is an area of historic industry. It is one of four APAs which cover the River Wandle as it passes through Merton
	Wandle Valley / Mitcham	The APA follows the route of the River Wandle from Ravensbury Mill near Morden Road to the

		borough boundary with Sutton to the southeast. It is classified as Tier 2 because it is an area of historic industry. Within the APA, different mills and factories were built, rebuilt or adapted and demolished owing to numerous factors such as fire damage, economic downturns or change of use, all of which add to their interest and history. The presence of a sizeable Anglo-Saxon cemetery nearby as well as a number of prehistoric archaeological finds demonstrates the multi period activity in this area. The exact location of a settlement associated with the Saxon cemetery is currently unknown but it could be located within the APA. The APA is one of four which cover the river Wandle as it passes through Merton
	Wimbledon Common	The majority of Wimbledon Common lies within Merton and the Wimbledon Common APA covers the majority of this area with the exception of the areas covered by the Beverley Brook and Caesar's Camp APAs. It is classified as Tier 2 because it is an extensive area of undeveloped land associated with a known heritage asset of national importance.
	Merton Village	The Merton Village APA covers the approximate area of the historic settlement of Merton. It extends as far west as the railway lines, as far north as Henfield Road and Kingston Road, as far east as Kirkley Road and as far south as Erridge Road and the John Innes Park Recreation Ground. The APA is classified Tier 2 because it is an area of historic settlement dating to the medieval period or earlier.
	Mitcham	The APA covers the historic settlement of Mitcham along the route of London Road from its junction with Bond Road in the north to Mitcham station in the south. It includes the areas around the Upper Green, previously known as Upper Mitcham, the Lower Green/Cricket Green, previously known as Lower Mitcham and the Church of St Peter and St Paul. The Mitcham APA is classified as Tier 2 because it is an area of historic settlement.
	Morden	The APA covers the site of the historic settlement of Morden to the south-east of the area now regarded as the core of Morden town centre. It covers an area on either side of Epsom Road/London Road close to its junction with Central Road and a sizeable section of Morden Park. The APA is classified Tier 2 as it is an area of historic settlement
	Wimbledon Village	The Wimbledon Village APA covers an area between the junction of Parkside and Somerset Road in the north and the junction of Wimbledon Hill Road and Worple Road in the south. It also extends to the north-east to include the site of St Mary's Church. Wimbledon Village, at the summit of the hill, was the original settlement known as Wimbledon before the arrival of the railway in the 19th century moved the focal point of the town to the bottom of the hill. The APA is classified as Tier 2 because it is an area of historic settlement.
	Cannizaro	The Cannizaro APA covers Cannizaro Park, Rushmere Green and an area to the south of both of those areas. The Causeway and Camp Road to the north, Lingfield Road and Parkside to the

		east, Ridgway and Copse Hill to the south and Wimbledon Common to the west, bound it. It is classified Tier 2 because it includes the sites of several historic country houses with their associated grounds, gardens and estates which can be considered heritage assets with historic and archaeological significance
	Canon Hill	The APA covers Cannon Hill Common and is bounded by Cannon Hill Lane, Parkway, Messines Playing Field and Joseph Hood Recreation Ground. Cannon Hill House was built here in the second half of the 18th century and was demolished in the first half of the 20th century. The APA is classified Tier 2 because Cannon Hill House was a post medieval country house and any remains are likely to be well preserved
	Merton Place	The APA covers the area bounded by Merton High Street to the north, Abbey Road to the east, High Path to the south and Pincott Road to the west. The APA occupied by the High Path Estate but was formerly the site of Merton Place and its grounds. It is classified as Tier 2 because it is a heritage asset of historic significance and value due to its link with Vice Admiral Horatio Lord Nelson
	Wimbledon Park House	The APA covers Wimbledon Park and a section of the residential area that lies to the south of the park. The area represents land covered by the grounds of Wimbledon Park House. It is classified as Tier 2 because it covers the site of a heritage asset of archaeological and historic interest and a Grade II* Registered Park and Garden with archaeological interest
	Lavender Park	The APA covers the site of Lavender Park and extends into an area at the eastern end of Prince Georges Road. Lavender Park was formerly part of King's College Sports Ground. It is classified as Tier 2 because evidence of a significant Bronze Age settlement has been found in this area
	West Barnes Farm	he APA is located between Bushey Road, West Barnes Lane, the A3 and the Pyl Brook. Most of the area is occupied by Raynes Park High School. It is classified as Tier 2 because it was the site of a medieval farm
	Stane Street	The APA follows the route of the Roman road known as Stane Street, which runs from London to Chichester and crosses the borough from north-east to south-west. The route of High Street Colliers Wood follows the route of Stane Street from the borough boundary with Wandsworth as far as Colliers Wood Station. After this point, Stane Street continued in a straight line towards Pylford Bridge in the southwest and crossed through the area that was later to become the site of Merton Priory. It ran slightly to the west of Stonecot Hill and its route to the south approximately follows the borough boundary between Merton and Sutton. It has been classified as Tier 2 because it is a corridor of land flanking the route of a Roman road with the potential to

		reveal elements of the road itself or of roadside activity and settlement.
	Merton 19 th century cemeteries	This APA covers two 19th century cemeteries, which are not otherwise covered by an Archaeological Priority Area. The APA is classified as Tier 2 because it covers burial grounds with 19th century origins. Both of the cemeteries are open to the public and still accept new burials.
Tier 3	Wandle Valley / Earlsfield	The APA follows the course of the River Wandle from just north of Earlsfield station to where it passes under the railway between Haydons Road and Tooting stations. It is classified as Tier 3 because it is a topographical zone with high potential for preservation of organic remains associated with a riverine environment. It is one of four APAs which cover the Wandle as it passes through Merton
	Beverley Brook	The APA covers an area on the eastern side of Beverley Brook, which marks part of the borough boundary between Merton and Kingston upon Thames. It is classified as Tier 3 because alluvial deposits along this stretch of Beverley Brook may contain or preserve archaeological evidence of past human activity
	Mitcham Common	Mitcham Common consists of approximately 460 acres within the London Borough of Merton although it used to extend into areas within the boroughs of Sutton and Croydon too. The APA covers an area between the borough boundary between Merton and Sutton to the south, Commonsides West and Carshalton Road to the west and Commonsides east to the north east. It is classified as Tier 3 because it is an extensive undeveloped area with potential for surviving archaeological remains

Type of Archaeological Theme	Name of Archaeological Priority Area Zone (APZ)	Description of site-APA
Alluvial	Wandle Valley Alluvium	This area includes the alluvial silts deposited within the Wandle Valley. Evidence for both prehistoric human activities and the contemporary natural environment can be preserved within or beneath the alluvial deposits.
	Beverley Brook Valley Alluvium	This area maps the extent of alluvial deposits along the course of the Beverley Brook. Although this area is thought to have played a less significant role than the Wandle Valley in the history of the area, it has potential for the survival of evidence of past

		environments as well as prehistoric (and later) human activities.
Prehistoric Landscapes	Wimbledon Common	The status of Wimbledon Common itself means that there has been relatively little archaeological work in this area, but stray/casual finds have demonstrated that evidence covering the whole prehistoric period may be anticipated to survive as buried remains. The Priority Zone Designation extends beyond the modern limits of the Common to include additional areas where archaeological evidence for prehistoric landscapes has been shown to survive.
	Mitcham Common	This area takes in a swathe of gravel terrace on the eastern side of the Wandle Valley. Finds of Mesolithic and Neolithic flint tools, Bronze Age metalwork, and stray Iron Age coins have been recovered from this area, demonstrating the area's significance for early settlement and indicating its potential for the survival of further remains.
	Morden Park	This area encompasses the northern part of the modern Morden Park, where remains of Roman and medieval date have been found. The Park contains a Scheduled Monument 'Morden Park Mound', thought possibly to be (or to incorporate) a Roman burial mound, or to be an eighteenth-century prospect mound created within Morden Park.
Settlements	Merton Village (South Wimbledon area towards Wimbledon Chase)	The medieval estate of Merton originated in the later Saxon period and is first referred to by name in a document of 949 AD. By the time of the Domesday Survey of 1086 the estate included a church and two mills, set within extensive agricultural land.
	Wimbledon	The historic village core occupies higher ground on the watershed between the valleys of the Wandle and the Beverley Brook. Wimbledon is not mentioned in the Domesday Survey and it may have formed an outlying grange of the extensive Mortlake estate at that time. Wimbledon is, recorded as a separate unit from the early fourteenth century onwards.
	Mitcham	The earliest historical reference to Mitcham settlement comes from an eighth-century document, although archaeological evidence also points to unconnected Roman and early Saxon activity in the area. The medieval village developed as a 'ribbon' settlement along the London-Sutton Road, with two foci: Upper Green (probably also known as Michelham) and Lower Green (also known as Wickford Green).
	Morden	The estate of Morden is first, referred to in the tenth century and appears to have remained polyfocal with a particular cluster in the vicinity, of the church throughout the medieval and post-medieval periods (this may be partly explained by its location on

		London Clay based soils rather than more easily cultivated gravels or river alluvium deposits). There was a second settlement at Lower Morden, near the Beverley Brook— this is, identified as a separate Priority Zone (Map Area 11).
	Cannon Hill	An indication of human activity in this area on John Rocque's maps of 1749-62 suggests that this area may contain important remains.
	Lower Morden	Medieval finds have been, recovered from this area, indicating early human activity.
	West Barnes	This zone covers the location of West Barnes Farm, a Medieval, probably moated, 'Grange' belonging to Merton Priory
Settlement- Communications Routes	'Stane Street'	The line of an important Roman road, crossing the Borough between Colliers Wood and Pylford Bridge. The route of the road is preserved in part by modern streets (High Street Colliers Wood, and parts of London Road, Morden— both parts of the A24), although it appears to have taken a more direct route across Wandle Valley than the present A24 (which runs to the north through Merton).
	Wandle/Copper Mill Lane	A centre of water powered and water utilising industry from at least the medieval period onwards, this area included medieval corn mills and an eighteenth-century copper mill. The latter was found at the end of Copper Mill Lane and was replaced, in the nineteenth century by a mill for the processing of leather
	Wandle/Colliers Wood	This area has formed a particular focus for riverside industry from at least the medieval period onwards, with several corn mills being, found along this stretch of the river during the medieval period. These were supplanted in the post-medieval period by textile processing and finishing industries, initially calico-bleaching and printing and subsequently the textile printing works of Arthur Liberty and of William Morris
	Wandle/Mitcham	The Wandle Riverside around Mitcham was, famed in the eighteenth and nineteenth centuries for the market gardening of aromatic and medicinal herbs, watercress and other crops. It was also important in the seventeenth and eighteenth centuries for calico bleaching and printing, copper, flour, and snuff milling, leather working and the manufacture of paper, flock and felt.
Riverside Industries	Mill Corner	Documentary sources indicate the presence of a water mill on this part of the Beverley Brook in the fifteenth century, and a series of fishponds. The mill appears to have been demolished sometime before the eighteenth century.
	Merton Place	Built around 1700, between the village of Merton and the River Wandle, possibly on the

Post Medieval Estates and Gardens		site of an earlier, medieval, moated structure. The house is noted as being the only house owned by Admiral Nelson who converted the moat into a garden feature and called it 'The Nile'.
	Wimbledon Park House	The house was originally built in 1588 but was much altered in the 1640s by Inigo Jones. The site of the early House is not known with certainty, but it is thought to lie close to the village church.
	Morden Hall and Park	The existing Morden Hall dates from the mid-eighteenth century, replacing an earlier, Tudor Manor House to the south. The Hall is moated and the moat is an eighteenth decorative feature contemporary with the house.

Blue infrastructure

Rivers

- 22.24 The River Graveney flows in an approximately east to west direction along the northern boundary of Merton. The area to the northeast of Mitcham Eastfields railway station to be defined as Flood Zone 2 associated with the River Graveney, extending towards Oakleigh Way Recreation Ground and the northern part of Figge's Marsh. Beverley Brook is a minor English river 14.3 km (8.9 mi) long in southwest London. The Beverley Brook flows in an approximately south north direction along the western boundary of Merton and eventually discharges into the River Thames at Barnes. It rises in Worcester Park and joins the River Thames to the north of Putney Embankment at Barn Elms.
- 22.25 The Pyl Brook is a tributary of the Beverley Brook. The Pyl Brook rises to the south of Sutton Common train station before flowing in an approximately southeast to northwest direction through Merton and connecting to the Beverley Brook in Beverley Park on the western boundary of Merton. An approximately 600m section of the Pyl Brook running adjacent to West Barnes Lane is culverted between Kingsway and Raynes Park High School. The Derwent Road Flood Storage Area provides additional storage from the Pyl Brook during periods of high flow. Areas surrounding Raynes Park High School, Memorial Ground, Westway and West Barnes Lane are defined as Flood Zone 3 associated with the Pyl Brook. Areas surrounding Cannon Hill Lane and Lower Morden Road are defined as Flood Zone 2. Appendix 1 Maps: identifies the rivers and flood zones in Merton.

Ordinary watercourse⁷ and reservoirs

- 22.26 In total there is approximately 69km of ordinary watercourse in Merton, approximately 5km of which is culverted⁸. The majority of watercourses are in Wimbledon Common, Mitcham Common, Raynes Park area, Cannon Hill Common and Wimbledon Park. Merton has 1 reservoir, Wimbledon Park Lake as defined under the Reservoir Act 1975 which is raised.
- 22.27 The lake in Wimbledon Park dates to 1765 when it was, created for the first Earl Spencer as the central feature of a landscaped park in front of the family's mansion house located on the high ground up what is now Church Road towards Wimbledon Village. Responsibility for design was, given to Lancelot 'Capability' Brown, was, then and still now, acknowledged as one of England's foremost landscape architects. 'Capability' Brown spent some 20 years transforming the formal Renaissance Gardens into a more natural landscape, including building a dam across the valley to convert a marshy stream and surrounding bog into an impressive 30-acre lake. The lake passed into public ownership in the early 20th Century when it was, purchased by the forerunner of Merton Council. Since then, the lake has been, used primarily as a reservoir and for leisure purposes including swimming, water sports and angling. The council has a Statutory and legal obligation to maintain the reservoir under Section 10 of the Reservoirs Act, 1975.

River biodiversity

- 22.28 The River Wandle is naturally a chalk stream and described as a rare and unique type of river. However, the long-standing urban nature of the river has resulted in certain stretches being healthier than other parts of the river, with weirs commonly preventing fish from moving freely along the river.
- 22.29 The Environment Agency and partners are studying the options for improving fish movement up and down the River Wandle. An increase in fish passage will be required to enable the River Wandle to meet objectives set by the Water Framework Directive. In 2013 the Environment Agency fisheries survey on the River Wandle through Merton revealed a diverse fish population including:
- chub
 - roach
 - eel
 - gudgeon
 - dace
 - perch
 - dace
 - carp bullhead

⁷ A **watercourse** that is not part of a main river... all rivers and streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public. sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.'

⁸ A culvert is a structure that allows water to flow under a road, railroad, trail, or similar obstruction from one side to the other side. Typically embedded so as to be surrounded by soil, a culvert may be made from a pipe, reinforced concrete or other material.

- stone loach

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

Water supply and wastewater treatment

Water supply

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

22.32 The majority of Merton falls within Thames Water Utilities Ltd (known as Thames Water) resource zone apart from some areas near the borough boundary with Sutton. Merton's average water consumption is 160 litres per day (160/l/d) (2012), which is slightly above the London average (164/l/d), with around 25% of households with water-meters installed within their homes, an increase of 15% from 2001/01. Merton's population, as with the rest of the London population, mainly rely on water supplies that have originated from outside London. Fifty – five percentage of the available water lies within the Thames Basin, 80% used for public water supply purpose.

Sewage treatment works

22.33 Merton is served by "Crossness" sewage treatment works; in 2009 it served a population of 1, 1890,000. Crossness is, permitted to discharge 1,485,00m³/d of treated sewage effluent into the Thames Tideway. There are planned upgrades which will provide sufficient treatment at Crossness to ensure that it can cope with London's growing population to at least 2021 whilst improved quality effluent to meet water quality requirements. The improvements will enable the site to treat 44% more sewage than at present. This increase in treatment capacity will allow for a 6% increase in population until 2021.

Energy use and supply

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

Noise and Vibration

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

- neighbour noise: which includes noise from inside and outside people's homes
- neighbourhood noise: which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street

Air Quality

- 22.40 Pollution in Merton comes from a variety of sources. This includes pollution from sources outside of the borough and in the case of particulate matter; a sizeable proportion of this comes from outside London and beyond the UK (United Kingdom). Of the pollution that originates in the borough, the main sources of NO₂ are transport (57.1%), domestic gas boilers (18.8%) and static non-road mobile machinery (11.6%).
- 22.41 The main sources of particulate matter are road transport (50.4%), re-suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). In respect of the transport sources, apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NO_x emissions and 80% of the PM₁₀ emissions (based on 2013-modelled data). This supports the evidence from the dispersion modelling (Appendix B) which shows that the highest concentrations of both NO₂ and PM₁₀ are most strongly associated with the main traffic routes and road junctions within the borough.
- 22.42 The Greater London Authority (GLA) identified Air Quality Focus Areas in 2014. These locations not only exceed the EU annual mean limit value for NO₂ but are also locations with high human exposure. The Focus Areas were, defined to address concerns raised by boroughs within the Local Air Quality Management process and forecasted air pollution trends. This is not an exhaustive list of London's hotspot locations, but where the GLA believe the problem to be most acute.

