

# Planning Advisory Service (PAS) Local Plan route mapper toolkit part 4: Local Plan Soundness and Quality Assessment

The London Borough of Merton

November 2021

## Planning Advisory Service guidance notes

### Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is, intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

### How, to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows.

- Positively prepared: providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective: deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#).

Provide a brief answer to each question cross-referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. However, remember that the local plan

2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not.	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<p><b>Reason for score:</b> The Opportunity Area (comprising of Wimbledon, South Wimbledon, Colliers Wood as now identified on the emerging Policies Map and Morden) has an indicative minimum target range of homes (5,000) and jobs (6000) target set in the London Plan 2021 (0D32).</p> <p>Indicative housing ranges are outlined for each site allocation and are, determined by a number of factors; including planning application or pre-application engagement, representations from the landowner, appeals, high level assessments of site capacity based on local character, site size, any opportunities or restrictions affecting the site.</p> <p>In some cases, landowners or responders proposed more homes on specific sites in their representations. The ranges set in each site allocation are realistic for what can be, delivered prior, to a determined planning application at which very specific design matters, site circumstances and viability will be considered in more detail.</p> <p>For example a thorough assessment through the Merton Estates Local Plan (0D25) and subsequent planning applications justifies the numbers of new homes at the High Path Estate; Morden Town Centre Strategic Development Framework (5D1) and other evidence justifies new homes at Morden town centre. These projects have themselves informed Merton’s representations to the London Plan as it was being drafted, which resulted amendments to the Wimbledon-South Wimbledon-Colliers Opportunity Area in the London Plan (0D32) and the subsequent drawing of the Opportunity Area boundary in Merton’s emerging Local Plan.</p>				
		<b>Implications of taking no further action:</b> N/A				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A				
		<b>Reviewer Comments:</b> none.				

policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

### **How, to use the results of this part of the toolkit**

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	<i>Key questions</i>	<p><i>Assessment</i></p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
<b>Growth Strategy</b>		
<b>A</b>	In no more than 100 words (excluding any referencing), summarise your strategy for delivering growth and development in your area.	<p>To respond to our growth, we need to develop; the challenge is to maximise our limited space and balance competing priorities.</p> <p>Our Opportunity Area will bring significant jobs growth through a range of commercial development, alongside affordable new homes. Wimbledon – South Wimbledon – Colliers Wood Opportunity Area will inspire the redevelopment of brownfield land to intensify delivery of homes and jobs. Policies requiring high quality design and consideration of local character and heritage are both, supported by guidance. Outside the opportunity, area (Mitcham, Raynes Park) development will continue incrementally including specific development site allocations. Infrastructure will support housing and jobs growth.</p>
<b>B</b>	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	<p>Spatial designations such as, the Opportunity Areas in the London Plan have been key influencers in where growth will be directed in Merton. Complimentary to this was the identification of key development sites (sites allocations) and regeneration areas such as Morden regeneration zone – where landowners have confirmed intentions to develop their sites, contributing to the growth of the borough. Heritage and conservation considerations have influenced where growth will take place and the nature of it, for example through the identification of locations suitable in principle for tall buildings and high level assessments to determine indicative housing numbers for key development sites.</p>

C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery.	<p>Areas where growth is in principle supported and directed is our Opportunity Area including:</p> <ul style="list-style-type: none"> <li>• Wimbledon</li> <li>• Colliers Wood</li> <li>• South Wimbledon</li> <li>• Morden</li> </ul> <p>Merton’s Infrastructure Delivery Plan (14D4) outlines the deliver needed to support growth in Merton; it covers education, health, utilities, transport, digitals/broadband and other essential service to support growth.</p> <p>The nature of development means that large strategic sites that are fundamental to the council’s growth plans and are dependent on infrastructure investment do not exist in the same way as they do elsewhere in the country.</p>				
	1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?	-2	-1	0	+1
No, we do not meet this requirement			No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
<p><b>Reason for score:</b> The Good Growth chapter 1B sets out the council’s overall strategy for accommodating growth while the urban objectives and vision chapter 1C identify spatial priorities for key growth. Chapter 14 Housing provisions sets out how housing delivery will be, increased. Chapter 13 Economy and town centres provide clear direction on areas for commercial growth; Chapter 12 Places and Space in a growing borough set out a positive framework for development character including additional building height, and chapters 3-9 identifies key development sites.</p>						
<p><b>Implications of taking no further action:</b> none</p>						
<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> none</p>						
<p><b>Reviewer Comments:</b> none.</p>						

