

London Borough of Merton

0D5i - dated 02 March 2022

Contained within Document LBM01 in response to the Inspectors preliminary matters

**Sustainability Appraisal and Strategic Environmental Assessment
(SEA) supplementary report**

**Main Modifications for the Local Plan -
Planning Inspector Preliminary Questions**

March 2022

1. Non-technical summary

- I This report is a non-technical summary of Merton's Local Plan and Policies Map (herein referred to as 'the Plan') submitted to the Secretary of State on 2 December 2021. In January 2020, the council received a letter from the Planning Inspectorate on [Preliminary Matters for the Council \(INSP01\)](#). The Main Modifications Sustainability Appraisal Report (SA Supplement) has been prepared to provide an overview of the assessment of the Main Modifications to the plan following the Inspectors preliminary questions.
- II As stated in the Inspectors letter (dated 28 January 2022) '*Main Modifications (MM) can only be made to development plan documents where they are necessary for soundness and/or legal compliance, and only where they are recommended by Inspectors appointed to examine them. Moreover, such MM would be subject to public consultation at the appropriate point of the examination, in accordance with the arrangements set out in Section 6 of the Procedure Guide*'.
- III. This report in line with requirements of Annex I of the Strategic Environmental Assessment (SEA). This report supplements the Submission Sustainability Appraisal/Strategic Environmental Report, submitted to the [Secretary of State on 02 December 2021](#). This supplementary report is required to ensure that any potential social, environmental and economic effects of the proposed Main Modifications is examined for, significant sustainability impacts.

Context and legislation

- IV Context and legislation the Submission Sustainability Appraisal report considers in detail the requirements of the SEA Directive, considered as an integral part of the assessment in this Sustainability Appraisal (SA) supplement. These are as follows:
 - a) Contents, main objectives of the Plan and relationship with other relevant plans and programmes
 - b) The relevant aspects of the current state of the environment, and the likely evolution thereof without implementation of the Plan
 - c) The environmental characteristics of the area
 - d) Any existing environmental issues

Sustainability Objectives

- v. The Sustainability Objectives used to assess the sustainability implications of the proposed Main Modifications listed below (Figure 1). These were developed and refined as part of the SA Scoping and preceding SAs to submission stage.

Figure 1: Sustainability Appraisal Objectives

Sustainability Objectives
<p>Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</p>
<p>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).</p>
<p>Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.</p>
<p>Sustainable land use To make the best and most efficient use of land to support sustainable patterns and forms of development.</p>
<p>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.</p>
<p>Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</p>
<p>Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</p>
<p>Noise and vibration To minimise noise, vibration levels and disruption to people and communities.</p>
<p>Water quality To protect and enhance Merton's water bodies.</p>

<p>Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</p>
<p>Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</p>
<p>Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</p>
<p>Energy use To manage and reduce demand for energy.</p>
<p>Health and wellbeing. To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</p>
<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>
<p>Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.</p>
<p>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.</p>
<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>Local employment To develop and maintain a healthy labour market.</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>Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.</p>

Sustainability background

- V. This SA/SEA report appraises significant changes, which have not, been appraised previously through the Plan preparation process.

Figure: 2: SA/SEA at each Local Plan process.

Key Appraisal Outputs (publication of SA Reports)	Timescale
SA Scoping Report: SA Tasks A1-A5	2018-2021
SA Report on Issues & Options: SA Tasks B1-B6	Stage 2: November 2018-January 2019 Stage 2a: November 2020-February 2021
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)
SA Report on Submission Draft incorporating minor changes: SA Tasks C1 and D1-D2	November 2021.
TBC: SA Tasks C1 and D1-D2	TBC
TBC: SA Tasks C1 and D1-D2	TBC
SA Report on modifications arising from Inspector's Report SA Task D3	TBC
TBC: SA Tasks E1 and E2	TBC

Likely significant effects

- VII As part of the SA process, local authorities are required to determine the likely significant effects of the proposed Main Modifications on the social, environmental and economic sustainability objectives. It is important to note that this appraisal has focused on the impact of the proposed Main Modifications only and not the supporting text or policy to which they relate.