Figure 44: Merton Air Quality Focus Areas

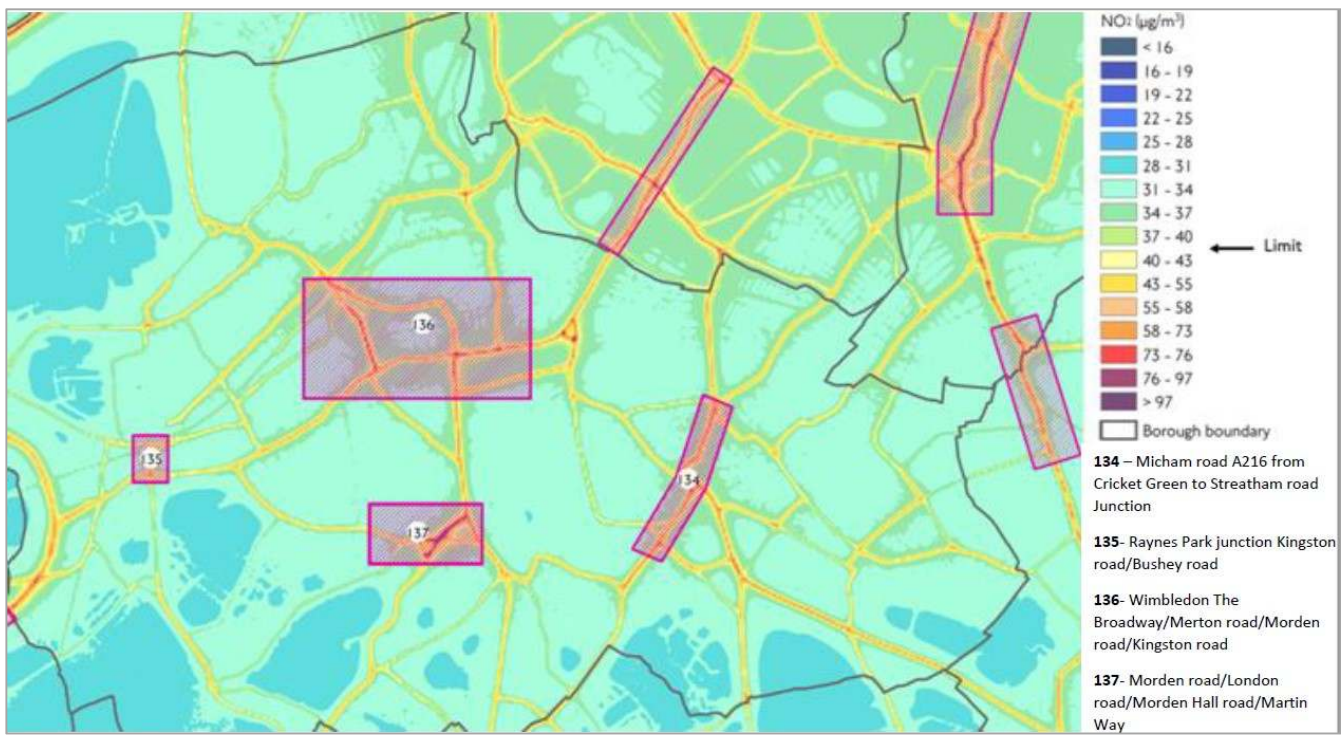
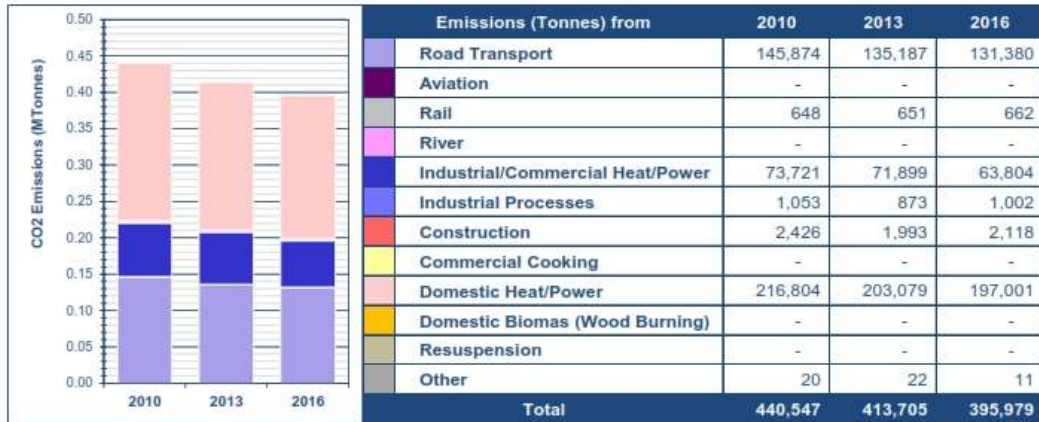


Figure 45: CO2 emissions by source type

LONDON ATMOSPHERIC EMISSIONS INVENTORY (LAEI)

CO2 Emissions by Source Type - Merton



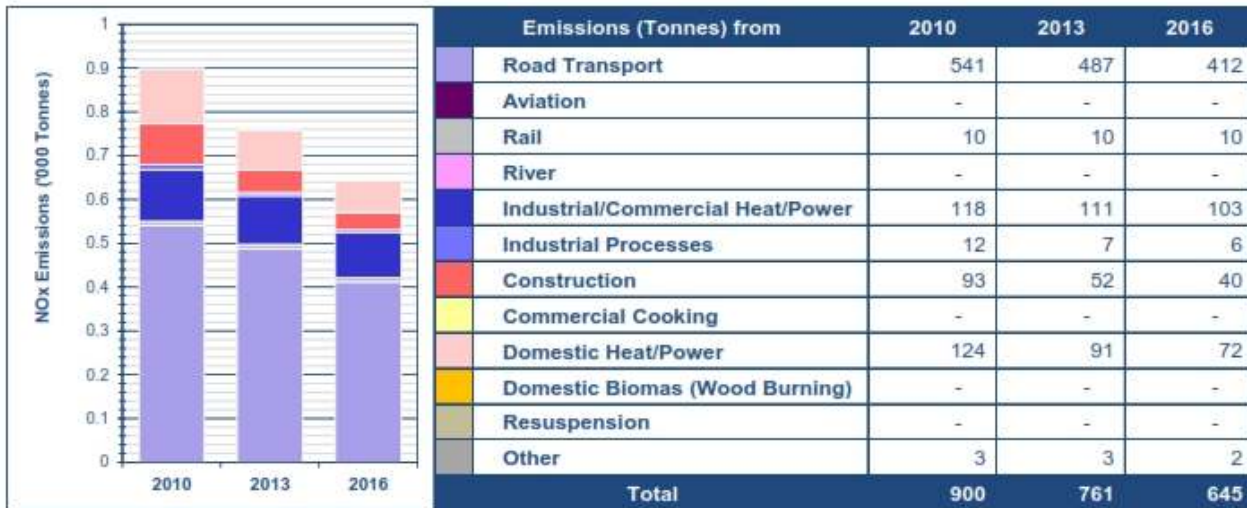
The bar chart represents emissions from each air pollution source stacked on top of one another, with the total stack height equalling total emissions from all sources across the Borough. The numbers in the table are those used to plot the graph and represent, for each year, the amount of pollutant emitted into the atmosphere (in tonnes/year).

- Industrial Processes: includes emissions from Part A1, A2/B processes, and from Non-Road Mobile Machinery (NRMM) exhaust on industrial sites.
- Heat/Power generation: includes emissions from the combustion of gas, oil or coal in the Industrial/Commercial and Domestic sectors respectively.
- Construction: includes construction dust (PM) and NRMM exhaust on construction sites.

Figure 46: NOX (nitrogen oxides) emissions by source

LONDON ATMOSPHERIC EMISSIONS INVENTORY (LAEI)

NOx Emissions by Source Type - Merton



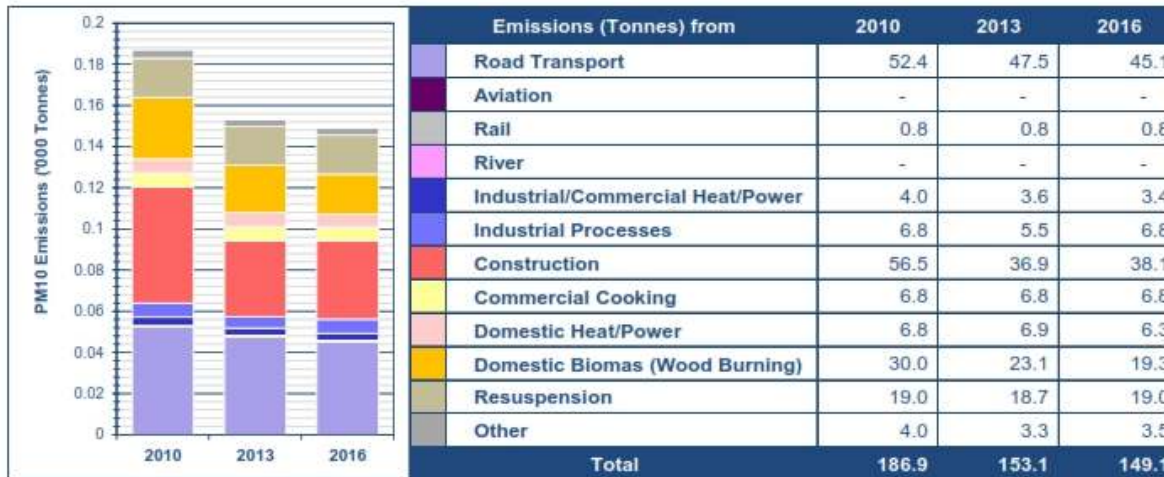
The bar chart represents emissions from each air pollution source stacked on top of one another, with the total stack height equalling total emissions from all sources across the Borough. The numbers in the table are those used to plot the graph and represent, for each year, the amount of pollutant emitted into the atmosphere (in tonnes/year).

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- Heat/Power generation: includes emissions from the combustion of gas, oil or coal in the Industrial/Commercial and Domestic sectors respectively.
- Construction: includes construction dust (PM) and NRMM exhaust on construction sites.

Figure 47: PM10 emissions by source

LONDON ATMOSPHERIC EMISSIONS INVENTORY (LAEI)

PM10 Emissions by Source Type - Merton



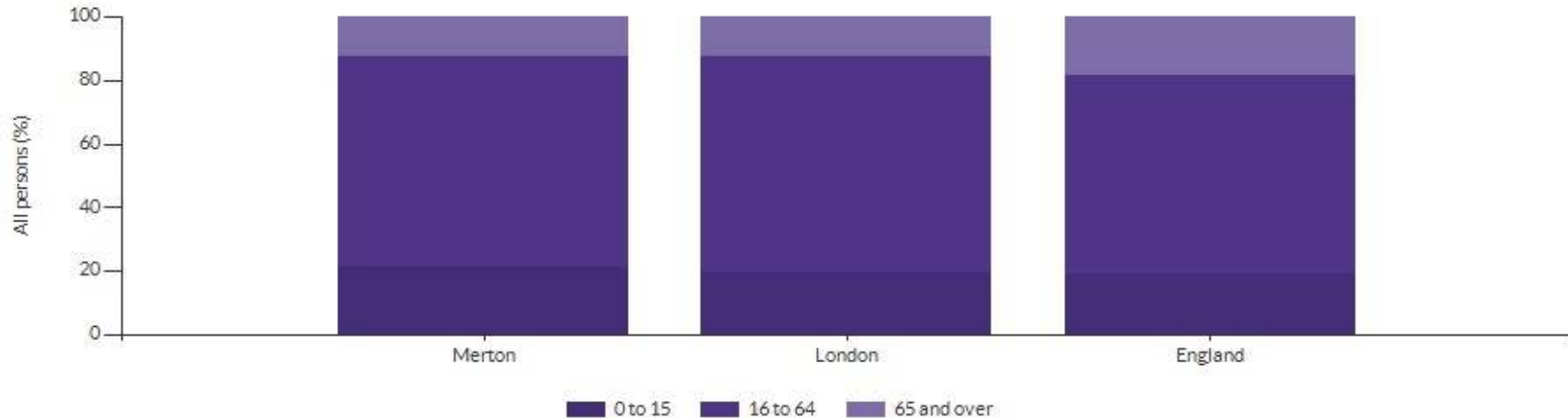
The bar chart represents emissions from each air pollution source stacked on top of one another, with the total stack height equalling total emissions from all sources across the Borough. The numbers in the table are those used to plot the graph and represent, for each year, the amount of pollutant emitted into the atmosphere (in tonnes/year).

- Industrial Processes: includes emissions from Part A1, A2/B processes, and from Non-Road Mobile Machinery (NRMM) exhaust on industrial sites.
- Heat/Power generation: includes emissions from the combustion of gas, oil or coal in the Industrial/Commercial and Domestic sectors respectively.
- Construction: includes construction dust (PM) and NRMM exhaust on construction sites.

Populations

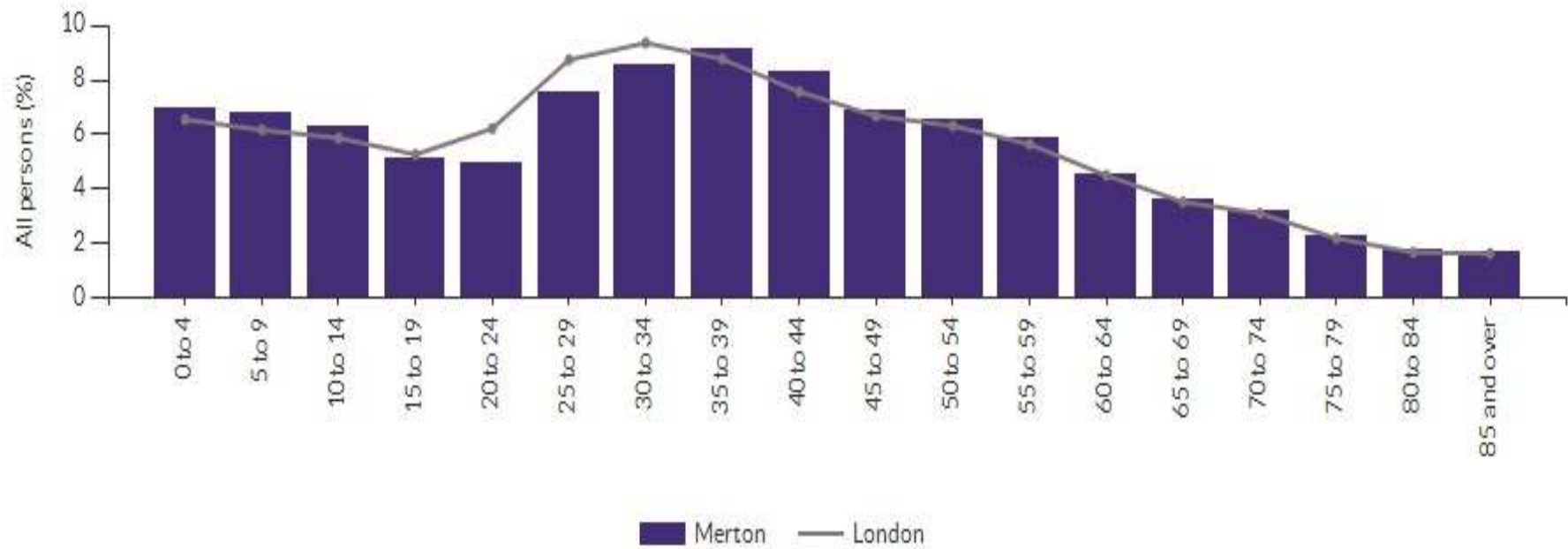
22.43 Merton's population is, projected to increase to 222,717 by 2025 and 232,473 by 2030. The age profile is, also predicted to shift with a notable growth in the proportion of the population that are under the age of 16 and those over 50 years old. The number of households is, projected to rise to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

Figure 48: Population projections (Housing-Led)



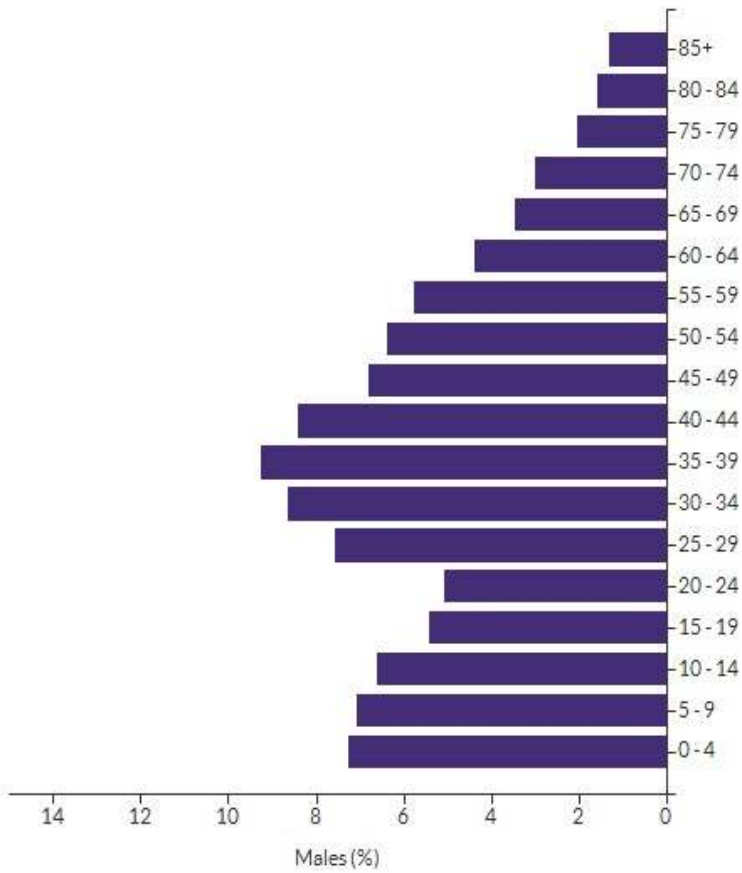
Date: 2020 Source: GLA

Figure 49: Population projection for all persons by 5-year age group

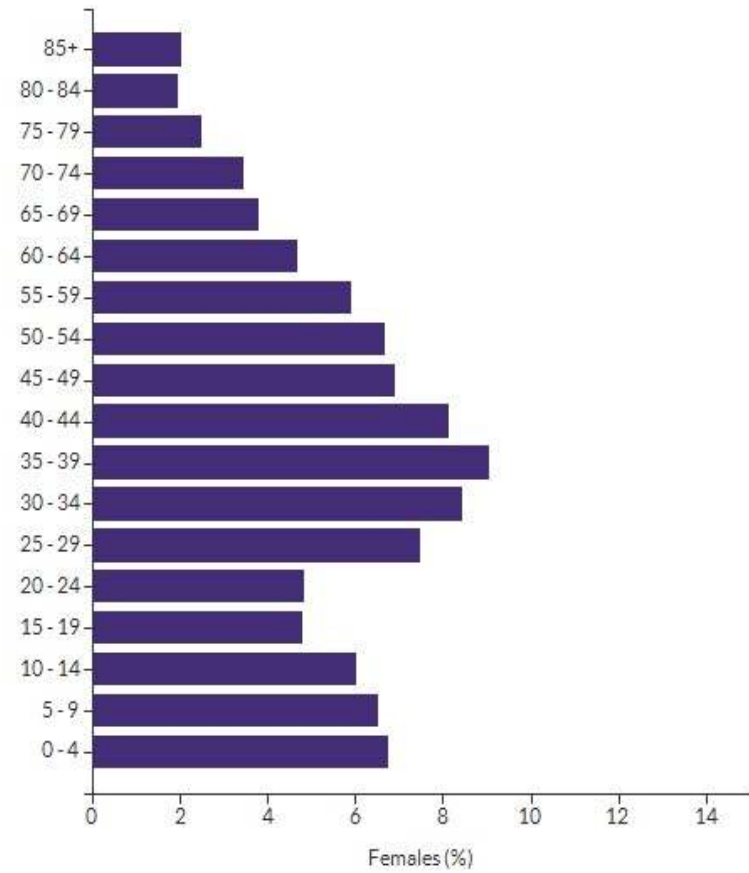


Date: 2020 Source: GLA

Figure 50: Population projection for males and females



Date: 2020 Source: GLA

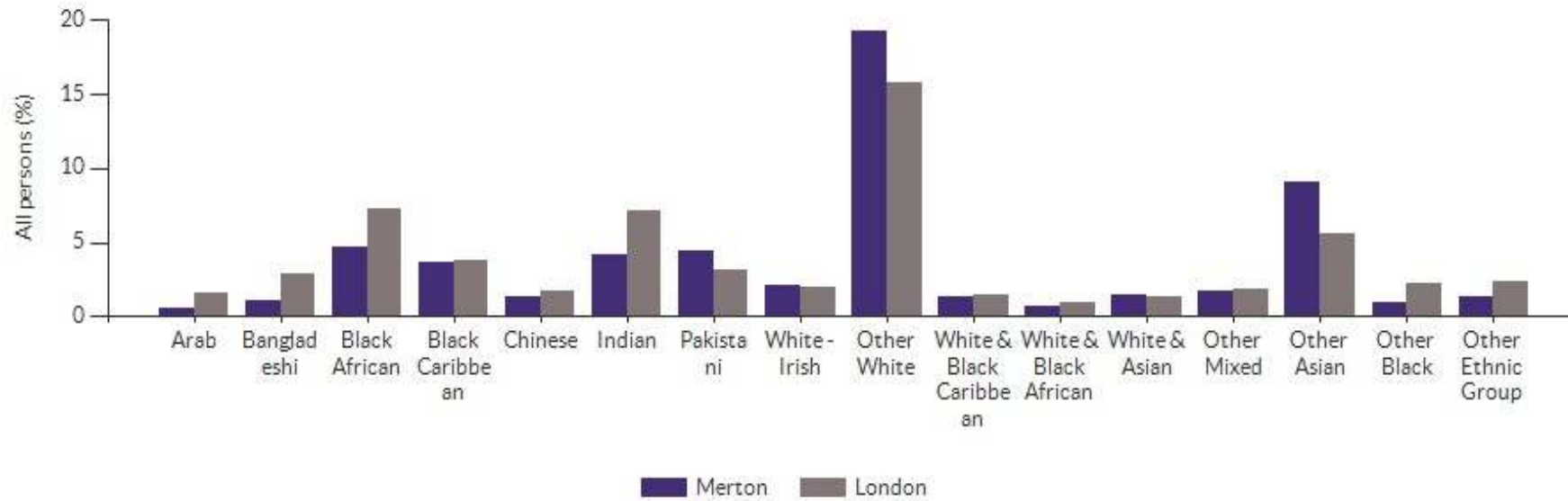


Date: 2020 Source: GLA

22.44 Merton has a diverse mix of ethnic groups, culture, and languages. GLA data in 2020 puts Merton's Black, Asian and Minority Ethnic