3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<p><b>Reason for score:</b> As with all London Boroughs, Merton’s approach to housing growth accords with the London Plan 2021 (0D32) rather than the standard method set out in national planning guidance. The London Plan 2021 (Od32), through evidence prepared as part of the London Strategic Housing Market Assessment (11D1) and London Strategic Housing Land Availability Assessment (11D2). Identified London-wide housing need and sought to identify capacity at a London-wide level to meet this need; to achieve this, the London Plan sets housing targets for each borough based on housing capacity – not individual borough need. As noted in Planning Practice Guidance (PPG, Paragraph: 013 Reference ID: 2a-013-20190220) local housing need can be established in a Spatial Development Strategy and does not therefore need to be revisited in Local Plans.</p> <p>The level of housing provides for an appropriate and justified buffer. Overall, Merton has identified sites with capacity to deliver 118% of the local housing requirement for the Local Plan period as set out in the housing trajectory in Chapter 11 and in the Housing Annual Position Statement (11D11). This gives greater confidence that sites should be available to deliver, subject to the market being able to support sustained delivery.</p> <p>In accordance with London Plan paragraph 4.1.10, Merton plans to achieve the housing requirement for the plan period through a stepped approach in Policy H11.2 Housing Provision.</p>				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> None.				

4.	Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully, considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> No green belt in Merton				
		<b>Implications of taking no further action:</b> n/a				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a				
<b>Reviewer Comments:</b> N/A						
5.	Is it clear how sites have been, selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> Yes. Public consultation stages (from Call for sites, stage 2, 2a and stage 3 public consultations) that, a thorough search of sites has been undertaken. The sites have then been, examined by or had regard to the appropriate evidence (including Sustainability Appraisal, Habitat Regulation Assessment and London Strategic Housing Land Availability Assessment) and are justifiably, allocated for development.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> none				
<b>Reviewer Comments:</b> At stage 2a (the second Reg18) several representors proposed additional sites for allocation in Merton's Local Plan. At this time (February 2021), the next stage was the publication of the Local Plan and residents, businesses, community groups and other parties would not have had any further opportunity for engagement on these new sites. Therefore no new site allocations were added after the second round of Regulation 18 (stage 2a) and where appropriate landowners were encouraged to pursue delivery through the planning application process						



6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> There are no designated neighbourhood areas in Merton				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move score to right:</b> None				
<b>Reviewer Comments:</b> None.						
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Yes, the site allocations identify the development requirements for each site and the specific infrastructure issues relevant to each site. The council engaged with a number of key infrastructure providers for example utilities companies, health and transport providers. This engagement helped to identify issues, propose mitigation measures for each site and there is a specific section “infrastructure requirements” for each site allocation that states these findings specific to each site. The Local Plan clearly states a requirement for developers to engage with the infrastructure providers at the earliest stage of design and layout planning and, to provide proof of such engagement as part of planning application process. As already states above, the local plan site allocations contain a range of homes for site allocated for residential based on market intelligence, planning application or pre-app consultation and site assessments.				
The Infrastructure Delivery Plan (14D4) helps to justify the general delivery of infrastructure, Many of the sites are, allocated for a mix of uses and the local plan does						