Figure 3: Summary of Main Modification

	Proposed modification	Additional SA needed
<p>Plan period and strategic policies.</p> <p>The Inspector's comments (para 11) - <i>'The Framework requires strategic policies to look ahead over a minimum 15-year period from adoption (at paragraph 22). The Local Plan contains strategic policies and covers the period 2021/22 to 2035/36 (as indicated in Figure 4.2.1 of the plan). However, the plan is unlikely to be adopted until 2022/2023, as hearing sessions would need to avoid the London pre-election period (see also the paragraphs on hearing arrangements, below).'</i></p>	<p>To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year plan period to be 2022/23 - 2036/37.</p>	
<p>National Planning Policy Framework (NPPF).</p> <p><i>The Inspector's comment (Para 18) - 'The revised Framework was published on 20 July 2021 but, as set out above, the date that the Local Plan was published is unclear. Consequently, it may be appropriate for the Council to undertake a check (if not undertaken already), to confirm that the plan is consistent with the latest version of the Framework. The Council should supply us with the suggested wording for any MM which may be needed as a result. As a minimum, proposed changes should ensure that any references to superseded versions of the Framework, and out-of-date paragraph numbers should be updated as appropriate.</i></p>	<p>Amendments made throughout the Plan have been made to clearly state NPPF 2021</p>	<p>No, There are no sustainability implications and no likely effects to the policy or the Plan.</p>
<p>Supplementary Planning Documents (SPD).</p> <p>The Inspector's comment Para 37) - <i>Several policies require developments to meet requirements contained in supplementary planning documents (SPDs) or similar pieces of guidance. These and other pieces of guidance are not development plan documents (DPDs) and thus do not have the statutory force conferred on local plans by virtue of section 38(6) of the 2004 Act.</i></p>	<p>To ensure that the policy is justified and legally sound, all policy requirements to conform to SPD removed or amended.</p>	

VIII. Appendix A show the full list of Main Modification at this stage. These have ‘no sustainability implications’ and ‘no likely effects’ to the policy or the Plan and can be carried forward.

Mitigation measures

IX. Given the limited impact of the Main Modifications on the sustainability objectives, no other mitigation measures are not proposed or needed aside from those already identified in the submission SA.

Selection of alternatives

X. The sustainability appraisal process requires local authorises to consider alternative options, and to assess sustainability implications of these. As the Plan preparation process, alternatives have, been considered during the SA process including the submission sustainability appraisal.

Monitoring

XI. The council will continuously monitor the effects of the policies in sustainability terms and report on the outcome of this through the Authority Monitoring Report (AMR).

SA/SEA Technical report

1 Purpose of sustainability appraisal

- 1.1 This report is a technical report of Merton's Local Plan and Policies Map (herein referred to as 'the Plan') submitted to the Secretary of State on 2 December 2021. In January 2020, the council received a letter from the Planning Inspectorate [Preliminary Matters for the Council \(INSP01\)](#) (dated 28th January). The Main Modifications Sustainability Appraisal Report (SA Supplement) has been prepared to provide an overview of the assessment of modifications (main and additional) of the plan following the Inspectors preliminary questions.
- 1.2 Under [section 20\(7C\) of the 2004 Planning and Compulsory Purchase Act as amended](#)) Main Modifications (changes that materially affect the policies) to make a submitted local plan sound and legally compliant. The council can also put forward additional modifications of its own to deal with more minor matters. These tend to be to provide clarity or can be grammatical edits and changes.
- 1.3 Preparation of this report is in line with requirements of Annex I of the Strategic Environmental Assessment (SEA and supplements the Submission Sustainability Appraisal/Strategic Environmental Report submitted to the Secretary of State on 02 December 2021.
- 1.4 This supplementary report seeks to ensure the potential social, environmental and economic effects of the proposed Main Modifications are considered. Furthermore, also for significant sustainability impacts, and reported on as part of the Plan making process.

Context and legislation

- 1.5 The submission SA/SEA (December 2021) considers in detail the requirements of the SEA Directive, considered as an integral part of the assessment in this SA Supplement. These are as follows:
- a. Contents, main objectives of the Plan and relationship with other relevant plans and programmes
 - b. The relevant aspects of the current state of the environment, and the likely evolution thereof without implementation of the Plan
 - c. The environmental characteristics of the area
 - d. Any existing environmental issues
- 1.6 The remaining requirements of the SEA Directive are explained below

Sustainability Objectives

- 1.7 Sustainability objectives The Sustainability Objectives used to assess the sustainability implications of the proposed Main Modifications and Amendments, listed in figure 1. These were developed and refined as part of the Sustainability Appraisal Scoping process, preceding this report.

Sustainability background

- 1.8 This SA/SEA report appraises significant changes, which, have not, been appraised previously through the Plan preparation process.

Figure 4: SA/SEA timetable and stages

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.

1.9 Collectively, the sustainability reports are prepared in accordance with government guidance on Sustainability Appraisal and incorporate the requirements of the Strategic Environmental Assessment Directive 2001/42/EC

1.10 The council examined Main Modifications to; determine if, any through earlier SA/SEA whether, assessed already and whether an additional appraisal is required. Where it was determined that an additional appraisal of the sustainability effects was required, the appraisal was undertaken using the criteria in figure 6. The assessment used the sustainability objectives and SA framework developed and refined through the Scoping process, used in the all the Plan's SA/SEA since 2018.