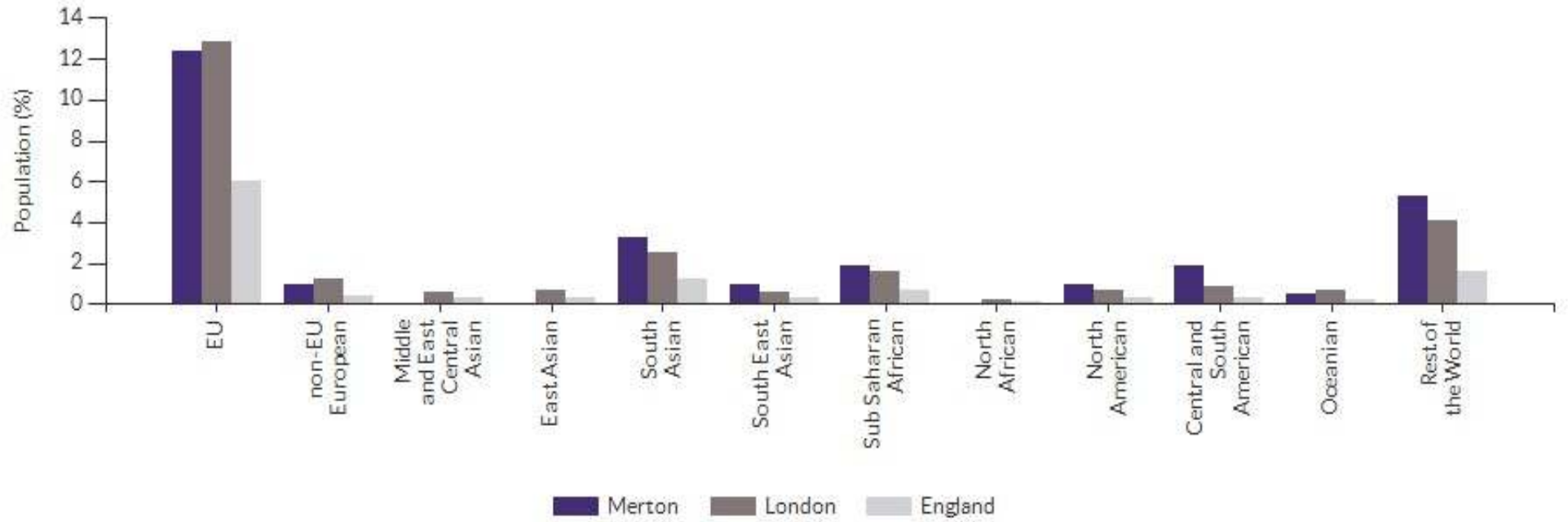
(BAME) population as 78,390, meaning BAME groups make up just under 37% of the population.

Figure 51: Projected ethnic make -up



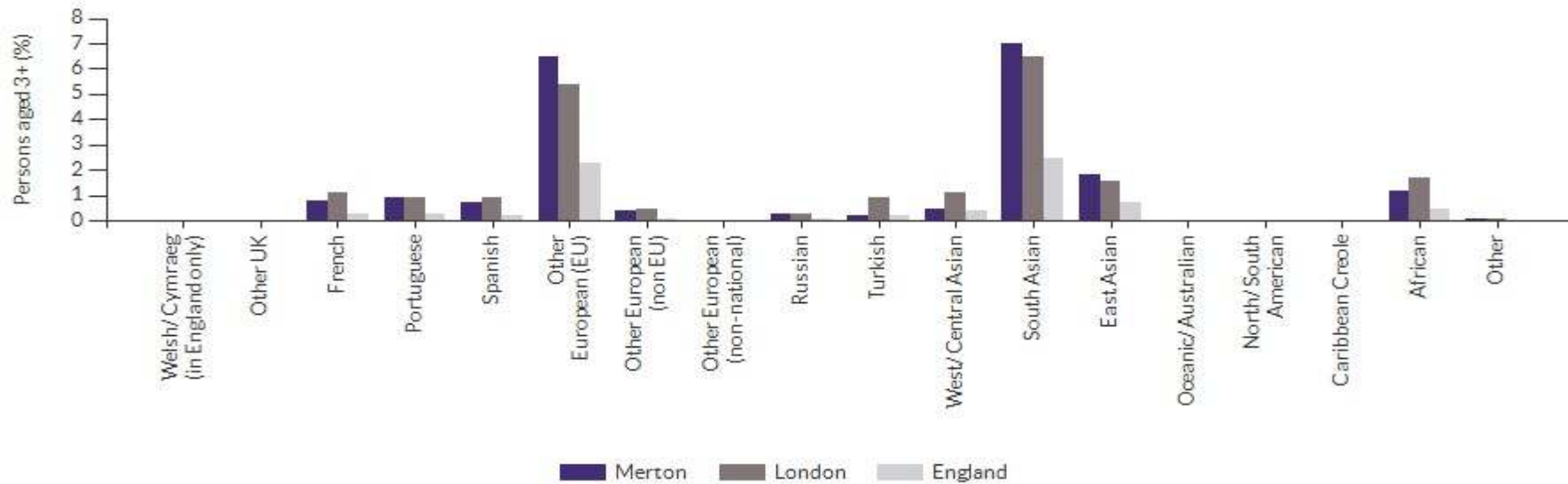
Date: 2020 Source: GLA

Figure 52: Population by nationality (excluding UK)



Date: 2019 Source: ONS

Figure 53: Main languages spoken in Merton



Source: ONS Census 2011

Housing

22.45 The London Plan identified the need for 66,000 additional homes per year across London. Merton’s ten-year London Plan housing target is 9,180 (918 per year). The 2019 Merton Strategic Housing Needs Assessment (SHNA) identified a need for more homes of all types and sizes throughout the borough. It is, anticipated that new homes will be concentrated around existing town centres and areas with good access to public transport and local services; these include Mitcham, Morden, Colliers Wood, South Wimbledon, Wimbledon and Raynes Park sub areas⁹.

⁹ <https://data.merton.gov.uk/housing/>

- 22.46 The affordability ratio in Merton is higher than both London and England, so lower-income residents and first-time buyers may struggle to get on the property ladder¹⁰. Expensive housing is likely to push low-income households in to overcrowded and unsuitable conditions. Average rental prices have increased 39% over the last 10 years ¹¹. Housing is more expensive in the west of the borough with Wimbledon Village having some of the highest house prices in the country. Prices are cheaper in the east but are still significantly higher than national averages.
- 22.47 The COVID-19 pandemic has affected the cost of housing in Merton with rises of 13% between June 2020 and June 2021. This is likely due to Merton's suburban nature as homeowners look for larger properties and more outside space in response to the lockdown.
- 22.48 In 2021, there were 9,125 households on the Councils Housing Register (households waiting to be housed by the local authority) including accepted homeless households and only 191 social housing homes that became available for letting. The greatest need on the housing register is two- and three-bedroom homes, while most of the available homes are one-bedroom properties. Additionally, there were 153 accepted homeless households. There was a reduction in the number of households on the register from 2019/20 following installation of new housing system. All households were, written to and asked to update their Choice Based Lettings (CBL) details. Households who did not update their details, or whose letters returned were, removed from the register. Over 4,500 households on the Register experienced overcrowding as their primary need. Rates of overcrowding are higher in the east of the borough than the west.
- 22.49 Most recent data show that 7.2% of Merton households are overcrowded. This is slightly lower than the London average but significantly higher than the national rate of 3%¹². Rates of overcrowding are higher in the east of the borough than the west.

Homelessness in Merton

- 22.50 Rates of households in temporary accommodation in Merton are lower than the London average with 1.9 households per 1000. There are currently 260 children in temporary household accommodation in Merton, which is the lowest rate in London¹³. Although Merton's levels of homelessness and use of temporary accommodation is low, homelessness applications due to evictions are expected to rise following the ending of the evictions moratorium (31 May 2021). This will likely increase pressure on council services, at a time compounded by the government's 'everyone in' principle where Councils had to arrange temporary accommodation for all rough sleepers in their areas, to limit spread of Covid-19.

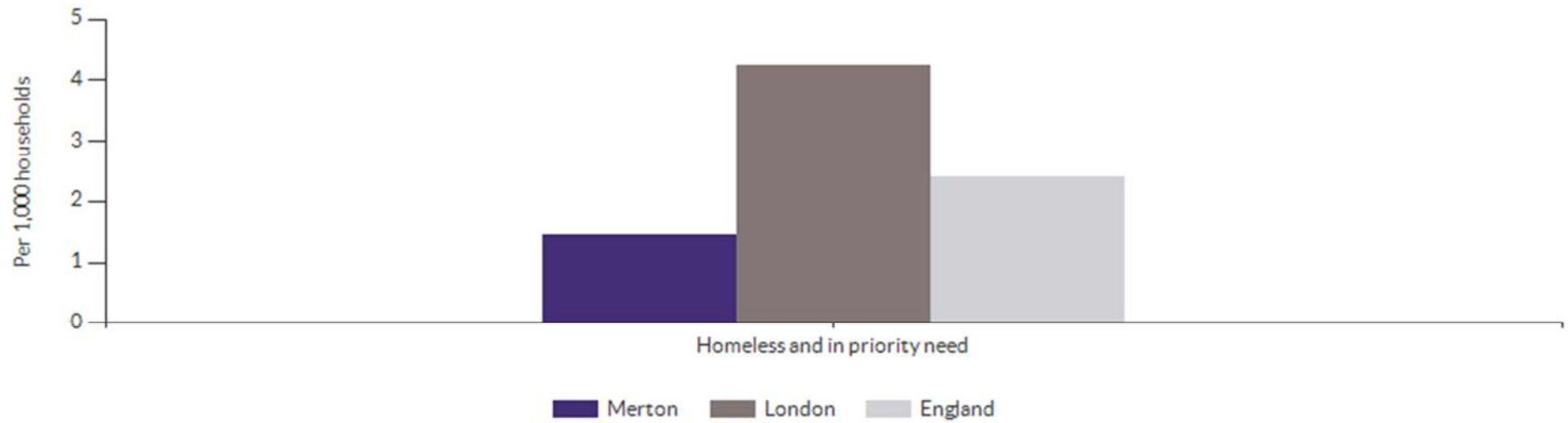
¹⁰ <https://data.merton.gov.uk/housing/>

¹¹ <https://www.merton.gov.uk/assets/Documents/Draft%20Homelessness%20Strategy%20to%202025.pdf>

¹² <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest>

¹³ https://lginform.local.gov.uk/reports/lqastandard?mod-metric=12891&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup

Figure 54: Homeless in Merton

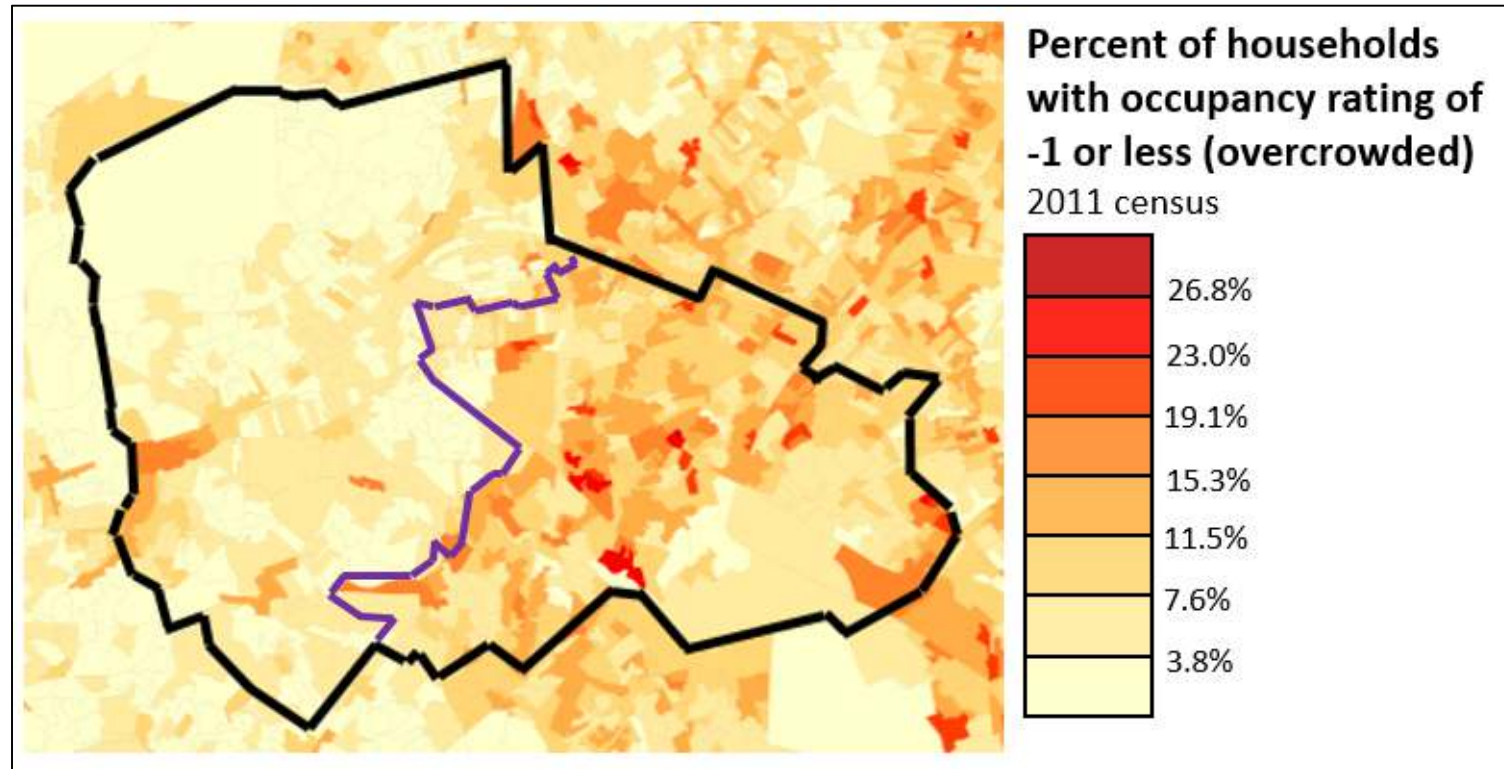


Date: 2017-2018 Source: MHCLG

Overcrowding

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

Figure 55: Overcrowding in Merton



22.52 Multigenerational households are those where an adult aged 65 years or older co-resides with at least another person who is more than 20 years younger, or with a child¹⁴. Multigenerational households have been associated with higher COVID transmission, especially due to the risk to older relatives¹⁵. Although data is not currently available at the Merton level, it is likely there are more multigenerational households in east of the borough, neighbourhood of Mitcham, Morden and Colliers Wood.

¹⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943178/S0923_housing_household_transmission_and_ethnicity.pdf

¹⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2019#multi-family-households-are-the-fastest-growing-household-type-in-the-uk-but-currently-represent-the-smallest-share-of-households>

Figure 56: Other Households (Multiple person non-student households and student households) in Merton 2011