		not prescribe floorspace or proportions to allow for the necessary flexibility and changing market demand over the lifetime of the Local Plan.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> none.				
D	<p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this 'need' target?</p>	<p>The London Plan (0D32) sets an Opportunity Area an indicative minimum target for 6,000 jobs to be, created across the Plan period. This will be, achieved from the developments within the Opportunity area town centres, particularly the major centre of Wimbledon, and within the Strategic Industrial Locations. The Local Plan itself has not set non-residential floorspace targets. This is due to the additional flexibility afforded by changes to the planning system which allows for substantial change and flexibility across non-residential floorspace and also change to residential via permitted development</p>				
8.	<p>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be, met?</p>	-2	-1	0	+1	<b>+2</b>
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<p><b>Reason for score:</b> As already states above, the local plan site allocations contain a range of homes for site allocated for residential based on market intelligence, planning application or pre-app consultation, site assessments etc. As set out above, the Local Plan does not, set non-residential or jobs targets.</p>				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<p><b>Reviewer Comments:</b> It is not clear if this question refers to the non-residential floorspace targets (of which there are not any) or all targets. This seems to have already, been answered in Question 2.</p>				

9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Yes. The Local Plan is, supported by an Infrastructure Delivery Plan (14D4), which identifies infrastructure requirements over the plan period. Chapters 14 (Infrastructure), 15 (Green and blue infrastructure) and 16 (travel and urban mobility) set out policies that will guide windfall development. Each of the site allocations in the Local Plan contains an “infrastructure requirement” section to guide this development at a site-specific level. This was, informed by both information gathered from infrastructure providers to develop the Infrastructure Delivery Plan (14D4) and specific engagement and representations from infrastructure providers on specific sites.				
		<b>Implications of taking no further action:</b> none.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> The council’s Local Plan is not dependent on any one piece of infrastructure to deliver growth.				
10.	Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?  Have you identified the extent of any funding gap? If so, are you	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Yes. As set out above the Local Plan is, supported by an Infrastructure Delivery Plan (14D4), which identifies infrastructure requirements over the plan period. Chapters 14 (Infrastructure), 15 (Green and blue infrastructure) and 16 (travel and urban mobility) set out policies that will guide windfall development. Each of the site allocations in the Local Plan contains an “infrastructure requirement” section to guide this development at a site-specific level. This was, informed by both information gathered from infrastructure providers to develop the Infrastructure Delivery Plan (14D4)				

	<p>able to explain why you are confident that any gap can be, addressed?</p>	<p>and specific engagement and representations from infrastructure providers on specific sites. Thames Water, Transport for London, National Grid and the NHS all contributed to this. Separately, the council undertook additional research to inform specific infrastructure requirements, for example Merton's Playing Pitch Strategy 2019 (14D5) with Sport England and the National Governing Bodies for sports identifies the needs and infrastructure required (and potential costs) for playing pitches in Merton across a wide range of sports. Merton's Indoor Sports Facility Study 2020 (14D3) is similar. There is no one-sing new infrastructure on which Merton's growth depends.</p> <p><b>Implications of taking no further action:</b> Infrastructure delivery and future forecasting will continue throughout the delivery of this local plan, as it has for previous decades.</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> none</p> <p><b>Reviewer Comments:</b> As Merton is a London borough, many infrastructure matters are managed pan-London. For example the council works with Transport for London and the Mayor of London on funding and delivering travel and transport and road safety infrastructure and with the NHS South West London Clinical Commission Group on NHS services across south west London. Both TfL and the CCG contributed to the Local Plan and the Infrastructure Delivery Plan.</p>
<p>Process and Outcomes (see also Toolkit Parts 2 and 3)</p>		
<p>E</p>	<p>What are the cross boundary strategic matters affecting your local plan policies update? List these.</p>	<p>Merton's Duty to Cooperate report (0D13) and Statement of Common Ground (0D14) establishes our cross boundary agreement between neighbouring Local Authorities and identifies the strategic matters, they are:</p> <ul style="list-style-type: none"> <li>• Climate change</li> <li>• Housing</li> <li>• Economic growth</li> <li>• Flooding</li> <li>• Travel and transport</li> <li>• Waste</li> <li>• Green and open spaces</li> </ul>