2 Appraisal methodology

2.1 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 5: Sustainability Appraisal process

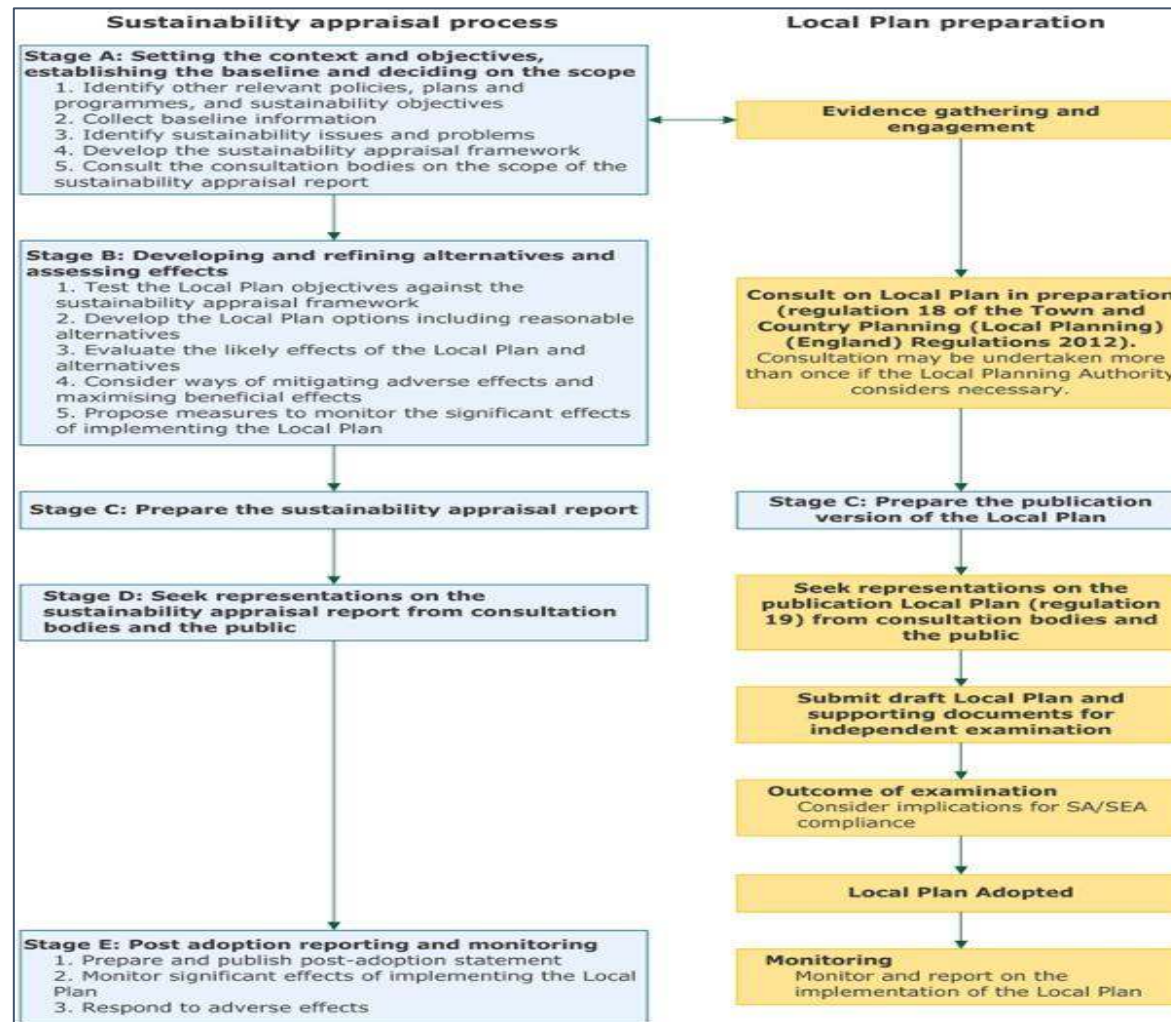


Figure 6: SA scoring matrix (used in all SA/SEAs)

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

2.1 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.

2.2 The step the council took was to assess each Main Modification to determine whether additional appraisal was required. In addition, whether in earlier SA/SEAs it had been appraised previously

2.3 Where it was determined that an additional appraisal of the sustainability effects was required, the appraisal was undertaken using the criteria in figure 6. The assessment used the sustainability objectives/Sustainability Appraisal Framework developed and refined through the Scoping process, used in the all the Plans SA/SEA since 2018.

Considering alternative options

2.4 The SA/SEA process requires local authorities to consider alternative options and to assess sustainability implications of these. As the Plan preparation process, the SA/SEA scoping and submission reports have already examined alternatives.

- 2.5 In light of the need to prepare Main Modifications and to consider, proposed alternatives to these relate to the existing text or policy, in the submission Plan. In this respect, it is important to note that where the proposed Main Modification related to amendments or insertions to text of policies, the appraisal focused on the outcomes in terms of the proposed main modification itself, not the original policy or text, which would have already been subject to sustainability appraisal through earlier stages.