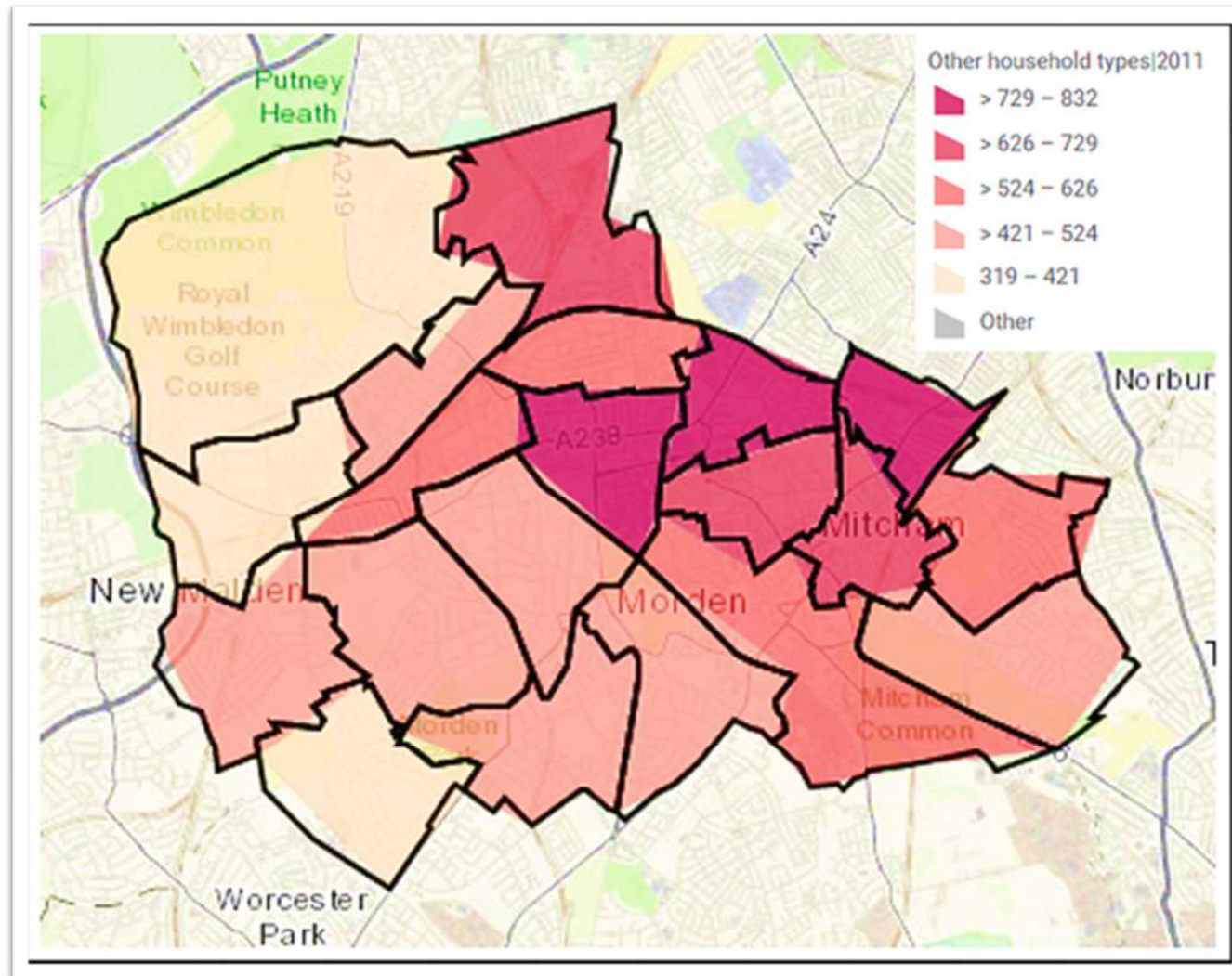
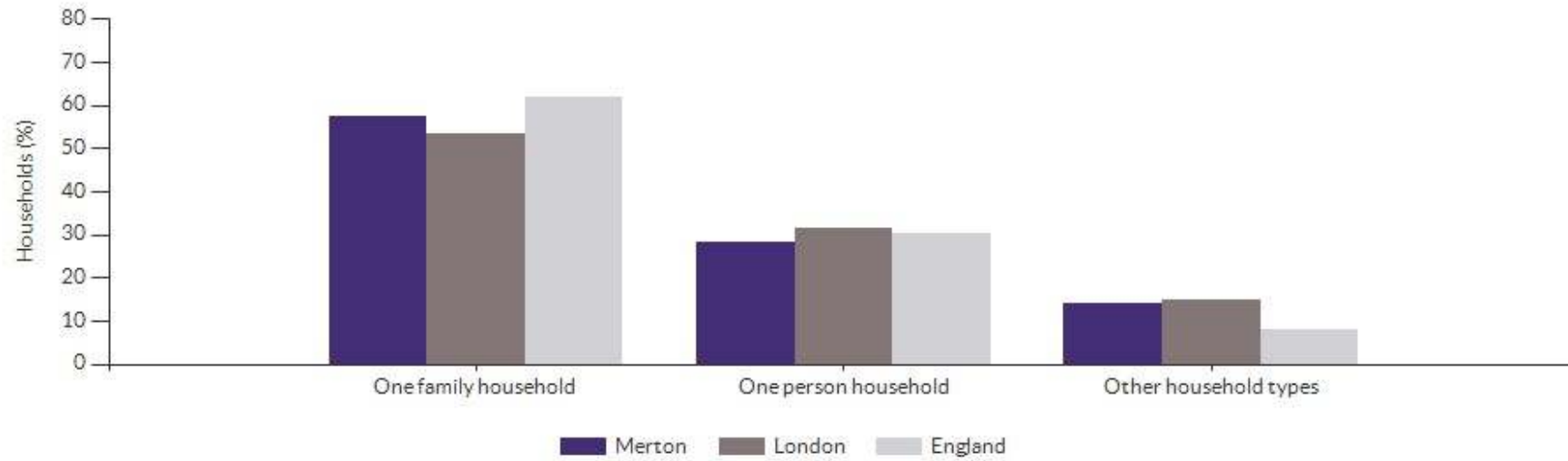
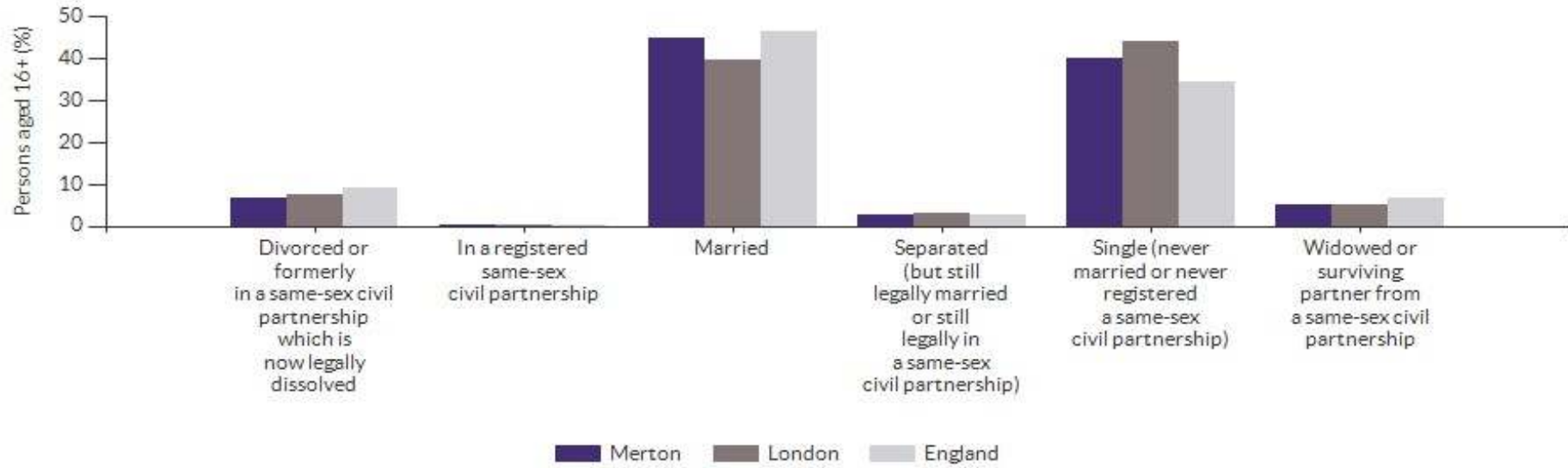


Figure 57: Household composition breakdown



Source: ONS Census 2011

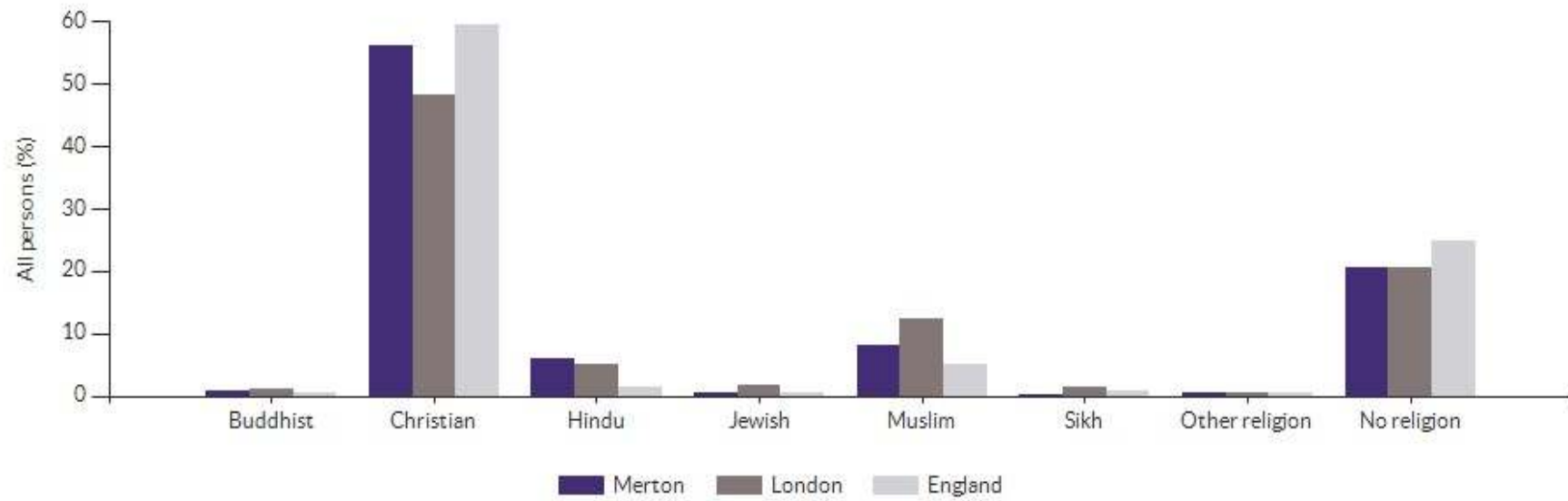
Figure 58: Marital and civil partnership status breakdown



Source: ONS Census 2011

Figure 59: Religion and beliefs in Merton

Religion breakdown

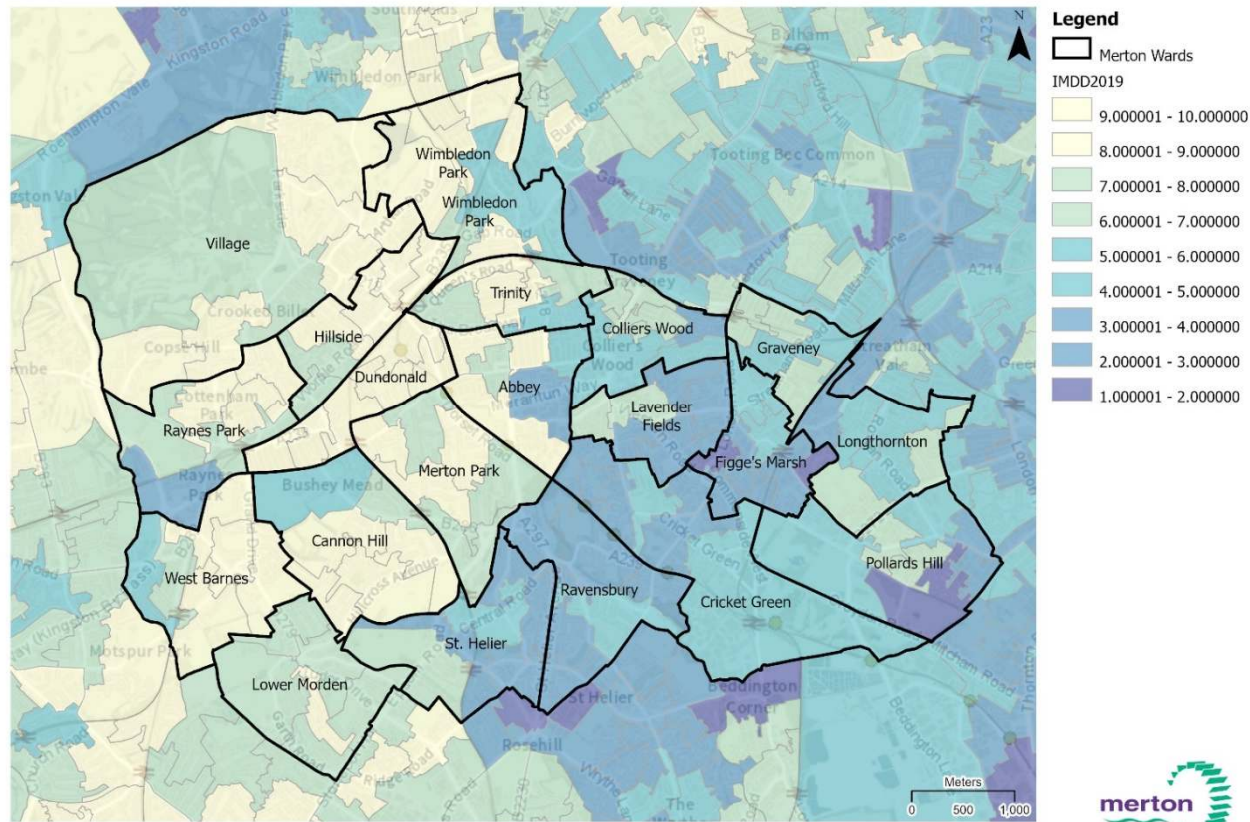


Source: ONS Census 2011

Index of Multiple Deprivation

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

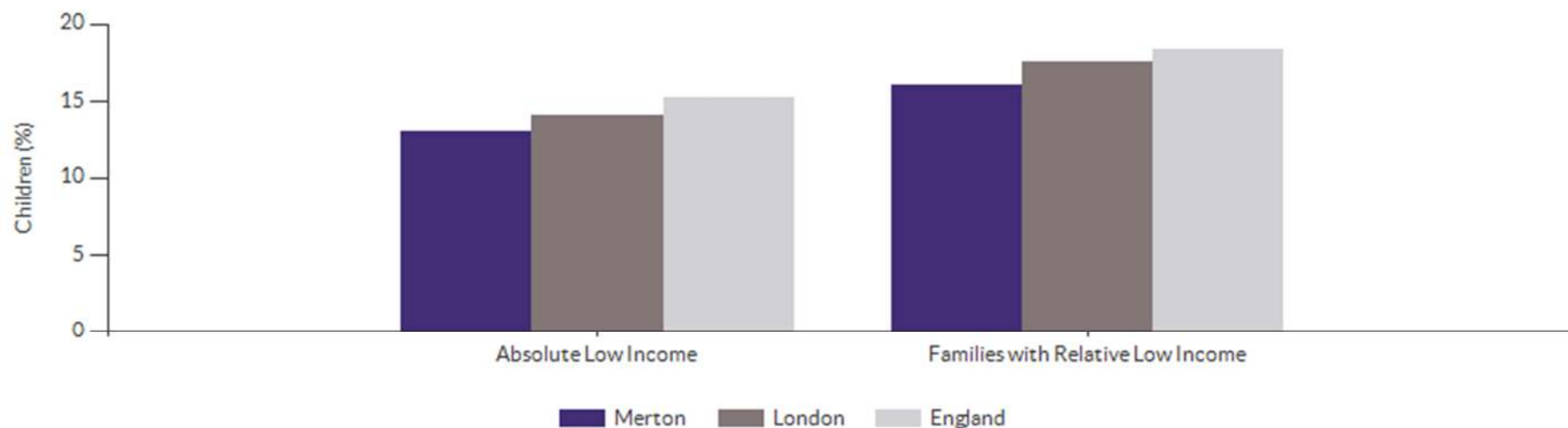
Figure 60: Indices of deprivation in Merton by wards (darker the area – higher deprivation).



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

Figure 61: Children in low-income families

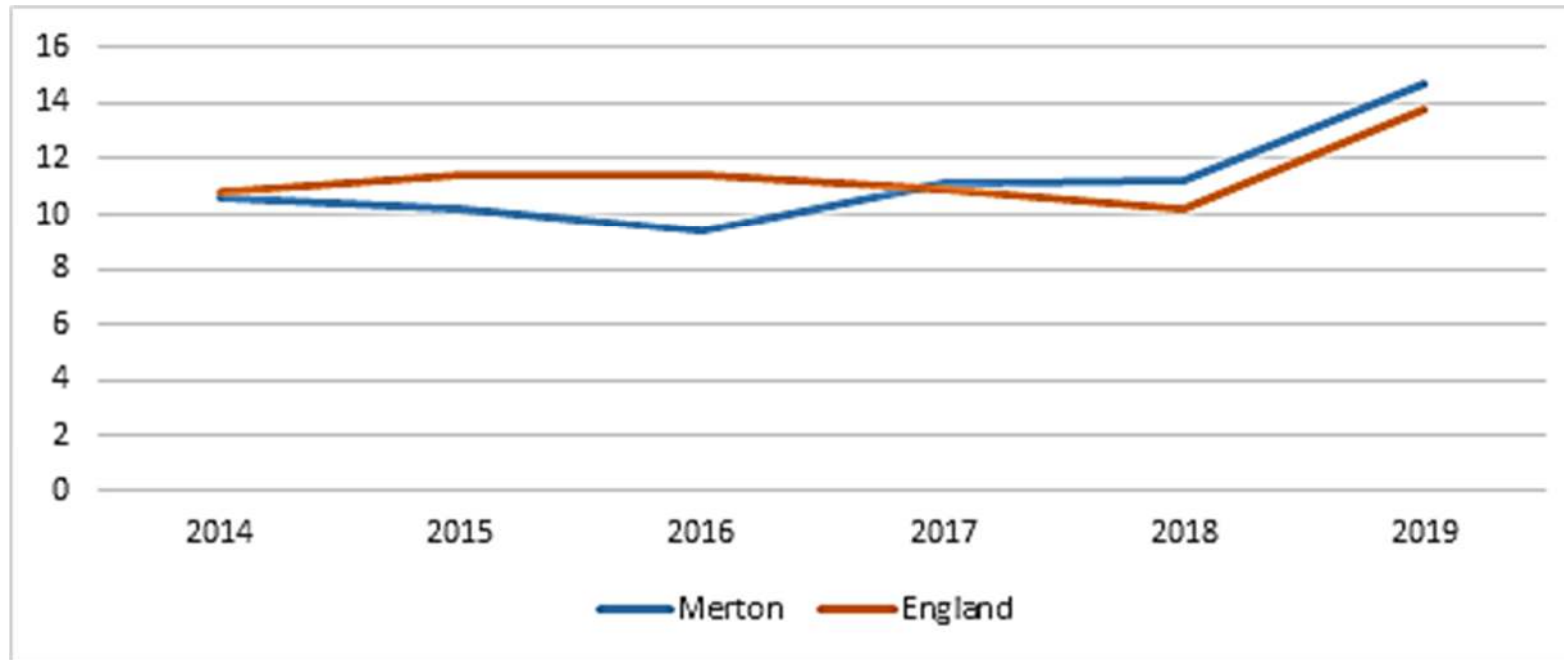


Date: 2018-2019 Source: DWP/ONS

Fuel Poverty and excess winter mortality

22.56 Low income combined with high-energy costs is, linked to homes that are not, heated sufficiently. A household is *fuel poor* if the fuel costs of the household are above average (the national median level) and, were they to spend that amount, the residual income would drop below the poverty line. Fuel poverty is more prevalent in inner London boroughs and lessens in outer London. 14.7% of households in Merton were in Fuel Poverty as of 2019, similar to both London and England (table 6.5). However, this has increased since 2015 from 10.2%, and similar trends have been, seen nationally¹⁶.

Figure 62: percentage of household in fuel poverty¹⁷

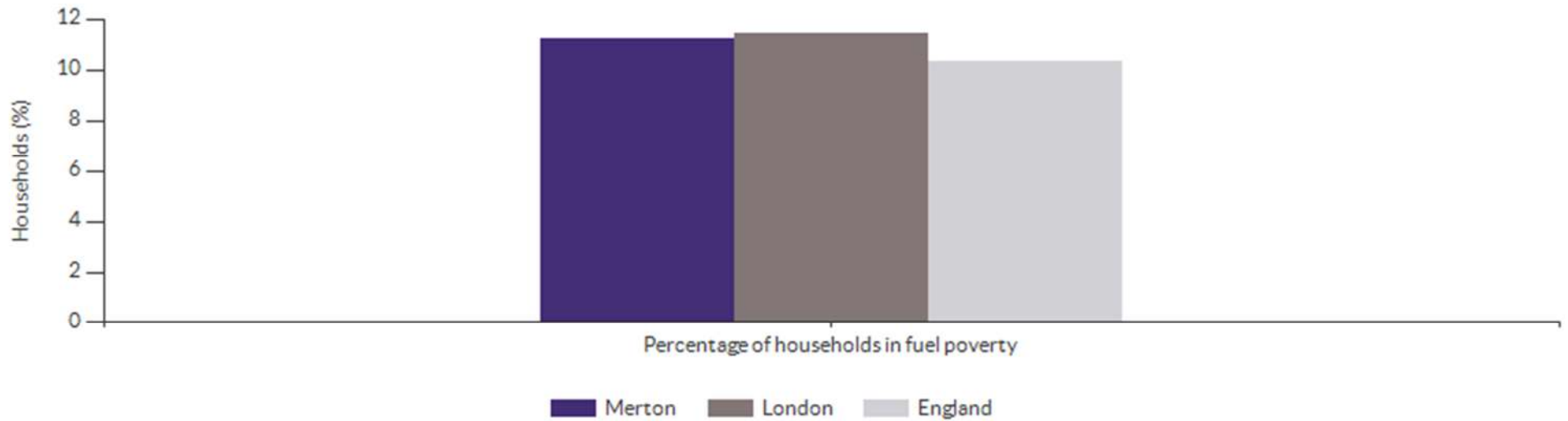


¹⁶ https://lginform.local.gov.uk/reports/lgastandard?mod-area=E09000024&mod-group=AllRegions_England&mod-metric=2131&mod-type=namedComparisonGroup

¹⁷ https://lginform.local.gov.uk/reports/lgastandard?mod-metric=2131&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup

22.57 Fuel poverty is often a greater concern for elderly populations. Merton has a high level of people aged over 65 receiving winter fuel payments (95.3%) and low levels of older people living in deprivation (16.1%). Levels of deprivation for older people are considerably lower in Merton compared to the London average¹⁸.