		<ul style="list-style-type: none"> <li>Infrastructure</li> </ul>				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement √
		<b>Reason for score:</b> The Duty to co-operate statement (0D13) and Statements of Common Ground (0D14) sets out the strategic issues, which, the council has co-operated with our neighbouring boroughs and relevant bodies/organisations. No areas of difference or disagreement were identified however in some cases there was minimal response				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> Ensure ongoing dialogue and responses received.				
<b>Reviewer Comments:</b> As a London borough, the council also participates in continuous co-operation and engagement with neighbouring boroughs, other London boroughs and the Mayor of London. This includes: <ul style="list-style-type: none"> <li>Contributing to the Mayor's London Plan (0D32) and working on pan London projects such as the London wide Strategic Housing Land Availability Assessment (11D2) and setting each borough with its share of London's new homes</li> <li>Working on groups such as Urban Design London or the Association of London borough planning officers</li> <li>Working on the Local Implementation Plans (16D1) with other boroughs and Transport for London to deliver travel and transport infrastructure</li> <li>Working with the South London Partnership (five boroughs) on economic development, skills and other sub regional matters</li> <li>Working with specific neighbouring boroughs on joint planning related projects such as the Joint Waste Development Plan Document(the South London Waste Plans adopted 2012 (14D2) and submitted 2021 (14D1)</li> </ul>						

<p style="text-align: center;">F</p>	<p>Are there any aspects of the local plan policies update not in conformity with national policy? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites, which are below the threshold of major development as defined by national planning policy?</i></p>	<p>London Plan (0D32) Policy H4 (Delivering affordable housing) notes <i>‘that boroughs may also require affordable housing contributions from minor housing development in accordance with London Plan Policy H2 (Small sites).’</i> The council is seeking in Local Plan Policy H11.1 (Housing Choice) to require financial contributions from small sites (between 2-9 dwellings) in lieu of provision on site. This reflects Merton’s aim to optimise the delivery of affordable housing having regard to Merton’s predominance of small sites; historical low affordable housing delivery and exceptionally high levels of local need for affordable housing. Local Plan Policy H11.1 is supported by robust local extensive evidence as set out in Merton’s Strategic Housing Needs Assessment 2019 (11D8) and Merton’s Local Plan Housing Viability Study 2020(11D7) that show it can be sought without affecting viability and the number of homes that are anticipated to come forward from small sites.</p> <p>Draft Local Plan Climate Change Policies - Following Merton’s declaration of a Climate Emergency in July 2019, Merton’s Local Plan Climate Change policies have been updated to reflect the standards required to deliver Merton’s ambition of being a net zero carbon borough by 2050 in line with Merton’s Climate Strategy and Action Plan (2D1).</p> <p>National and regional policies do not go far enough to deliver the carbon savings required to meet our national, regional and local carbon targets. This is supported by evidence from the Committee on Climate Change (2D10, 2D11), the London Energy Transformation Initiative (2D9), the UK Green Buildings Council (2D44), and a study commissioned by several London boroughs investigating the role of carbon pricing in achieving greater carbon reductions on site (2D12).</p> <p>Our climate change policies (as set below) are therefore more ambitious and go beyond Building Regulations 2013 and the London Plan 2021, to ensure that all new development in Merton is compatible with our 2050 net-zero carbon target. Our policies are supported by national and regional evidence, which highlights the need for higher targets, as well as local evidence commissioned by several London boroughs investigating the role of carbon pricing in achieving greater carbon reductions on site (2D12). This is clear in supporting text in the Draft Local Plan Climate Change Policies.</p> <p>CC2.1 - This Strategic Policy sets out the overall aims of Merton’s climate change policies and the case for going beyond Building Regulations and the London Plan.</p>
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		<p>CC2.2 - This policy aims to drive further carbon savings on site, by:</p> <ul style="list-style-type: none"> <li>• Extending the Mayor’s zero carbon target to all minor new build residential development of one or more dwellings and all non-residential development of 500sqm GIA or more.</li> <li>• Increasing Merton’s minimum on-site carbon reduction targets beyond the London Plan 2021; and</li> <li>• Introducing a higher cost of carbon than the London Plan 2021.</li> </ul> <p>CC2.3 - This policy aims to minimise energy use and carbon emissions through energy efficiency improvements and drive a fabric first approach, by:</p> <ul style="list-style-type: none"> <li>• Applying the Mayor’s energy efficiency targets to all development resulting in the creation of 1 or more dwellings or 500sqm non-residential GIA.</li> <li>• Introducing fabric energy efficiency standards for new build development.</li> <li>• Introducing Energy Use Intensity as a new metric for measuring performance; and</li> <li>• Requiring increased disclosure of anticipated energy demand and post-occupancy monitoring for major schemes.</li> </ul> <p>CC2.4 - This policy aims to drive the decarbonisation of heat and maximise renewable energy generation in the borough, by:</p> <ul style="list-style-type: none"> <li>• Requiring developers to use efficient low carbon heat and to maximise renewable energy generation on site; and</li> <li>• Banning gas boilers in new dwellings and new non-residential development from January 2023.</li> </ul> <p>CC2.5 - This policy aims to minimise waste and embodied carbon, and promote a circular economy, by:</p> <ul style="list-style-type: none"> <li>• Requiring all development resulting in the creation of 30 or more dwellings or 1,000sqm or more non-residential GIA, and proposals proposing to demolish and rebuild a single dwelling, to carry out a Whole-Life Cycle Carbon Assessment.</li> </ul> <p>CC2.6 - This policy aims to drive higher sustainability standards, by:</p> <ul style="list-style-type: none"> <li>• Requiring BREEAM (Building Research Establishment Environmental Assessment Method) ‘Excellent’ standards for conversions or change of use resulting in the creation of 10 or more new dwellings, and all new build and change of use non-residential development of 1,000sqm GIA or more.</li> </ul>				
	Are there any specific policies in	-2	-1	0	+1	+2