3 Proposed Main Modifications

- 3.1 The council has finalised its schedule of Main Modifications subsequent to the Inspector's preliminary questions. These modifications address issues raised by the Inspector together with further changes proposed by the council. The proposed Main Modifications set out in full in Appendix X. The summary below takes account of the initial assessment of sustainability implications and signposts which modifications require further sustainability appraisal because of this initial assessment.

Cumulative and synergistic effects

- 3.2 An assessment of the cumulative and synergistic effects is required to ensure the Main Modifications are examined in, the wider context of their 'in- combination' effect on the sustainability objectives. It is also important to consider the additional modifications in light of existing planning strategies, plan and policies that remain unchanged.
- 3.3 There are no significant cumulative or synergistic effects and importantly; it is not believed that, the cumulative and synergistic effects of the proposed main modification a) require further action, or b) identification of additional mitigation measures.

4 Sustainability Appraisal Assessment results

- 4.1 This section of the report summarised the outcomes of the appraisal of those Main Modifications that were identified as requiring further assessment. The initial assessment determined which of the proposed main modifications were likely to have sustainability impacts and required further assessment. Following the assessment it is apparent there are no sustainability implications and 'no likely effects' either to individual policy or the whole Plan.

5 Monitoring

- 5.1 The supplementary SA/SEA report is developed taking into account other local, regional, national and European plans and guidance. The SEA Directive requires that: “*Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*” (Article 10.1).”
- 5.2 .Government guidance on SA for development plans states that SA Reports ‘*shall include a description of the measures envisaged concerning monitoring and those proposals*’. Therefore monitoring should be considered at an early in the SA process, included in the SA Report. Furthermore, reviewed in the light, of any responses to consultation.
- 5.3 Therefore, the council needs to ensure that monitoring is appropriate for Plan, monitoring is up-to-date, reliable, and sources are referenced. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken. It is worth bearing in mind that it may be difficult to implement monitoring mechanisms for unexpected effects. The council will monitor the Plan and will publish the results of in the AMR. Contingencies procedures have been developed to identify and address poor performance against objectives or unforeseen adverse impacts of the local plan

6 Conclusion

- 6.1 The proposed Main Modifications do not change the direction of the Plan in terms of the strategic objectives and the vision of the Plan. All the Main Modifications proposed are in conformity with the National Planning Policy Framework (2021) and the London Plan (2021).

Main Modification

- 6.2 The assessment of the proposed Main Modifications has resulted in mainly positive effects on the sustainability objectives and no further amendments or mitigation measures are proposed. The assessment has also demonstrated that there are no significant cumulative negative impacts of the modifications, nor is there any impact on the internationally designated areas as defined by Habitats Regulations Assessment. It is therefore, considered that the proposed Main Modifications are the most appropriate alternative option and therefore appropriate be taken forward.

Appendix A: Proposed Main Modifications dated March 2022 (figure 7).

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM1.1	14	1 st sentence below sub heading: Identifying Merton's Growth areas	A considerable proportion of Merton's growth up to 2036/37 and beyond is, expected to be, delivered in the Opportunity Area (OA). The OA is, designated in the London Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton's OA.	To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year plan period to be 2022/23 - 2036/37.	March 2022 – response to Inspectors' preliminary matters
MM1.1	32	Spatial vision, 1 st sentence	By 2036/37 Merton will:	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM1.1	37	2.1.11	<p>Current housing projections for Merton indicate that <u>a minimum of 11,374 additional homes will be built during the plan period around 29,000 new dwellings could be built in Merton between 2021 and 2050</u>. Policy must therefore ensure that new development in Merton does not create a legacy of poor performance that will require remedial action in the future and add to Merton's retrofit burden. In their Climate Emergency Design Guide (2020), the London Energy Transformation Initiative (LETI) concluded that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025.</p> <p>Footnote 2 - <u>Refer to Policy H11.2. Based on sites identified to be delivered during the 15 year plan period and an assumed delivery of the Intend to Publish London Plan 2021 target for Merton of 918 new dwellings per year for the remaining 15 years to 2050. See Housing policies for further details.</u></p>	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM1.1	373	Places & Spaces in a Growing Borough,	The need to deliver more than 10,000 homes in Merton by 2036/37 does not outweigh the need for developments to be design-led. The Council will require all development to be of the highest design quality and contribute to the Merton's	See above MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters

		Introduction, 2 nd paragraph	long-term economic prosperity, quality of life and a net zero carbon future.		
MM2.1	35	2.1.1	In accordance with Paragraph 149 of the NPPF 2019 and Paragraph 1523 of the Draft NPPF 2021, 'Plans should take a proactive approach to ...	To improve accuracy and demonstrate the soundness of the Local Plan with regards to the latest NPPF published July 2021. Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors' Preliminary Letter March 2022	March 2022 – response to Inspectors' preliminary matters
MM2.2	42	Policy CC2.2 Minimising Greenhouse Gas Emissions, part b	To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended.	March 2022 – response to Inspectors' preliminary matters
MM2.2	51	Climate Change CC2.3 Minimising Energy Use, part e	From <u>01 January</u> 2025, to meet the <u>following</u> maximum Energy Use Intensity targets as set out in the relevant guidance.: <ul style="list-style-type: none"> ○ <u>Residential – 35 kWh/m2/yr</u> ○ <u>Offices – 55 kWh/m2/yr</u> ○ <u>Schools – 65 kWh/m2/yr</u> ○ <u>Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr</u> ○ <u>Retail – 55 kWh/m2/yr</u> ○ <u>Leisure – 100 kWh/m2/yr</u> ○ <u>Higher education teaching facilities – 55 kWh/m2/yr</u> ○ <u>Light industrial uses – 110 kWh/m2/yr</u> ○ <u>GP surgery – 55 kWh/m2/yr</u> ○ <u>Hotel – 55 kWh/m2/yr</u> 	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended. Specific Energy Use Intensity targets were added instead based on new evidence commissioned by Greater Cambridge Shared Planning.	March 2022 – response to Inspectors' preliminary matters

MM2.2	56	2.3.22 and new paragraph	<p>Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to future-proof their development and lead the way in decarbonising Merton until EUI targets are required through national regulations or a locally derived methodology. Merton Council will enforce EUI targets from 2025; these targets will be confirmed in relevant guidance closer to the time in order to consider the latest evidence and technologies. In 2021, Etude carried out a feasibility study [25] to inform the Net Zero Carbon Evidence Base for the Greater Cambridge Local Plan [26] which identified the following Energy Use Intensity targets for a range of development types:</p> <ul style="list-style-type: none"> • Residential – 35 kWh/m2/yr • Offices – 55 kWh/m2/yr • Schools – 65 kWh/m2/yr • Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr • Retail – 55 kWh/m2/yr • Leisure – 100 kWh/m2/yr • Higher education teaching facilities – 55 kWh/m2/yr • Light industrial uses – 110 kWh/m2/yr • GP surgery – 55 kWh/m2/yr • Hotel – 55 kWh/m2/yr 	<p>See above -MM2.2 at Page 51 Plan Ref. Policy CC2.3, part e.</p> <p>References also added.</p>	<p>March 2022 – response to Inspectors’ preliminary matters</p>
-------	----	--------------------------	--	--	---

			<p><u>New Paragraph - Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to reduce fuel bills for future occupants and help tackle fuel poverty in Merton, and to future-proof their development and lead the way in decarbonising Merton. These targets, or subsequently adopted targets, will be enforced from January 2025.</u></p> <p><u>[25] Bioregional, Etude, Currie & Brown, "Greater Cambridge Local Plan: Net Zero Carbon Evidence Base. Task D - Technical Feasibility," May 2021. [Online]. Available: Feasibility study https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/NetZeroTechnicalFeasibility_GCLP_210831.pdf.</u></p> <p><u>[26] Bioregional, Etude, Currie & Brown, Mode, "Greater Cambridge Net Zero Carbon Evidence Base Non-technical summary," August 2021. [Online]. Available: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Greater%20Cambridge%20Local%20Plan%20Net%20Zero%20Carbon%20Evidence%20Base%20-%20Non%20Technical%20Summary%20FINAL.pdf.</u></p>		
MM2.2	255	Policy N7.1 part d	Support developments in the Local Centre that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road	See above MM2.2 at page 51.	March 2022 – response to Inspectors' preliminary matters

			and Merton Road to improve their shopfronts and building facades;		
MM2.2	268	Policy N9.1, part h	h. Promoting good placemaking by providing places for people to meet, relax, enjoy events and participate in the town centre. as set out in the public space framework in the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	281	Site Allocation Wi2	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	288	Site Allocation Wi5	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	290	Site Allocation Wi6	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	299	Site Allocation Wi9	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	302	Site Allocation Wi10	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	305	Site Allocation Wi11	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters

MM2.2	311	Site Allocation Wi13	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in-line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	314	Site Allocation Wi15	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in-line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	318	Site Allocation Wi16	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in-line with the height parameters set out in <u>having regard to</u> the Future Wimbledon SPD.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	334	Policy H11.1, part i	For schemes of 10 homes and above, affordable housing is required to be provided on-site. In exceptional circumstances, where the applicant has robustly demonstrated to the council that on-site provision is not feasible, we may consider a financial contribution equivalent. This justification must include the provision of a detailed financial appraisal. For these schemes, off-site and cash in lieu schemes must accord with the requirements set out in The London Plan and <u>have regard to</u> the Mayor’s Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	346	Policy H11.2, part c	Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 <u>and having regard to</u> Merton’s design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters

MM2.2	374	Policy D12.1, part a	Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and <u>have regard to</u> existing and emerging good practice guidance.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	378	Policy D12.2, part a	Be of the highest standard and <u>have regard adhere</u> to the most appropriate policy guidance and best practice.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	544	Policy P15.10, part b	Several policies in the local plan contribute to reducing and/or mitigating the impacts of air pollution such as transport, green infrastructure, design and climate change polices. Developers must <u>have regard to follow</u> any guidance provided by Merton Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	546	Policy P15.10, part r	Development proposals for leisure, sport and/or play facilities must <u>have regard to follow</u> Sport England’s Artificial Lighting Guidance and London Plan policy S5 Sports and recreation facilities.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.2	548	Policy P15.10, part bb, i	Its essential construction and demolition sites <u>have regard to follow</u> the Right Waste Right Place guidance and Waste Management Duty of care of practice to ensure construction and demolition waste is, managed correctly to prevent pollution and miss description of waste.	See above MM2.2 at page 51.	March 2022 – response to Inspectors’ preliminary matters
MM2.1	84	3.1.10	In this circumstance, we would not be able to encourage new town centre uses in Colliers Wood as supporting large “out of centre” shops, offices and leisure development is contrary to the NPPF (National Planning Policy Framework) 2019 <u>2021</u> (chapter 7), the London Plan and Merton’s own planning policies.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM3.1	121	Site Allocation Mi1 Benedicts Wharf	Approach to tall buildings: The size of the site allows for a masterplanned approach which could contain taller buildings <u>of up to 10 storeys subject to consideration of design policies.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters

MM3.1	161	Site allocation Mi16 Mitcham Gasworks	Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings <u>of up to 9 storeys</u> subject to consideration of <u>design policies impacts on existing character, heritage and townscape.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters
MM4.1	119	Site Allocation Mi1 Benedict Wharf	Further information: The draft South London Waste Plan <u>2024-2036 2022-2037</u> which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and has been submitted to the Sectary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.	To improve accuracy and ensure soundness, the plan period for the SLWP has been updated, in line with the current EiP process.	March 2022
MM4.1	502	14.3.30	In 2018, the London boroughs of Croydon, Kingston, Merton and Sutton started working on the next version of the South London Waste Plan, making the most of their strong track record and commitment to joint working and helping to deliver the new London Plan’s policies and de-risk the delivery of essential infrastructure for south London. The new South London Waste Plan will address waste management needs during the 15-year period from <u>2024 till 2036 2022 til 3027.</u>	See above MM4.1, page 119.	March 2022
MM3.1	233	Site allocation RP3 Burlington Road	Approach to tall buildings: The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings <u>up to 15 storeys subject to consideration of design policies.</u>	See above –Initial MM3.1 at Page 81 Plan Ref. Policy N3 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters
MM11.1	333	H11.1	<u>Strategic</u> policy H11.1 Housing Choice	To comply with NPPF para 20(a) - in response to Inspectors’ Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors’ preliminary matters
MM1.1	333	H11.1	(e.) Aim for the strategic target of 50% of new homes built in Merton between 2022/ <u>23</u> -2036/ <u>37</u> to be affordable.	See above - initial MM1.1 at Page 14	March 2022 – response to Inspectors’ preliminary matters
MM11.1	346	H11.2	<u>Strategic</u> policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspectors’ Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors’ preliminary matters

MM1.1	346	H11.2	We will aim to deliver a minimum of 41,732 11,374 additional homes for the period 2022/23 - 2036/37 2024/22-2035/36 .	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors’ preliminary matters
MM1.1	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 41,732 11,374 additional homes for the period 2024/22-2035/36 2022/23 – 2036/37 will come forward in Merton by:	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors’ preliminary matters
MM1.1	347	Supporting new paragraph after 11.2.4	<u>The SHLAA 2017 findings indicates that for Merton the target for the period 2029/30 to 2033/34 is 474 homes per annum then for the remaining period 2034/35 to 2036/37 increases to 548 homes per annum.</u>	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors’ preliminary matters
MM1.1	348	11.2.5	In accordance with the London Plan requirements and in consultation with and endorsed by the GLA, the housing trajectory set out in Figure 4.2.1 demonstrates how Merton’s housing target will be met for the Local Plan period 2022/23 – 2036/ 37 2024/22 – 2035/36 using a stepped housing delivery target.	See above - initial MM1.1 at Page 14	In response to Inspectors preliminary letter, March 2022
MM1	348	11.2.7 and Figure 4.2.2	As Figure 11.2.2 below indicates Merton’s annual housing target will be set at 775 700 homes per annum for the period 2022/23 2024/22 , increasing to 950 for the period 2025 /26 – 2027/28 2023/24 , and then increase to 4,080 1,555 for 2028/29 the period 2024/25- 2026/27 , then further increase to 1,350 for the period 2027/28 – 2028/29 . <u>This ensures that Merton’s Local Plan housing requirement for the Plan period 2022/23 – 2036/37 including the shortfall of 928 new homes is met.</u>	See above - initial MM1.1 at Page 14 Formerly AM11.8. <i>Moved to Main Modifications in response to Inspectors preliminary matters</i>	March 2022 – response to Inspectors’ preliminary matters