Figure 63: household in fuel poverty

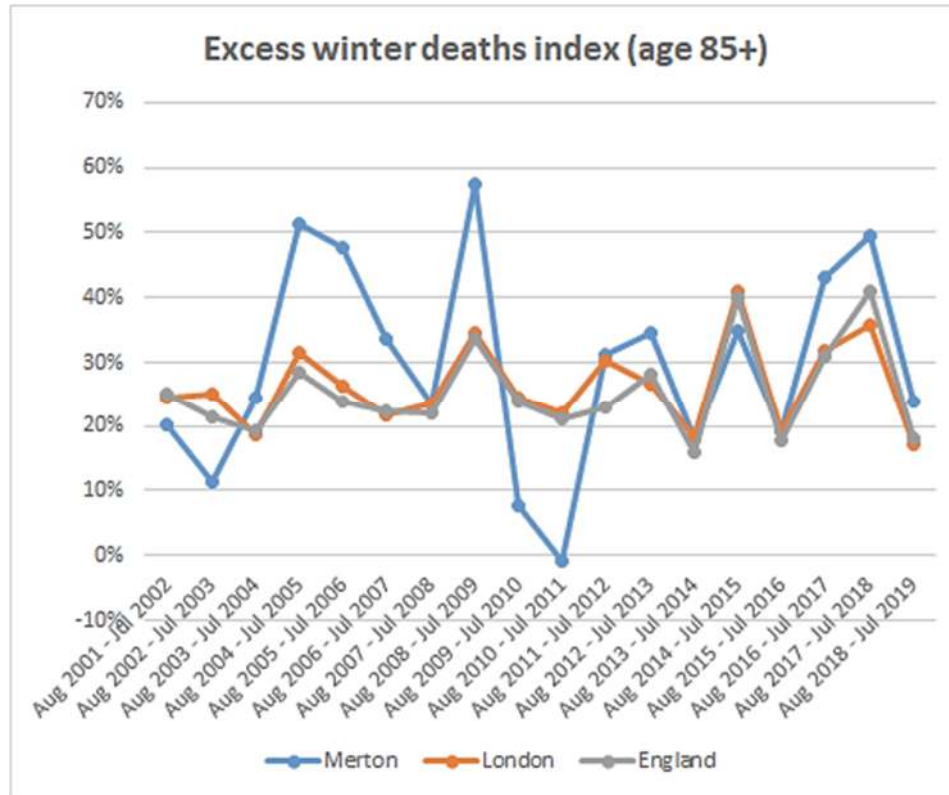


Date: 2018 Source: BEIS

¹⁸ https://qinform.local.gov.uk/reports/qastandard?mod-metric=381&mod-area=E09000024&mod-group=AllBoroughInRegion_London&mod-type=namedComparisonGroup

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

Figure 64³: Excess Winter Deaths Index (EWD Index)



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

**EWD is the excess winter deaths measured as the ratio of extra deaths from all causes that occur in all those aged 85 and over in the winter months compared with the expected number of deaths, based on the average of the number of non-winter deaths in those aged 85 and over¹⁹.

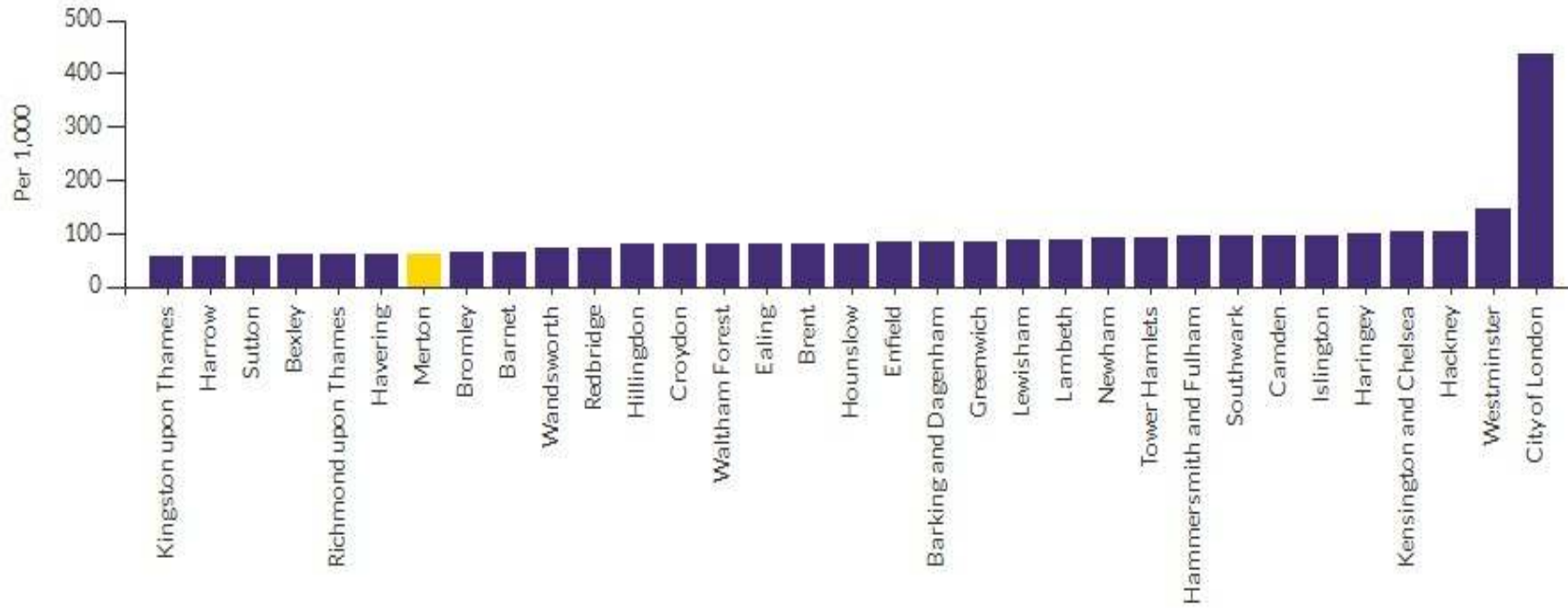
¹⁹ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/methodologies/mortalitystatisticsinenglandandwalesqmi>

Crime

- 22.59 The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing. Overall Merton is a safe borough with a crime rate below both the London and England average. Merton compares well to both the London and England average on a range of indicators including children in the youth justice system, first time entrants to the youth justice system, violent sexual crimes and 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 before rising again through the summer and falling again during the winter lockdown. Crime has now returned to pre-pandemic levels.
- 22.60 According to the 2019 Residents Survey, most residents living in the borough feel safe in their local area, both during the day (98%) and at night (84%). Merton compares well against the national figures collected by the LGA (Local Government Association) in October 2018 when 76% of residents felt safe after dark and 93% felt secure during the day.
- 22.61 Feelings of daytime safety are consistent across the key demographics, however as night approaches certain residents become more concerned about their safety:
- Residents of East Merton and Mitcham, 75% feel safe after dark
 - Those living in North East Merton, 76% feel safe after dark
 - Women, 78% feel safe after dark
 - Those aged 65 or over, 73% feel safe after dark
 - Disabled residents, 74% feel safe after dark
 - Those economically inactive, 75% feel safe after dark
- 22.62 Certain groups in Merton are over-represented in crime statistics compared to the London average. Under 18s make up 27% of sexual offence victims although they only make 23% of Merton's population. Similarly, the black population in Merton are over-represented as victims of sexual offences (17%) and domestic violence (15%).²⁰

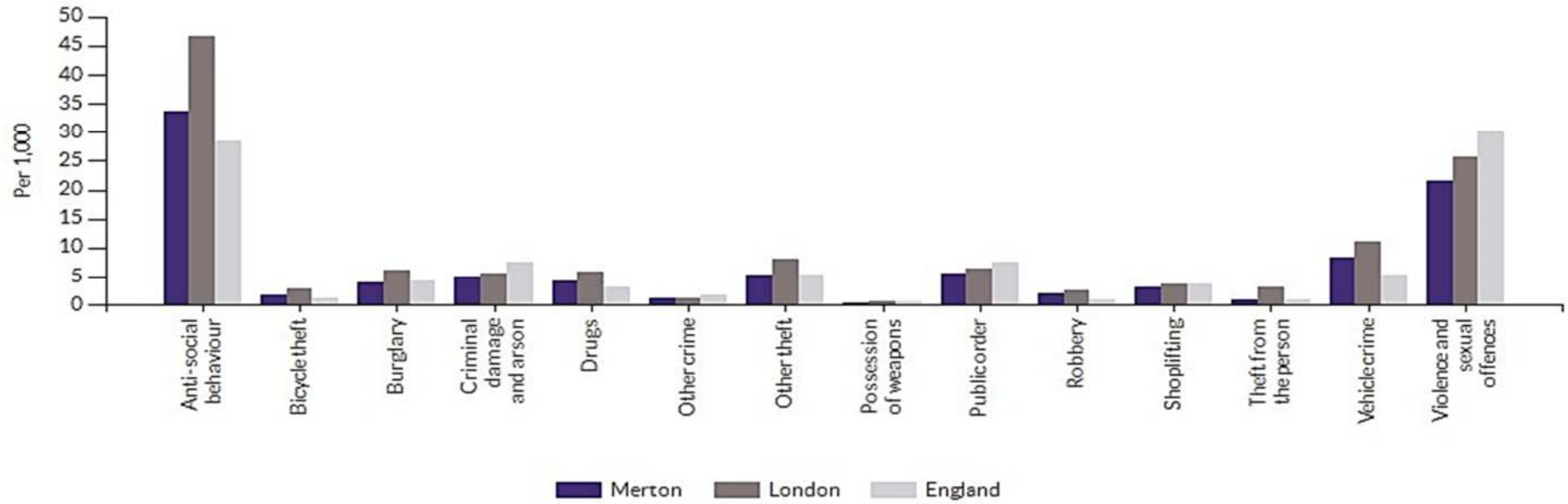
²⁰ https://www.london.gov.uk/sites/default/files/annex_1_-_evidence_pack.pdf

Figure 65: Overall crime rate by offences



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

Figure 66: Crime rate by type of crime



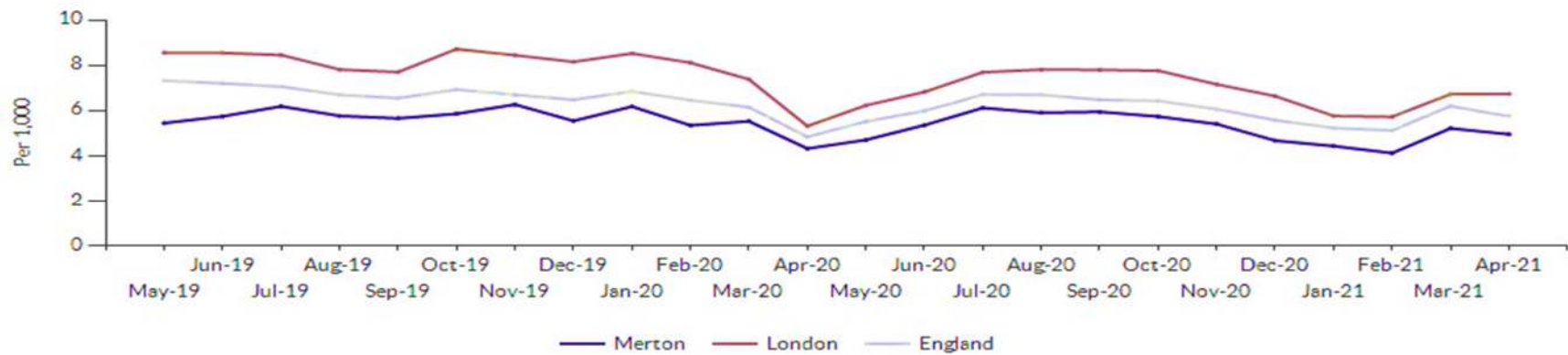
Date: May-20 - Apr-21 Source: data.police.uk

Figure 67: Crime by type of offences (count and percentage)