12.	the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan or a plan produced by a Combined Authority or through voluntary agreement).	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> the Mayor of London has clarified that Merton's Local Plan will be in general conformity with the Mayor's London Plan subject to the adoption of modifications on tall buildings to provide maps and clarify building height ranges (retaining the same locations as proposed at Reg19 stage, just providing more detail on height ranges and maps for locations)				
		<b>Implications of taking no further action:</b> If the modifications were not made then the Mayor of London would consider Merton's Local Plan not to be in general conformity with the Mayor local plan				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> none.				
		<b>Reviewer Comments:</b> Modifications have been recommended to Merton's Reg19 Local Plan to achieve general conformity with the Mayor's London Plan				
13.	<p>Is the local plan policies update?</p> <ul style="list-style-type: none"> <li>in conformity with any 'higher level' plans prepared by the Council; and</li> <li>properly reflecting provisions of any made neighbourhood plan?</li> </ul>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> The Local Plan is in conformity with other council plans including Merton's Community Plan (0D31)				
		Currently there are no made neighbourhoods plan in Merton.				
		<b>Implications of taking no further action:</b> None.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None.				
		<b>Reviewer Comments:</b> None				
		-2	-1	0	+1	+2



14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> A comprehensive Consultation Statement (0D8) has been prepared that demonstrates compliance with the Town and Country (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement 2020 (0D33) and revisions to the Statement of Community Involvement during COVID-19 pandemic (2020) (0D34).				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move score to right:</b> None				
<b>Reviewer Comments:</b> A Consultation Statement (0D8) has been produced which demonstrates that the Council is in compliance with the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement.						
15. The	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	-2	-1	0	<b>+1</b>	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> The SA/SEA scoping report identified the issues in Merton in the context of environmental, social and economic. It examined the strategic alternatives. This In turn influence and help identify growth areas and the policy direction of the plan.  The local plan was assessed against the objectives would be, used to assess the Local Plan. The SA assessed the Local Plan at each stage using the SA decision framework, assessing the evidence/research. The submission SA (including the proposed modifications) set out the reasonable alternatives not taken forward. Through this process, we ensured that the policies constituted a positive and appropriate framework for the delivery of the objectives				
		<b>Implications of taking no further action:</b> None.				