			<table border="1"> <tr> <td></td> <td>2021/ 22</td> <td>2022/ 23</td> <td>2023/ 24</td> <td>2024/ 25</td> <td>2025/ 26</td> <td>2026/ 27</td> <td>2027/ 28</td> </tr> <tr> <td>Merton Local Plan target</td> <td>775 750</td> <td>775 700</td> <td>775 700</td> <td>1,080 700</td> <td>1,080 950</td> <td>1,080 950</td> <td>1,080 950</td> </tr> <tr> <td>London Plan target</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> </tr> </table>		2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	Merton Local Plan target	775 750	775 700	775 700	1,080 700	1,080 950	1,080 950	1,080 950	London Plan target	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918		
	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28																						
Merton Local Plan target	775 750	775 700	775 700	1,080 700	1,080 950	1,080 950	1,080 950																						
London Plan target	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918																						
MM1.1	348	11.2.8	<p>In accordance with London Plan paragraph 4.1.11, Merton's target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings <u>and includes the rolling forward of the small sites target beyond 2029</u>. This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to <u>2036/37 2035/36</u> of <u>1,644 1,096</u> as indicated in the following table:</p> <table border="1"> <thead> <tr> <th>Plan period</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>2029/30 - 2033/34</td> <td>2,370</td> </tr> <tr> <td><u>2034/35 – 2036/37 2035/36</u></td> <td><u>1,644 1,096</u></td> </tr> <tr> <td>2029/30 – <u>2036/37 2035/36</u></td> <td><u>4,014 3</u></td> </tr> <tr> <td>Total</td> <td></td> </tr> </tbody> </table>	Plan period	Target	2029/30 - 2033/34	2,370	<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 1,096</u>	2029/30 – <u>2036/37 2035/36</u>	<u>4,014 3</u>	Total		See above - initial MM1.1 at Page 14 Formerly AM11.8. <i>Moved to Main Modifications in response to Inspectors preliminary matters</i>	March 2022 – response to Inspectors' preliminary matters														
Plan period	Target																												
2029/30 - 2033/34	2,370																												
<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 1,096</u>																												
2029/30 – <u>2036/37 2035/36</u>	<u>4,014 3</u>																												
Total																													
MM1.1	349	Figure 4.2.1	Figure 11.2.1 'Merton Housing Trajectory 2022/23 – 2036/37' updated – refer to Appendix 2	See above - initial MM1.1 at Page 14	March 2022 – response to Inspectors' preliminary matters																								

				Formerly AM11.10. Moved to Main Modifications in response to Inspectors preliminary matters	
MM2.2	390	Policy 12.1.g	Conserve and enhance Merton's heritage assets and distinctive character using Merton specific guidance, such as Merton's Borough Character Study and Conservation Area Appraisals.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	396	Policy 12.2.q	Prioritise pedestrians and cyclists and encourage greater walking and cycling for all around the area in accordance with Transport for London (TfL) Healthy Streets Approach.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	400	Supporting text: Additional point added after 12.2.9	<u>12.2.10 Transport for London's (TfL) Healthy Streets Approach provides information and guidance on how best to prioritise walking and cycling.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.1	402	12.5 a(i)	Principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, the London Plan, and Historic England guidance;	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.2	404	Policy 12.3.s	Provide well-designed cycle parking in accordance with London Plan minimum standards and TfL's London Cycle Design Standards that is well integrated with the overall design approach of the development and does not negatively impact on the primary street elevation.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	404	Policy 12.3.u	Ensure that the design and management of facilities for recycling, storage and disposal of household waste is designed to ensure efficient and effective waste collection, is well designed and is considered as in accordance with Merton's Waste and Recycling Storage Requirements and is part of the overall design approach and does not	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters

			adversely affect the primary building function, appearance of the building and character of the street.		
MM2.2	408	Supporting text: Additional point after 12.3.7	<u>12.3.8 TfL's London Cycle Design Standards provides requirements and advice for the design of dedicated cycle infrastructure.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM2.2	410	Supporting text: Additional point after 12.3.15	<u>12.3.16 Merton's Waste and Recycling Storage Requirements sets out guidance on the siting and design of waste and recycling facilities so that waste collection services in Merton can efficiently collect and dispose of household and other waste and recycling.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters
MM12.8	419	Policy 12.5.a	Development proposals affecting a heritage asset or its setting will be required to be in accordance with the following criteria: i. principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, <u>and</u> the London Plan, and Historic England guidance; ii. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b (for guidance) and also initial MM2.1 at Page 35 Plan Ref. 2.1.1 (for NPPF)	March 2022 – response to Inspectors' preliminary matters
MM2.2	422	Supporting text: Additional point after 12.5.2	<u>12.5.3 Historic England provides detailed guidance on best practice approaches when working with heritage assets. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study also provide borough specific guidance when working with heritage assets.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors' preliminary matters