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

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

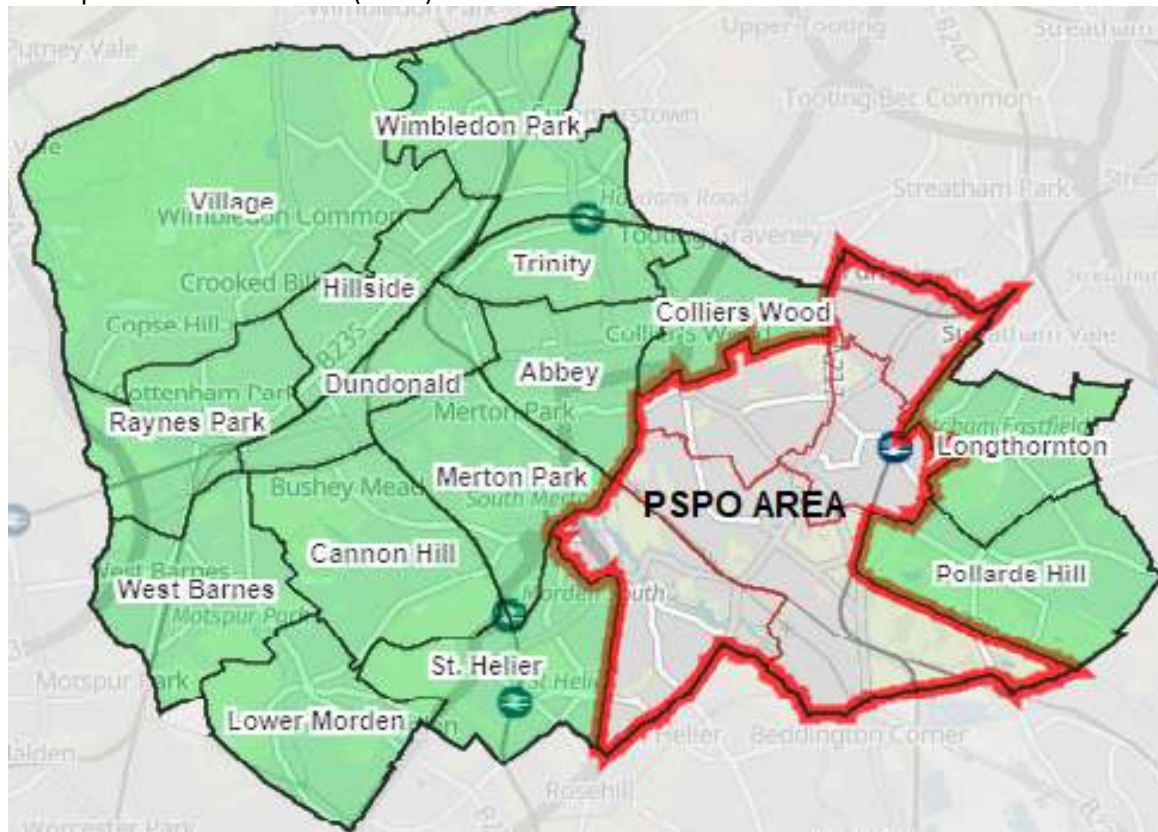
Figure 68: Overall crime rate change



Source: data.police.uk

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

Figure 69: Public Space Protection Order (PSPO) Areas in Merton

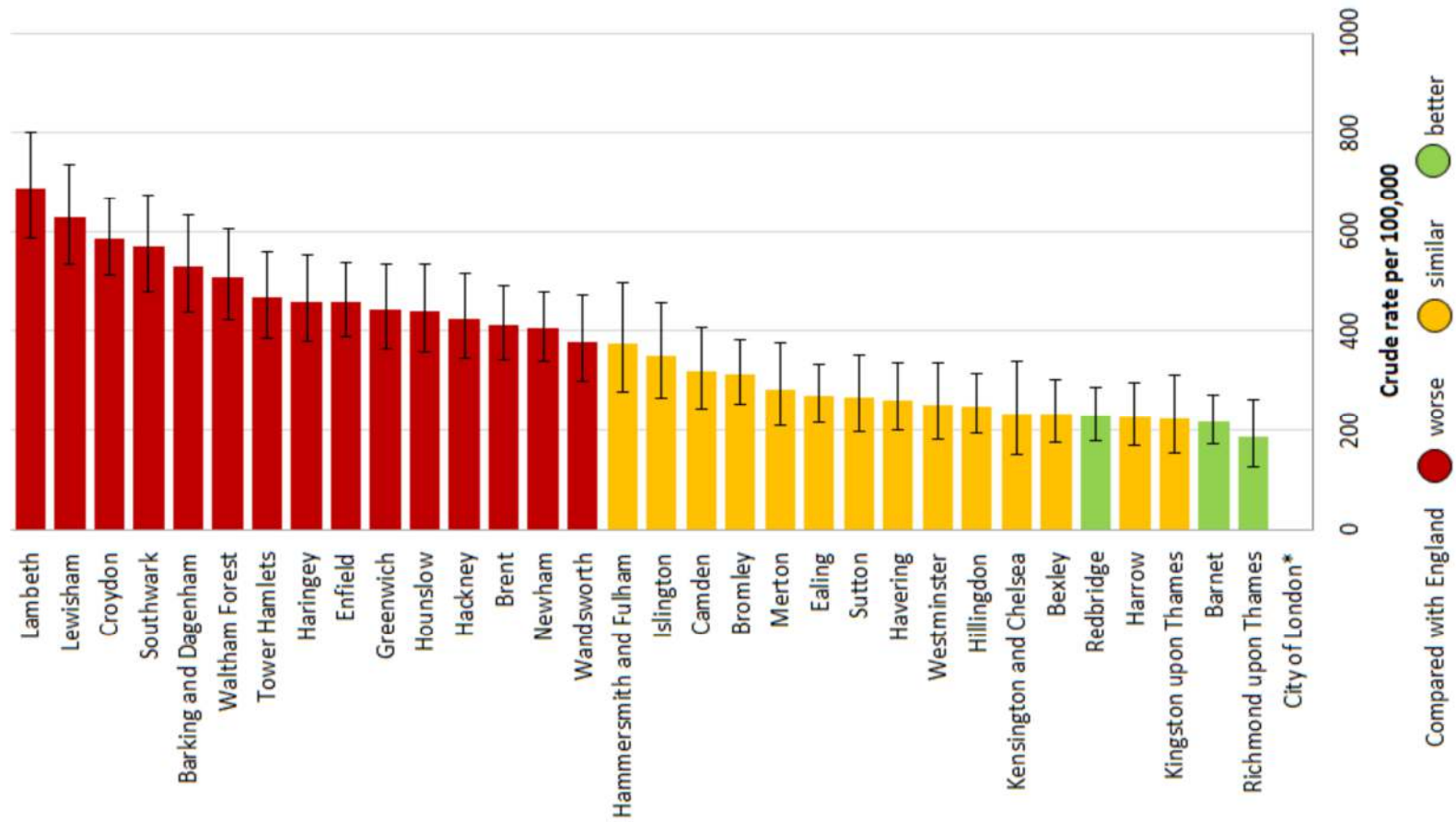


First time entrants to the youth justice system

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

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

Figure 70: First time entrants to the youth justice system by borough



* Not calculated due to small numbers

Transport infrastructure

Railway

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

Underground (tube) and tram

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

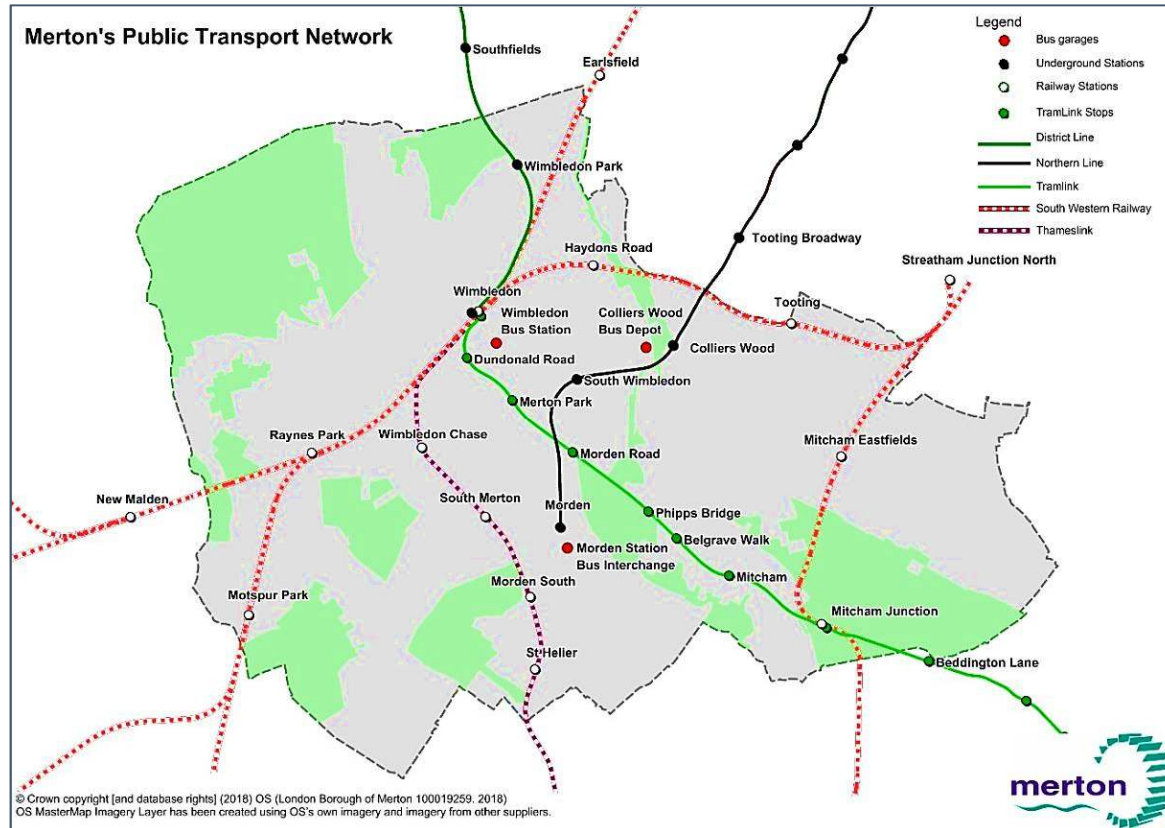
Bus

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

Public Transport Accessibility Levels (PTAL)

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

Figure 71: Merton Public transport network



Road network

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

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

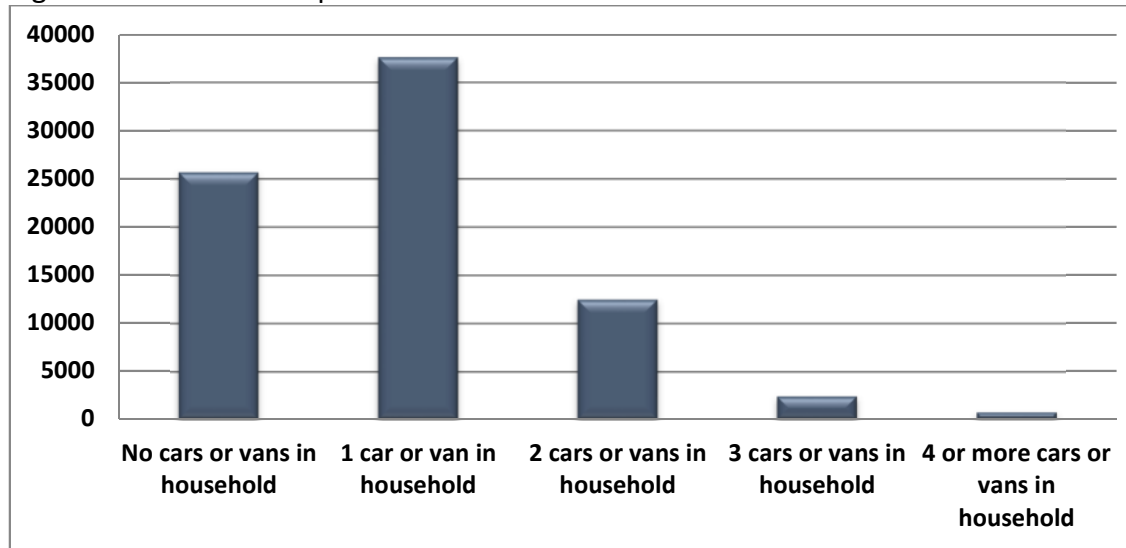
Transport use patterns

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

Car ownership

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

Figure 72: Car ownership in Merton

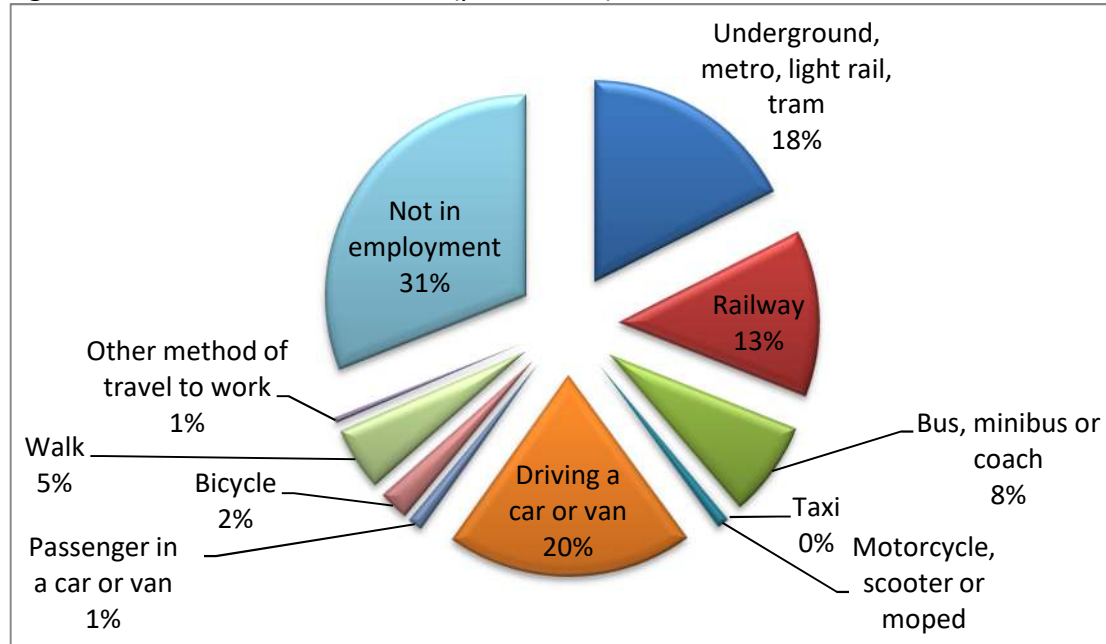


Source 2011 Census

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

Travel to work

Figure 73: Mode of travel to work (pre- COVID)

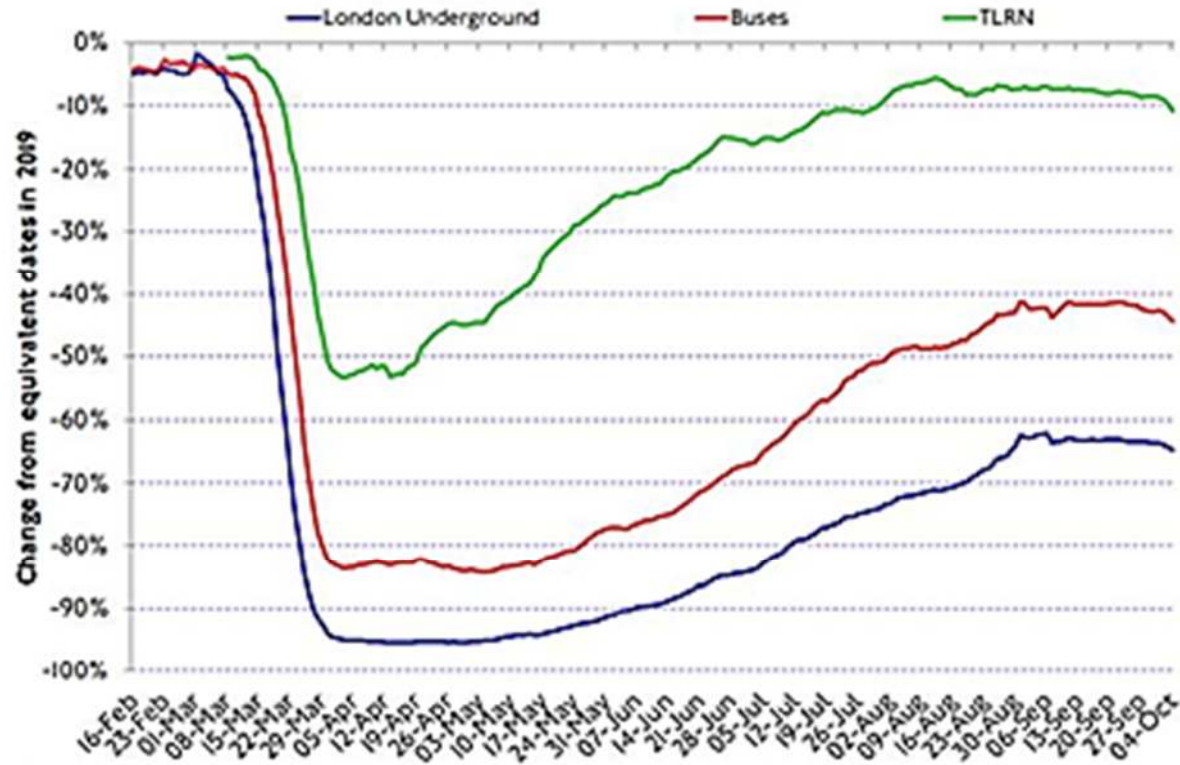


Source: Census 2011

Road safety

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

Figure 74: Demand on London Underground, Buses and Transport for London Road Networks (TLRN) in London, 7-day moving average, 2020 vs 2019

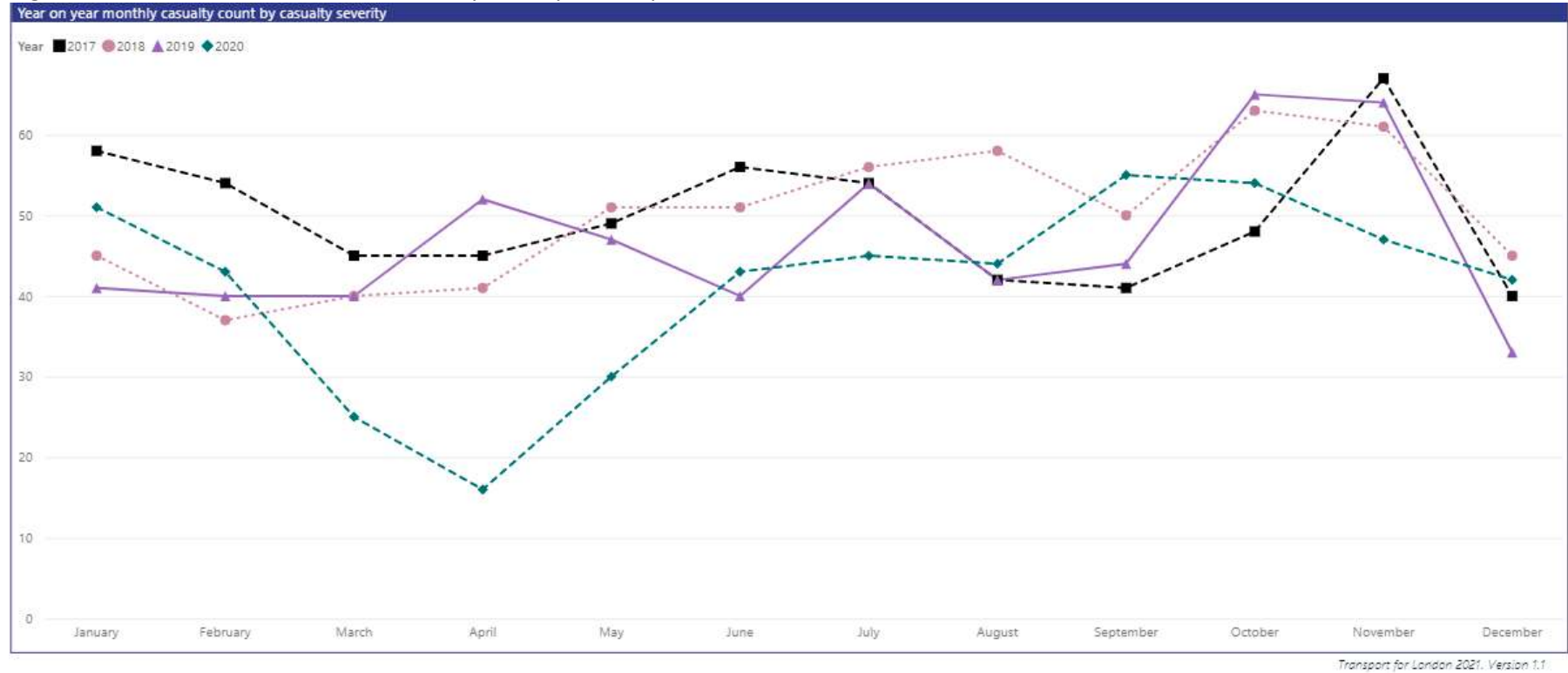


Source: TfL Technology & Data, TfL Surface Transport.

Note: No bus data available 20 Apr-28 Jun due to changes to ticket validation. The values provided are estimates.

22.78 In 2020, there were 495 total traffic collisions in Merton compared to 562 in 2019. The number of traffic collisions fell sharply during the first lockdown before gradually rising through the summer and autumn. Collisions had returned to pre-pandemic levels by December 2021.

Figure 75: Total traffic casualties in Merton, year on year comparison²²



²¹<https://app.powerbi.com/view?r=eyJrJoiYTIkYmE1ZGQ0NGlyZi00N2YyLWVlWEVMTYtMIYzNzA5YTVkOWEzIiwidCI6IjFmYmQ2NWJmLTVkZWYtNGVlYS1hNjkyLWVlODIjMjU1MzQ2YiIsImMiOiIh9>

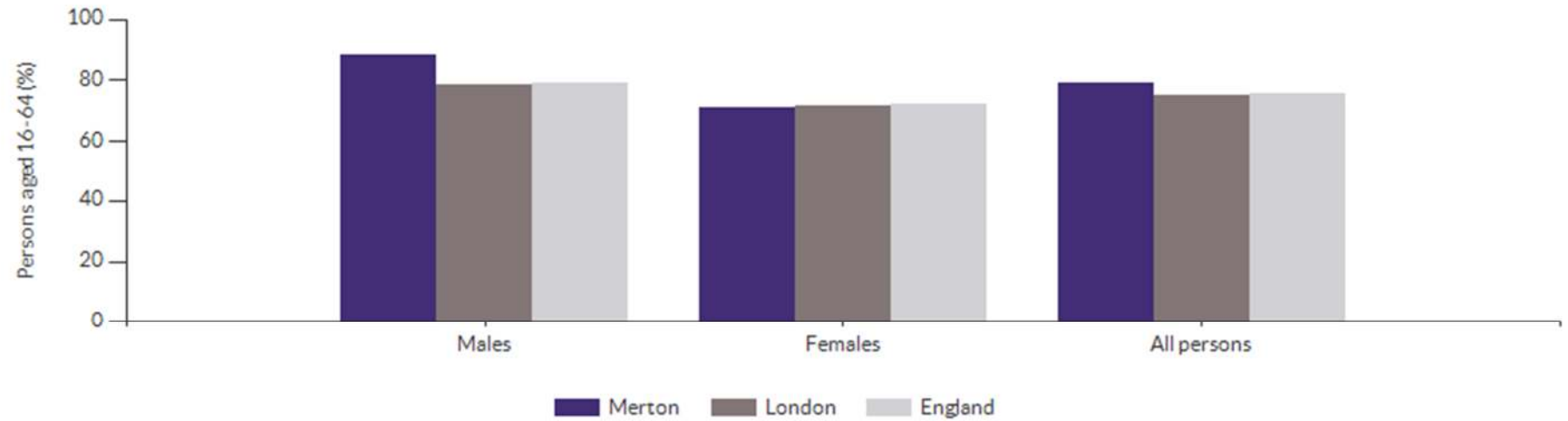
²²<https://app.powerbi.com/view?r=eyJrJoiYTIkYmE1ZGQ0NGlyZi00N2YyLWVlWEVMTYtMIYzNzA5YTVkOWEzIiwidCI6IjFmYmQ2NWJmLTVkZWYtNGVlYS1hNjkyLWVlODIjMjU1MzQ2YiIsImMiOiIh9>