		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> The scope for alternative is limited; the Local Plan is required to be in conformity with the London Plan. The London Plan (2021) was subject to a SA.				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> The SA report covers these matters and received comments from the statutory bodies in general supporting the assessment of the policies and proposals.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A				
		<b>Reviewer Comments:</b> The SA report (D5 and D5) sets out the assessment for Local Plan policies, site allocations and land designations. It uses an SA objectives framework that was, developed as part of the scoping report process (D18). The effects of the plan were, assessed and likely effects were, taken into account when carrying out the assessments, along with cumulative effects.				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> The findings of the appraisal has influence to help, define the most sustainable polices. 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 proposal.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				

		<b>Reviewer Comments:</b>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement ✓	<b>Yes, we are confident our plan will meet this requirement</b>
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	<b>Reason for score:</b> The Council carried out an Equality and Diversity Impact Assessment (0D10). It assessed the effects of the Local Plan on the Protected Characteristics.				
		<b>Implications of taking no further action:</b> None.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None.				
		<b>Reviewer Comments:</b> Merton's Equality Impact Assessment (0D10) considered the impact of the Local Plan on the Protected Characteristics as identified in the Equality Act 2010. The overall impact was positive and thus no direct action needed.				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement ✓</b>
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	<b>Reason for score:</b> The Habitats Regulations Assessment (0D12) considers the impact of the draft Local Plan in combination with other plans and project including neighbouring boroughs.				
		<b>Implications of taking no further action:</b> none.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> It is clear that it has considered the in-combination effects of neighbouring Local Plans, housing deliver and transport projects, and other development relating to economic growth and environmental management within in Merton, neighbouring boroughs and beyond within Natural England agreed catchment area for the HRA (0D12). The council consulted Natural England who were supportive of the findings of the HRA.				
		-2	-1	0	+1	+2

20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> The HRA (0D12) screens out the need for a Full HRA (or Appropriate Assessment) and does not identify any mitigation measures.				
		<b>Implications of taking no further action:</b> None.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None.				
		<b>Reviewer Comments:</b> n/a				
21	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> The HRA concludes that the Local Plan would not adversely affect the integrity of the European sites, either alone or in combination with other plans and projects. It found it would not have ' <i>no significant effect</i> ' on the European sites				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None.				
		<b>Reviewer Comments:</b> none.				
<b>Housing Strategy</b>						
22	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓

	<p>as a minimum? If not [<i>for instance, because another local authority has agreed to plan for your unmet need</i>], can you explain and robustly justify why?</p>	<p><b>Reason for score:</b> The Local Plan demonstrates how the policies meet our housing requirement in full and that this can be, achieved as a minimum. Chapter 11 (Housing Provision) includes Merton’s Housing Trajectory, which demonstrates that we have the housing capacity required and how the housing requirement will be delivered over the plan period. Policy H11.2 states a sufficient supply of land to meet the housing requirement in full over the plan period. This is supported by evidence including Merton’s Housing delivery test action plan (11D10) and Merton’s housing annual position statement (11D11).</p> <p><b>Implications of taking no further action for local plan soundness and/or effectiveness:</b> None</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> None</p> <p><b>Reviewer Comments:</b> The housing policies in the Local Plan are supported by robust evidence and clearly shows how the Council will meet it housing requirement set by the Mayor; in accordance with NPPF and the London Plan.</p>				
G	<p><i>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</i></p>	<p>In March 2021 Mole Valley Council wrote to Merton Council and other councils requesting if other councils could accommodate their unmet needs of approximately 1,700 homes over their 15 year plan period from 2020-2025. In April 2021, Merton responded to Mole Valley Council that we would not be able to accommodate their unmet need.</p>				
23	<p>Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?</p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 <b>Unclear whether our plan meets this requirement or not</b>	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score:</b> No. In April 2021 Merton responded to Mole Valley Council that we would not be able to accommodate their unmet need.</p> <p><b>Implications of taking no further action:</b> Not applicable</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> Not applicable</p>				