MM2.2	426	Policy 12.6.1.b	<u>Wimbledon town centre, as set out within the chapter on Wimbledon and the Future Wimbledon supplementary planning document.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.2	427	Policy 12.6.2.k	They are informed by <u>have had regard to</u> the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.1	431	Para 13.1.1	The NPPF 2019 and 2021 draft states that planning policies...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.2	440	Policy 12.9.e	Shop-fronts must be of a high quality and well-proportioned and designed and should be designed in accordance with the council’s Shopfront Supplementary Planning Document 2017.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.2	441	Supporting text 12.9.1	Shop-fronts have a huge impact on the appearance of individual buildings and parades of shops. <u>Merton’s Shopfront SPD provides best practice design approaches for design and should be used when designing shop fronts.</u>	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	March 2022 – response to Inspectors’ preliminary matters
MM2.1	443	13.2.16	...in line with the “Agent of Change” approach in the NPPF 2021 2019 and in the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	443	13.3.2	The NPPF 2021 2019 paragraphs 8, 20 and 81 0 -91 2 , the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	456	13.5.2	The NPPF 2019 (and 2021 consultation draft) makes clear that local authorities should definte define the extent of the Primary Shopping Area and the town centre boundary. These are available on Merton’s Policies Map for each town centre.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters

MM2.1	456	13.5.4	The NPPF 2021 2019 and associated NPPG promotes	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.1	... the NPPF 2021-2019 (paras 86 0-91 0)...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.2	The NPPF 2021 2019 and the London Plan support the “town centres first” approach...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.4	As set out in the NPPF 2019 (and the 2021 draft) the Primary Shopping Area...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	465	13.6.5	In accordance with the National Planning Policy Framework 2019 (NPPF 2021 paragraph 90 , impact assessments will be required	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	471	13.8.1	The NPPF 2021 2019 , the London Plan and Merton’s strategic policies...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors’ preliminary matters
MM2.1	490	14.2.5	Sports and leisure facilities (including Playing Pitches), should be tested against paragraph 97 99 of the NPPF and considered against the requirements of London Plan Policy S5. ...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	First published in Document 0D4b Additional modifications in November 2021 for submission March 2022 – response to Inspectors’ preliminary matters
MM16.1	562	Para 16.1.2	As set out in t The Mayor’s Transport Strategy and the Government’s Decarbonising Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce set out the overarching policy framework and strategic approach to transport which focuses on reducing dependency on cars in favour of active, efficient and sustainable modes of travel.	Additional reference to newly published Decarbonising Strategy and associated wording amendment.	
MM16.2	565	T16.2d	Provide secure, covered and well-designed cycle parking facilities that meet or exceed London Plan standards (higher level minimum requirements) in accordance with London	November 21 Amendment made as proposed by TfL Spatial Planning and to ensure	November 21 Amendment made as proposed by TfL Spatial Planning and to

			Plan minimum standards (higher level) and London Cycle Design Standards.	consistency with London Plan policy T5 A 2 which states that “Developments should provide cycle parking at least in accordance with the minimum standards.”	ensure consistency with London Plan policy T5 A2 March 22. Response to Inspectors preliminary matters
MM2.2	571	T16.4d	Disabled <u>persons</u> ’ parking should be provided in accordance with London Plan standards and should <u>have regard to meet</u> design guidelines, be accommodated within the development site <u>where possible</u> and be provided with electric vehicle charge points.	See above - initial MM2.2 at Page 42 Plan Ref. Policy CC2.2, part b	
MM16.4	578	16.4.15	<u>For developments that comprise of a mix of dedicated private parking spaces and communal parking, the London Plan requirement for 20% active EV provision should be fully applied to any communal parking facilities. Developers should also refer to Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles (publishing.service.gov.uk) that may also be applicable to the development.</u>	Sentence added to provide clarity in relation to application of the London Plan standard for the provision of EV charge points for mixed developments. This is in response to newly published Government proposals for building regulation to require all new dwellings with dedicated parking space to have a charge point installed. For developments comprising a mix of units with communal parking and houses with private driveways, there is concern that a development could attempt to meet both the building regs requirement and the London Plan 20% standard by allocating charge points first to units with private parking and thus leaving communal parking facilities with no or inadequate EV charging provision.	March 2022

MM18.1	After page 583	After the Appendices title page, insert a new initial appendix	[See appendix 4 to this Schedule of Main Modifications]	To improve clarity regarding which adopted policies are superseded by the Local Plan and to ensure the effectiveness and regulatory compliance of the Local Plan.	March 2022 – response to Inspectors’ preliminary matters
MM19.1	After page 665	Insert new policy M19.1 Monitoring	<i>Refer to Appendix 3 for new policy wording</i>	To improve clarity of the proposed monitoring arrangements that will gauge the effectiveness of the policies and will help to inform the Local Plan review process, and therefore ensure the overall soundness of the Local Plan.	March 2022 – response to Inspectors’ preliminary matters