Economic baseline data

Employment and income

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

Figure 76: Employment rate in Merton



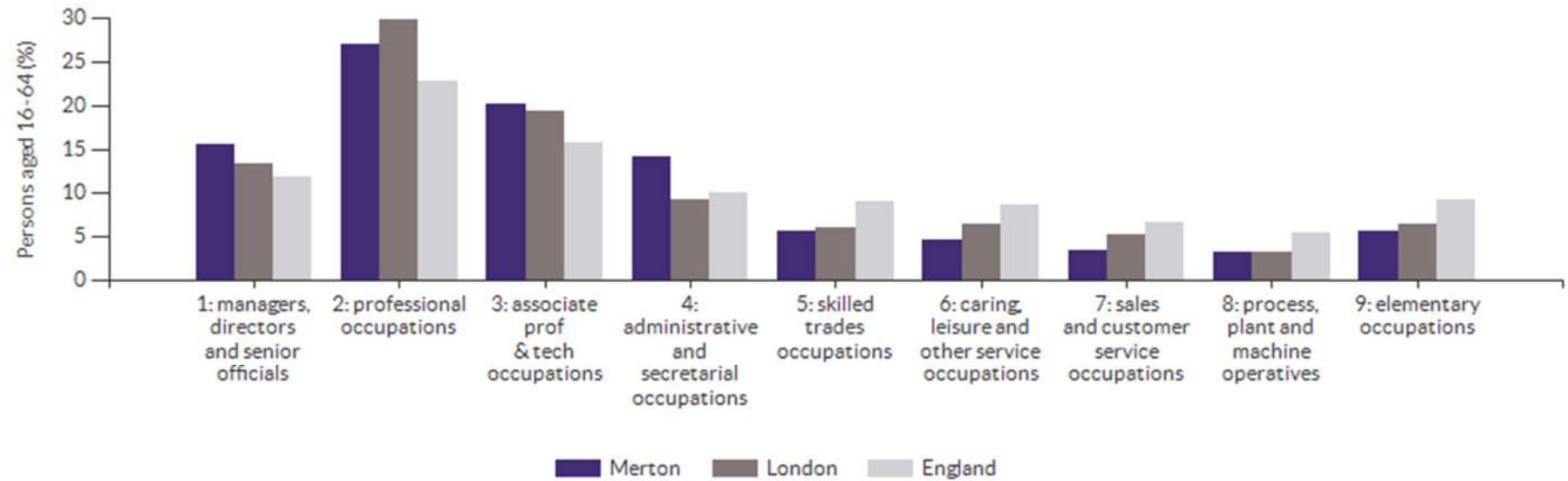
Date: 2020-12 Source: ONSAPS

22.82

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

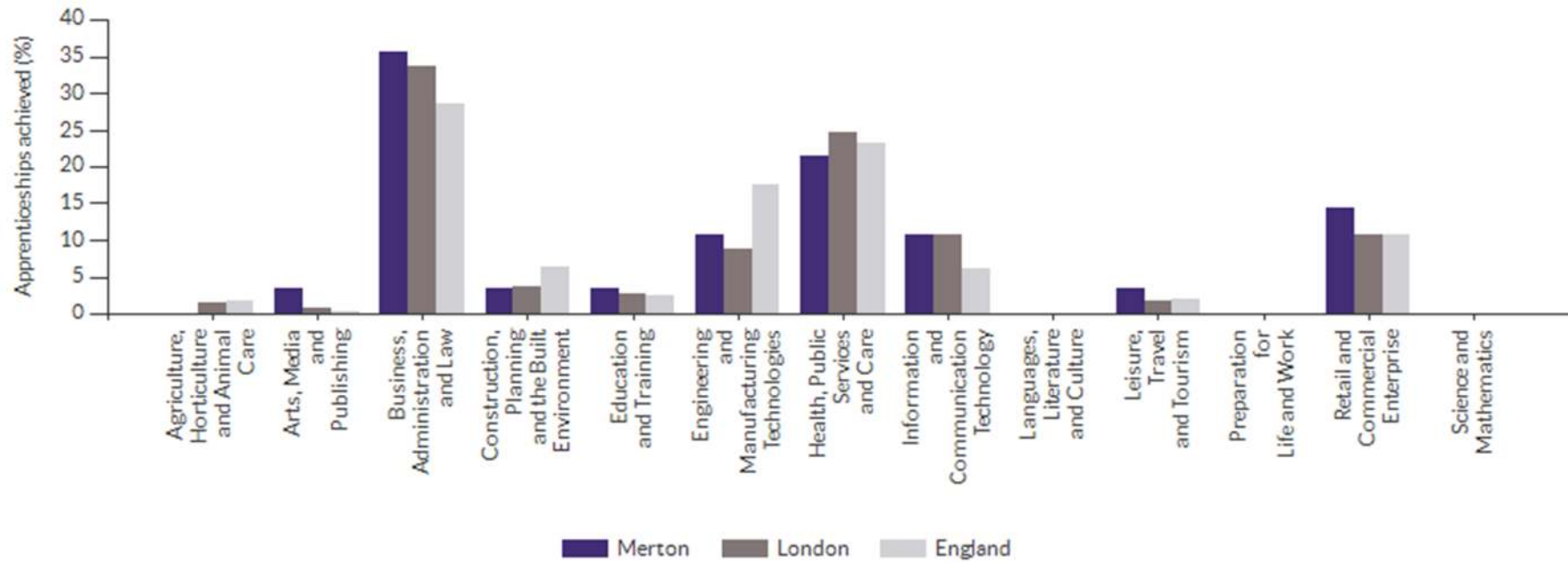
- 16% Admin and service support
- 15% managers, directors and senior officials
- 27% Professional, scientific and technical activities

Figure 77: employment sectors in Merton



Date: 2020-12 Source: ONSAPS

Figures 78: Apprenticeships in Merton



Date: 2019-2020 Source: DfE

Figure 79: Work patterns



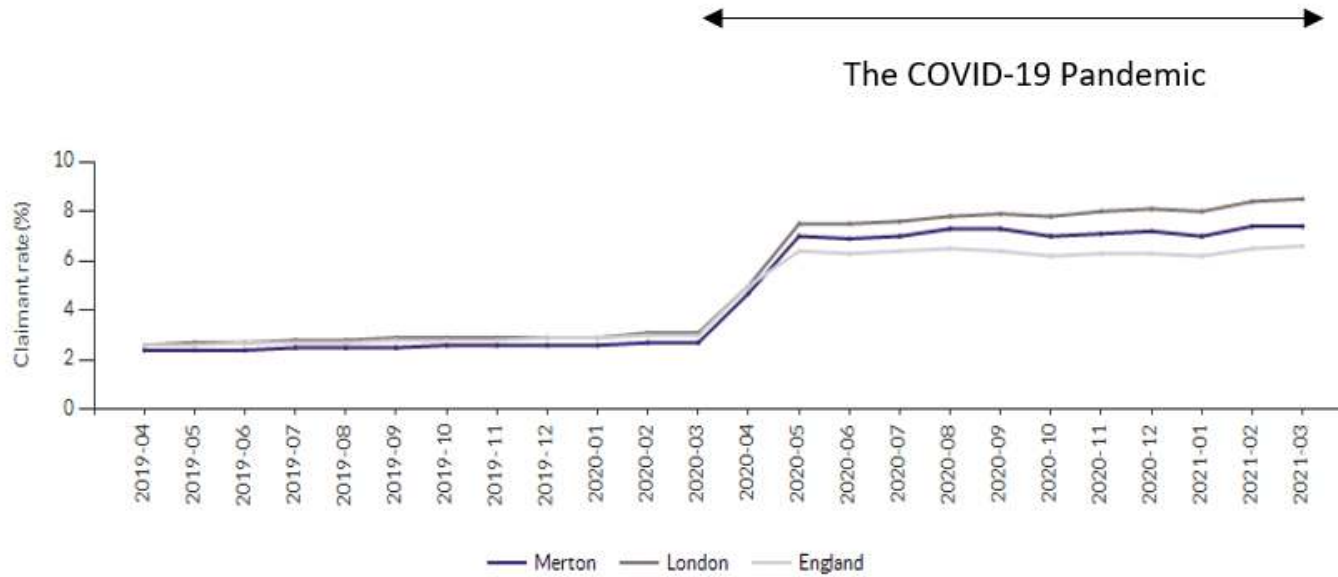
Date: 2020 Source: ONSASHE

- 22.83 The Annual Survey of Hours and Earnings (ASHE) is conducted in April each year to obtain information about the levels, distribution and make-up of earnings and hours worked for employees. This data set provides information about earnings of employees who are living in an area, who are on adult rates and whose pay for the survey pay-period was not affected by absence. ASHE is based on a sample of employee jobs taken from HM Revenue & Customs PAYE records. Information on earnings and hours is obtained in confidence from employers. ASHE does not cover the self-employed nor does it cover employees not paid during the reference period
- 22.84 Unemployment in Merton as of December 2020 stood at 6.2%, higher than the London (6%) and England (4.8%) averages (Table 6.3). This is an increase from 5.8% from April 2020 at the onset of the pandemic²³. The pandemic has also changed the amount of people claiming either job seekers allowance or universal credit in Merton. Figure 6.10 shows the rise in the total claimant rate (those claiming either job seekers allowance or universal credit) in Merton rising from 2.7% in March 2020 to 7.4% in March 2021.

²³ https://www.nomisweb.co.uk/reports/lmp/la/1946157274/subreports/ea_time_series/report.aspx?

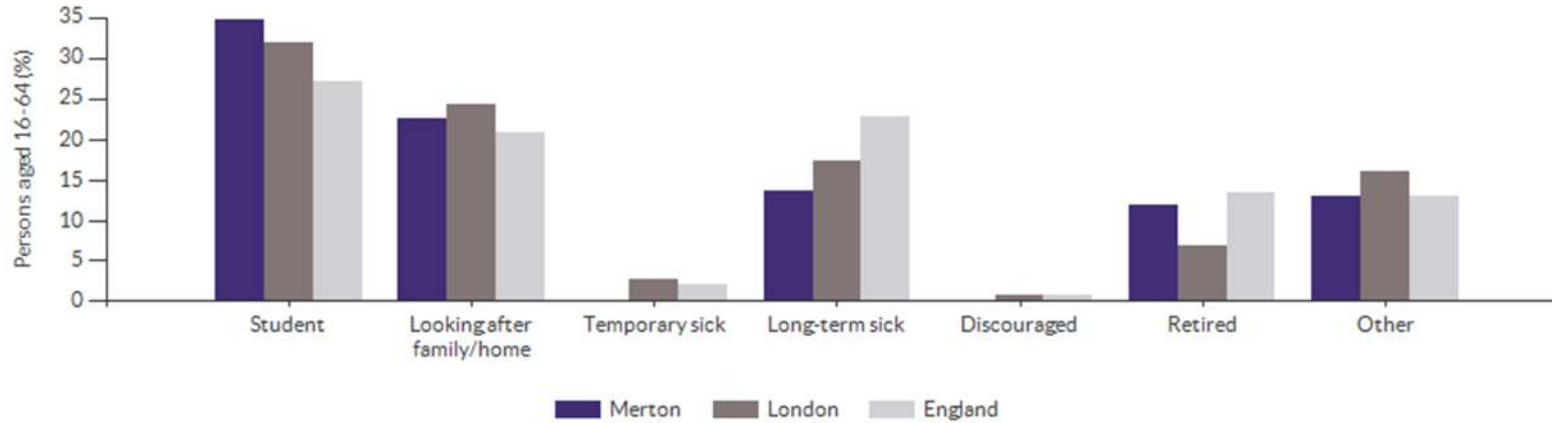
The rise in the claimant rate has been highest in the east of the borough with Figges Marsh, Pollards Hill and Cricket Green wards having a claimant rate of approximately 12% compared to 2.7% in Wimbledon Village

Figure 80: Claimant rate percentage in Merton, London and England



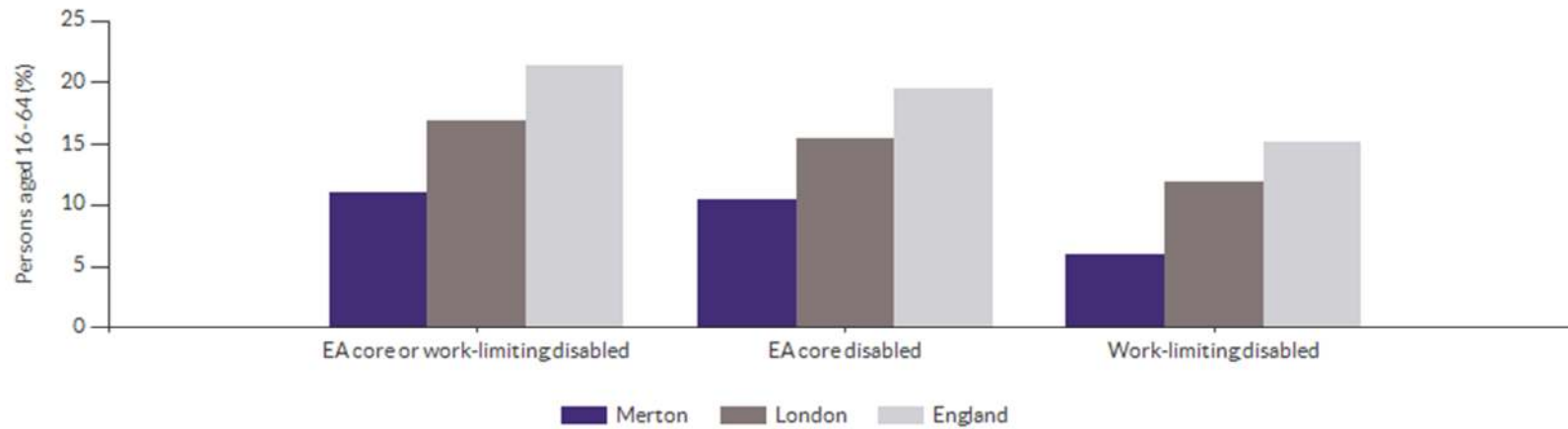
Source: ONS

Figure 81: Economic inactivity by reason



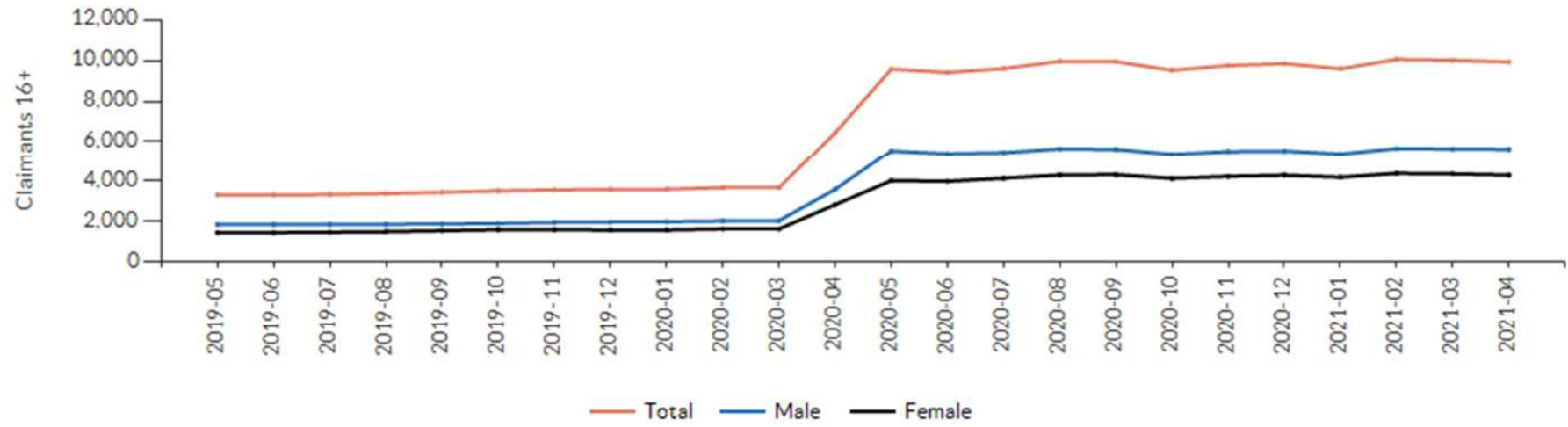
Date: 2020-12 Source: ONSAPS

Figure 82: Disability (Equality Act) core level



Date: 2020-12 Source: ONSAPS

Figure 83: Monthly claimant counts



Source: ONS

Appendix B: site allocation 'reasonable alternatives'

Topic	Reasonable alternatives
<u>Urban objectives</u>	<p><u>The five objectives in the Local Plan were subject to public consultation in Stage 2, 2a and published in 3. The objectives developed by identifying the issues in the borough as set out in the SA scoping report in 2017 and 2018.</u></p> <p><u>The draft Local Plan including the objectives and the SA scoping report were subject to public consultation at Stage 2 (2018-19). Developed further and reordered because of public consultation feedback on the Local Plan and the SA at stage 2a (2020-21).</u></p> <p><u>Based on the wealth of evidence and the public consultation feedback on the Local Plan and the SA between 2018 and 2021 it is not considered that there are reasonable alternatives to the five objectives. Together the five Urban Objectives promote sustainable development by integrating social, economic, and environmental considerations into the preparation of the Local Plan.</u></p>
<u>Colliers Wood neighbour policy and site allocations</u>	
<u>N3.1 Colliers Wood policy</u>	<p><u>Colliers Wood policy is in essence a continuation of the policy direction of Merton's Core Planning Strategy (2011) and Sustainability Appraisal 2008- 2011 to support development that creates a District Centre feel from out of centre retail sheds, introduces new uses such as residential and smaller shop units and improves walking and cycling access around the town centre.</u></p> <p><u>Public consultations feedback and evidence supports the policy direction and there is no reasonable alternative. The policy promotes sustainable development by integrating social, economic, and environmental considerations.</u></p>
<u>CW.1Baltic Close.</u>	<u>Small site – no reasonable alternative to the site allocation use.</u>
<u>CW.2 Britannia Point car park</u>	<p><u>The reasonable alternative considered as part of the SA/SEA process and stage 2a public consultation. The reasonable alternative consider related to building heights of this town centre site. Following public consultation feedback, the reasonable alternative was, rejected by the Council. This does affect the findings of the SA/SEA or require further assessment.</u></p>
<u>CW.3 Colliers Wood community centre</u>	<p><u>Small site and already considered in the Sites and Policies Plan 2014; allows for the retention of community services. The Council believes there are no reasonable alternative to developing the site other than no development, which is not an option.</u></p>

<u>CW.4 Colliers Wood station</u>	<u>No reasonable alternative - allocation supports a wide range uses including residential, suitable for a town centre and OA. Site allocations within an OA are expected to contribute positively to its environmental, social and economic growth, in accordance with the London Plan. The SA/SEA supports the allocation and it uses.</u>
<u>CW.5 Priory Retail Park</u>	<u>No reasonable alternative – allocation supports a wide range of uses suitable for a town centre and OA including, residential on upper floors plus landscaping and public realm improvements, having regard to the historical context. The SA/SEA supports the allocation and uses.</u>
Mitcham neighbour policy and site allocations	
<u>N3.2 Mitcham policy</u>	<p><u>The policy for Mitcham town centre focusses on improving the economic vitality of the town centre, by supporting redevelopment that provides homes above shops within the town centre, improves the public realm, walking and cycling within and to the town centre. The policy development is informed by evidence and public consultation feedback.</u></p> <p><u>Evidence does not support substantially increasing offices and retail space within this District Centre – this was not considered a reasonable alternative was considered by the Council.</u></p> <p><u>Consultation feedback and the Stage 3 policy support enhancing the public realm and streetscape as well as access to local amenities such as Mitcham Common and The Canons.</u></p>
<u>Mi1 Benedict Wharf</u>	<u>As an allocated waste management site and Strategic Industrial Location in the current Local Plans, Benedict’s Wharf did not first appear as a site suitable for alternative uses. However, longstanding feedback from neighbours about the problems of an operational waste management single-entrance site in this location. The restrictions placed on the site that prevented it realising its active planning permissions fully for waste management uses and the opportunity to retain the waste management capacity within the South London Waste Plan area aligned to support its release for housing through this local plan and the South London Waste Plan 2022. This sustainability appraisal does consider reasonable alternatives relating to specific details of the planning application 19/P2383 which was resolved to be granted in December 2020.</u>
<u>Mi2: Birches Close, Mitcham.</u>	<u>Site previously allocated in the Sites and Policies Plan 2014 and associated sustainability appraisal process. Site use allows for the retention of health and community services in the area and new homes. The alternative has not been taken forward by the council is to deliver this site in the absence of maintained healthcare capacity locally at the Wilson Hospital.</u>

<u>Mi3: Burn Bullock and Mitcham Cricket Pavilion 315 London Road, Mitcham</u>	<u>The alternative that would allow the redevelopment of the cricket pavilion and storage area that exists on this site is not considered reasonable as would prevent the successful and continued operation of cricket playing on Mitcham Cricket Green. The alternative option of supporting residential development on the ground floor of the Burn Bullock is not taken forward due to the proximity of the A24 and Cricket Green Road to the ground floor frontage. The allocation supports the restoration of the Burn Bullock, which promotes sustainable development by integrating social, economic, and environmental considerations.</u>
<u>Mi4: Elm Nursery Car Park 210 London Road, Mitcham,</u>	<u>Site previously allocated in Site allocation Plan 2014 and supporting SA/SEA and associated sustainability appraisal process. Therefore, there are no reasonable alternative other than no allocation. Planning permission (19/P4047) resolved to be granted in 2020</u>
<u>Mi5: Land at Canons Madeira Road, Mitcham,</u>	<u>Small site allocated for residential development – no reasonable alternative other than no allocation. Planning permission (19/P4050) resolved to be granted in 2020</u>
<u>Mi6: 326 and 328 London Road, Mitcham CR4</u>	<u>Small site allocated for residential development and retention of the services locally. Alternative to keep site for community uses not supported due to presence of alternative community uses at other sites in Cricket Green</u>
<u>Mi7: 370 London Road Mitcham</u>	<u>Small site allocated for mixed use on ground floor and residential on upper floors. No reasonable alternative due to site size, location near other developments and need for new homes.</u>
<u>Mi8: 1 to 12 Majestic Way, Mitcham</u>	<u>Allocation supports uses compatible uses for a town centre on the ground floor with frontages onto Mitcham town centre and residential on upper floors – allows for a very wide range of uses compatible with a town centre. This allocation supports the need for new homes. Therefore, no reasonable alternative is suitable or necessary.</u>
<u>Mi9: Former Mitcham Fire Station 30 Lower Green West</u>	<u>Small site. Site allocated in the Sites and Policies Plan 2014 and associated sustainability appraisal process for a range of uses– no reasonable alternative other than no allocation. Planning application 20/P2801 resolved to be granted permission in July 2021</u>
<u>Mi10: Mitcham Library, London Road</u>	<u>Small site. Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process. Site allocation contains reasonable alternatives for retention of library on site or within local area and range of community, office and residential uses.</u>
<u>Mi11: Raleigh Gardens car park, Raleigh Gardens, Mitcham</u>	<u>Small site allocated for residential development – allocating site for mix of uses not considered reasonable due to the site constraints and availability of existing premises in Merton. Planning permission (19/P4048) resolved and granted in 2020.</u>
<u>Mi12</u>	<u>Allocation supports uses compatible within a town centre on the ground floor with frontages onto</u>

	<u>Mitcham town centre and residential on upper floor. The allocation allows for a very wide range of uses compatible with a town centre and supports much needed new homes. No reasonable alternative considered.</u>
<u>Mi13: 30 St Mark's Road, Mitcham,</u>	<u>Very small site – no reasonable alternative.</u>
<u>Mi14: United Westminster Schools site, Tamworth Lane</u>	<u>Tamworth Lane – alternative to allocate the site for sports uses only not taken forward due to the evidence presented that the site was rented for community sports uses but found not to be viable. Engagement with sporting bodies undertaken through the Merton Playing Pitch Strategy (started in 2017, adopted in 2019) and the strategy recommends six months of investigation to explore whether a viable sporting organisation will deliver the site. The use of the site for solely sporting use by a viable sporting organisation is supported. However, no organisation came forward during this local plan process since 2017. Therefore the reasonable alternative of allocating the site only for sporting uses is not taken forward</u>
<u>Mi15 Taylor Road Day Centre, Wakefield Hall, Taylor Road,</u>	<u>Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process. Site allocation allows for retention of community uses and residential - no reasonable alternatives.</u>
<u>Mi16: Mitcham Gasworks Western Road</u>	<u>Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process. Allocation supports residential led mixed-use redevelopment – no reasonable alternatives presented through evidence</u>
<u>Mi17: White Hart Pub and back land London Road, Mitcham</u>	<u>Small site – allows for retention of existing uses and residential to help support White Hart restoration.</u>
<u>Mi18: Wilson Hospital Cranmer Road,</u>	<u>Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process; allows for the retention of health and community services in the area and new homes. The alternative that has not been taken forward by the council is to deliver this site in the absence of maintained healthcare capacity locally at the Wilson Hospital.</u>
<u>Mi19 Worsfold House Church Road,</u>	<u>Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process; allocation supported school uses, which has since been delivered through the expansion of Cricket Green School onto part of the site.</u>
<u>Morden neighbourhood policy and site allocations</u>	
<u>Morden policy N5.1</u>	<u>The policy to support the regeneration of Morden including growth in residential within the town centre was already considered in Merton's Core Planning Strategy 2021 and associated</u>

	<p><u>sustainability appraisal. Several, site allocations to support this were considered in Merton's Sites and Policies Plan 2014, and associated sustainability appraisal. Policy supports reducing the dominance of traffic, improve the appearance, air quality and traffic barriers, which deter access around the town centre and links to surrounding assets such as the historic Morden Hall Park and Morden Park are supported.</u></p> <p><u>Since the 2009, the principle of regeneration thus, demonstrated via the public consultation feedback and evidence through successive Local Plans.</u></p>
<p><u>Mo1: Morden Regeneration zone (formally reference Mo4).</u></p>	<p><u>The extensive and long term due diligence and public consultation carried out by Merton Council and Transport for London on Morden regeneration has included exploring a number of alternative options. Prior to this local plan, only the sites to the north of London Road, on the same side as Morden underground station, were allocated for development. Further due diligence on housing capacity and development viability have resulted in the Local Plan proposal to allocate both sides of London Road as part of the Morden regeneration zone; this is explored further in evidence including Morden's Strategic Development Framework. In Stages 2 and 2a of the draft Local Plan, a wider regeneration zone was proposed for Morden town centre; this reasonable alternative has been proposed for removal following Stage 3 (regulation 19) to focus on the Morden Regeneration Zone.</u></p> <p><u>The alternative option of not progressing Morden regeneration at all was not considered a reasonable alternative as achieving comprehensive regeneration is supported by successive public consultation results, planning policy, due diligence development capacity studies and cross-party political support across more than 10 years for the regeneration of Morden (as cited in Morden Vision 2008).</u></p>
<p><u>Mo2 Farm Road</u></p>	<p><u>Small site allocated for residential development – no reasonable alternative. Planning permission (19/P4046) resolved and granted in 2020.</u></p>
<p><u>Mo3: Imperial Sports Ground Tooting and Mitcham Hub</u></p>	<p><u>The reasonable alternative option of not supporting development on Metropolitan Open Land is not taken forward as the development proposed for residential would be allocated only where this directly funded long-term capital investment in sporting facilities on Tooting and Mitcham Hub.</u></p>
<p><u>Mo4: Chaucer Centre Canterbury Road (formally reference Mo1)</u></p>	<p><u>Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process, no reasonable alternative.</u></p>
<p><u>Mo5: Morden Road Clinic and Morden Hall Medical Centre Morden Road,</u></p>	<p><u>Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process; allows for the retention of health and community services in the area and new</u></p>

	<u>homes– no reasonable alternative.</u>
<u>Mo6: York Close Car Park Morden</u>	<u>Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process, no reasonable alternative.</u>
<u>Gifford House</u> <u>Mo7: Gifford House, 67c St Helier Ave.</u>	<u>Site introduced at Stage 2a for residential uses. No reasonable alternative in location surrounded by homes.</u>
<u>Raynes Park neighbourhood policy and site allocations</u>	
<u>RP1: Amity Grove Clinic, Amity Grove, Raynes Park</u>	<u>Very small site – no reasonable alternative.</u>
<u>RP2: 245 -247 Burlington Road, New Malden</u>	<u>Site sits within a Locally Significant Industrial Site – no reasonable alternative but for commercial, service and community uses appropriate to the location setting.</u>
<u>RP3: Tesco, Burlington Road, New Malden</u>	<u>The alternative of allocating part of the site (the eastern portion) was considered and rejected. The London Plan recognises the potential for mixed-use retail and residential development and this site allocation would optimise this.</u>
<u>RP4: 80-86 Bushey Road, Raynes Park</u>	<u>This site already achieved planning permission in 2015 for a +10,000square metre retail, restaurant and leisure complex which has not been delivered. The alternative to allocate the site for industrial and logistics purposes only is not taken forward due to the greater need for new homes</u>
<u>RP5: All England Lawn Tennis Club Community Sports Ground</u>	<u>The reasonable alternative option of no development - is not supported. The site provides, an, opportunity for significant, sustained and long-term investment in sporting facilities support the Championships and to provide access to the local community</u>
<u>RP6: Land at the former LESSA Sports Ground Grand Drive,</u>	<u>The alternative of allocating the site for homes and sports is not considered reasonable while there remains sporting organisations who have approached the council stating that sporting uses can be delivered on the site.</u>
<u>RP7: Rainbow Industrial Estate Grand Drive</u>	<u>Site is allocated to align with the proposals contained in Merton's Core Planning Strategy 2011 and Merton's Rainbow Estate planning brief 2013</u>
<u>RP8: West Barnes Library 10 Station Road</u>	<u>Library and homes to be retained on small site – no reasonable alternative other than not to allocate</u>
<u>Wimbledon neighbourhood policy and site allocations</u>	

<u>Wi1: Battle Close, North Road, Wimbledon</u>	<u>The allocation itself presents reasonable alternatives, as it is for a range of uses either mixed or on their own: community (including education, sports, leisure and residential).</u>
<u>Wi2: Broadway Car Park, Land Adjoining New Wimbledon Theatre, 111-127 The Broadway, Wimbledon</u>	<u>Allocation supports a wide range of town centre use for the centre, including community and cultural uses. The alternative use of including residential is not taken forward given the other opportunities in the borough for residential development and the limited scope within Wimbledon town centre, the borough's only major centre with a viable cultural and office market.</u>
<u>Wi3: All England Lawn Tennis Club - Church Road, Wimbledon</u>	<u>The Wimbledon Championships is the best known tennis competition in the world and is the reason for Wimbledon's strong reputation, which drives a range of economic factors including business location, branding, higher property prices and tourism (internal to the UK and internationally). The AELTC acquired the Wimbledon Park golf course and proposed the site for allocation to expand the tennis championships across Church Road and to include capacity to host the grass court qualifying event, which currently takes place at Roehampton until c2030. Wimbledon Park is a Grade II listed historic park and garden on the Heritage at Risk register due to the incoherent land management brought about by its fragmented land ownership and use. Substantial concerns have been raised by representors, particularly since the submission of planning application 21/P2900, about the potential impacts of both the site allocation and the planning application 21/P2900 on the historic environment and the protected open space designations. The alternative of not supporting the allocation of site Wi3 for international sporting uses was considered. However Merton's Playing Pitch Strategy does not demonstrate a need for further golf facilities; the opportunities to address the fragmented land ownership and management issues and thereby potential to take action to remove the Grade II* park from the Heritage at Risk register. The opportunity to introduce public access into and through the historic landscape and the opportunity to maintain Wimbledon's global recognition as a quality location and the associated benefits locally were also factors in considering initially whether to support the allocation. The site allocation continues as designated open space and Metropolitan Open Land as supported by the findings of Merton's Green Infrastructure Study 2020, national policy and the London Plan.</u>
<u>Wi5: Hartfield Road Car Park, 42-64 Hartfield Road, Wimbledon</u>	<u>The allocation supports a wide range of town centre uses suitable for Wimbledon as the borough's only major centre. Feedback from public consultation has proposed that this site allocation specifies a concert hall or similar venue; this can already be delivered as the allocation includes assembly and leisure.</u>
<u>Wi6: Highlands House, 165-171 The</u>	<u>No reasonable alternative - allocation supports a wide range of town centre uses suitable for a town</u>

<u>Broadway, Wimbledon</u>	<u>centre</u>
<u>Wi7: Rufus Business Centre, Ravensbury Terrace, Wimbledon Park</u>	<u>Site allocation use is for a mixed-use development consisting of both employment (business/light industrial and residential uses, this is in keeping with its location, site constraints cumulative impacts and other sites in the area with planning permission.</u>
<u>Wi8: South Wimbledon Station, Morden Road, South Wimbledon</u>	<u>The allocation supports a wide range of uses suitable for an accessible site within an opportunity area so the reasonable alternatives are contained within the allocation.</u>
<u>Wi9: 28 St George's Road, Wimbledon</u>	<u>Allocation supports a wide range of uses including community use, suitable for an opportunity area including, residential – suitable for its location and relationship with Wimbledon town centre. No reasonable alternative other than not to allocate the site or restrict the allocation to fewer uses, which is not justified.</u>
<u>Wi10: Prospect House, 30 St George's Road, Wimbledon</u>	<u>No reasonable alternative – the site is in a commercial area of the town centre. The allocation will support the economy and/or tourism.</u>
<u>Wi11: Victoria Crescent, 39-59 The Broadway, 1-11 Victoria Crescent, Wimbledon</u>	<u>The site's allocation supports a wide range of uses suitable for a major town centre located within an opportunity area, including some residential on upper floors. The alternatives are contained within the allocation. No reasonable alternative other than not to allocate the site or restrict the allocation to fewer uses, which is not justified.</u>
<u>Wi12: Wimbledon Stadium and Volante Site - Plough Lane and Summerstown Road, Wimbledon Park</u>	<u>No reasonable alternatives. Site allocation already considered in the Sites and Policies Plan 2014 and associated sustainability appraisal process; allows for Intensification of sporting activity with supporting enabling development. Most of the site already developed bar approx. 25%, which has planning permission that has not be delivered.</u>
<u>Wi13: 8-20 Worple Road and 20-26 St George's Road Wimbledon</u>	<u>The allocation supports a wide range of uses suitable for a major town centre and opportunity area including scope for residential. No reasonable alternative other than not to allocate the site or restrict the allocation to fewer uses, which is not justified.</u>
<u>Wi15: YMCA Wimbledon 196-200 The Broadway, Wimbledon</u>	<u>The site is currently a YMCA and hostel in Wimbledon town centre and within the Opportunity Area. The site allocation will ensure a YMCA still operates at the site with supporting uses.</u>
<u>Wi16: Centre Court Shopping Centre, The Broadway, Wimbledon</u>	<u>The proposed allocation supports a wide range of uses suitable for a major town centre. With the aim of revitalising the shopping centre. No reasonable alternative other than not to allocate the site or restrict the allocation to fewer uses, which is not justified.</u>

Appendix C: Comments from statutory bodies

- i. In accordance with Part 3 Environmental Reports and Consultation Procedures (6), the Council is required to consult with consultation bodies namely – Environment Agency, Historic England and Natural England on the SA/SEA for 5 weeks. Figures below shows the feedback from the Bodies and the Councils actions.

Figure A: Comments from the Statutory Bodies - SA Scoping Report and environmental report November 2018

<u>Statutory body</u>	<u>Feedback received</u>	<u>Councils action(s)</u>
<u>Environment Agency</u>	<p><u>'Flood risk management throughout the SEA is encouraging, especially seeing as some of the development sites are expected to deliver reduction in overall flood risk'.</u></p> <p><u>Currently, the SEA does not recognise the interaction between these different sustainability objectives</u></p> <p><u>The SEA demonstrates that there is a lack of certainty or policy to ensure a Biodiversity net gain. Paragraph 170 of the NPPF</u></p>	<p><u>Welcomed.</u></p> <p><u>Noted and incorporated in next stage SA/SEA and submission SA/SEA.</u></p> <p><u>Comment supports SA/SEA findings – which informed the policy moving forward, supported by local evidence.</u></p>
<u>Natural History</u>	<p><u>Natural England does not consider that this SEA/SA scoping report and Habitat Regulation Assessment poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</u></p>	<p><u>No action needed</u></p>
<u>Historic England</u>	<p><u>Provided link to Historic England advice note on SA/SEA.</u></p>	<p><u>Welcomed.</u></p>

Figure B: Comments from the Statutory Bodies - Sustainability Appraisal pre-submission December 2020

Statutory body	Feedback received	Councils action(s)
<u>Environment Agency</u>	<p><u>Suggested review other plan/strategies to be included is the SA/SEA 'Review of plan's'</u></p> <p><u>EA: comments can be viewed here</u></p>	<p><u>The Council reviewed these plans/strategies and where, appropriate include them in the next stage of the SA/SEA process.</u></p>
<u>Natural History</u>	<u>No comments received.</u>	n/a.
<u>Historic England</u>	<p><u>Suggested review other plan/strategies to be included is the SA/SEA 'Review of plan's'</u></p> <p><u>Considers the SA/SEA highlight opportunities for that the historic environment can make a significant contribution to the success of development and there may be opportunities for enhancement of the historic environment.</u></p> <p><u>Made suggestion for key issues starting point. These were as followed:</u></p> <ul style="list-style-type: none"> <u>• Conserve and enhancing designated and non-designated heritage assets and the contribution made by their setting</u> <u>• Heritage assets at risk from neglect, decay or development pressures</u> <u>• Area where there is likely to be further significant loss or erosion</u> 	<p><u>The Council reviewed these plans/strategies and where, appropriate include them in the next stage of the SA/SEA process.</u></p> <p><u>The considerations are embedded in a number of design and green infrastructure policies the contribution of historic asset to the local environment. In addition, the Health and wellbeing policy HW12.1 acknowledges the important of access to historic asset (including parks) to mental health and wider determinants of health.</u></p> <p><u>The key issues have been incorporated into next stage of the SA/SEA process where, appropriate. The new wording do not change the direction of the Local Plan but strengthens the SA/SEA monitoring indicators for the Council which were considered by the Council but omitted within this SA/SEA and was already a consideration in the policies such as design, green infrastructure a eh</u></p>

	<p><u>of landscape/townscape character or quality or where development has had or is likely to have significant impact on (direct or indirect) upon the historic environment and /or people's enjoyment of it.</u></p> <ul style="list-style-type: none">• <u>Traffic congestion, air quality, noise pollution and other problems affecting historic environment.</u>	<p><u>se In addition the approaches were already in policies.</u></p>
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Figure C: Comments from the Statutory Bodies Sustainability Appraisal pre- submission July 2021

Statutory body	Feedback received	Councils action(s)
<p><u>Environment Agency</u></p>	<p><u>We welcome the updated Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) July 2021, which has been updated to include the strategies and plans we highlighted in our last consultation responses such as EA2025 and the Governments 25 year environment plan.</u> <u>Recommend adding two updated plans.</u></p> <p><u>Suggested indicators</u> <u>Flood risk and climate change:</u></p> <ul style="list-style-type: none"> • <u>Number and location of Environment Agency flood warnings issued across</u> • <u>Merton each year.</u> <p><u>Water quality</u></p> <ul style="list-style-type: none"> • <u>Number and location of water pollution incidents reported to the Environment Agency across Merton annually.</u> • <u>Water quality status of water bodies across</u> <p><u>Merton Open space and nature</u></p> <ul style="list-style-type: none"> • <u>Metres of main river improved and restored across Merton</u> • <u>Biodiversity Net Gain delivered across Merton.</u> 	<p><u>Removal of two out of date plans and replaced with current plan(s).</u></p> <p><u>The Council welcomed the suggested indicators. The Council is of the view that adding to the existing indicators does not change the direction of the Local Plan. The additional indicators will ensure monitoring of environment issues. The changes are minor, and no further consultation needed.</u></p>
<p><u>Natural England</u></p>	<p><u>'Natural England have no comments to make on this consultation'.</u></p>	<p><u>Welcomed.</u></p>
<p><u>Historic England</u></p>	<p><u>Our comments on the Sustainability Environmental Assessment remain as set out in letter dated 4 February 2021.</u></p>	<p><u>These have been considered and included in the Submission SA/SEA. The changes are considered minor and no further consultation is required.</u></p>