		<b>Reviewer Comments:</b> n/a				
		-2	-1	0	+1	+2
24.	<p>Is there a housing trajectory, which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?</p> <p>Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<p><b>Reason for score:</b> Chapter 11 (Housing Provision) includes a housing trajectory illustrating the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period. In accordance with the London Plan and in collaboration and agreement with the Mayor, the housing trajectory set out in the London Plan sets a realistic stepped delivery target over a ten-year period. This is in recognition of the significant increase in housing delivery required by the London Plan targets for boroughs, the London Plan states at paragraph 4.1.10 that these can be, achieved gradually and encourages boroughs to set realistic and where appropriate stepped housing delivery target.</p> <p>Merton's strategy for delivery and implementation is clearly articulated and justified to support the housing trajectory in the Local Plan, particularly within Chapter 11 (Housing Provision). This is supported by evidence including Merton's Housing delivery test action plan (11D10) and Merton's housing annual position statement (11D11), Merton's housing delivery study (11D6), Merton's draft housing delivery strategy (11D12)</p>				
		<p><b>Implications of taking no further action:</b> None</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> Monitoring AMR</p>				
		<p><b>Reviewer Comments:</b> Merton's Annual Position Statement and Housing Delivery Test Action Plan will assist in outlining the strategy for maintaining a deliverable supply of housing land throughout the Plan period. The council has also consulted on a draft Housing Delivery Strategy (11D12) to set the council's ambition and intentions regarding the delivery of new homes.</p>				
		-2	-1	0	+1	+2

25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5-year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> Yes, Merton's housing trajectory set out in Chapter 11 of the local plan, and Authority Monitoring Report and Annual Position Statement (11D11), confirm (i) a 5-year supply of specific deliverable sites on adoption and (ii) developable sites beyond the initial 5-year period providing significant supply going forward for the remainder of the plan period. (iii). Merton has performed well in terms of the Housing Delivery Test to date and is not subject to the 20% buffer. Merton has identified sufficient sites in the five-year supply to include a 10% buffer against the proposed Local Plan target for those years. Overall, Merton has identified sites with capacity to deliver 118% of the local housing requirement for the Local Plan period. This gives greater confidence that sites should be available to deliver, subject to the market being able to support sustained delivery.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> Merton's Annual Position Statement (11D11) and Housing Delivery Test Action Plan (11D10) will assist in outlining the strategy for maintaining a deliverable supply of housing land throughout the Plan period. The council has also consulted on a draft housing delivery strategy in autumn 2021 (11D12) to set the council's ambition and intentions regarding the delivery of new homes. The council has developed other initiatives such as the Small Sites Toolkit SPD (12D2), allocating sites of all sizes in the Local Plan including small sites and has explored the opportunities for and barriers to housing delivery in Merton's Housing Delivery Study 2020 (11D6).				
26.	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> Merton's Local Plan housing trajectory and Authority Monitoring Report (0D28) and Annual Position Statement (11D11) demonstrate that Merton has				

	<p>the full requirement will be met during the plan period?</p>	<p>identified sufficient sites in the five-year supply to include a 10% buffer against the proposed Local Plan target for those years. Overall, Merton has identified sites with capacity to deliver 118% of the local housing requirement for the Local Plan period. This gives greater confidence that sites should be available to deliver, subject to the market being able to support sustained delivery. The council will monitor supply performance via the Authority Monitoring Report and where appropriate deploy the interventions and actions set out in Merton’s Housing Delivery Test Action Plan (11D10) should failure of the Housing Delivery Test occur.</p> <p><b>Implications of taking no further action:</b> The council is already taking related actions, such as developing the housing delivery strategy and action plan, for which public consultation finished in October 2021.</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> None</p> <p><b>Reviewer Comments:</b> the wide range of different types of housing supply in Merton – from small sites to estate regeneration - is being supported by an equivalent range of council and partner projects which gives greater resilience for housing delivery</p>				
<p>27.</p>	<p>Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?</p>	<p>-2</p> <p>No, we do not meet this requirement</p>	<p>-1</p> <p>No, we may not fully meet this requirement</p>	<p>0</p> <p>Unclear whether our plan meets this requirement or not</p>	<p>+1</p> <p>Yes, we are likely to meet this requirement</p>	<p>+2</p> <p><b>Yes, we are confident our plan will meet this requirement</b> ✓</p>
		<p><b>Reason for score:</b> In accordance with NPPF paragraph 70, small sites windfalls are included and relied upon during the plan period. The EIP Inspector’s Report for the London Plan (11D5), states in para 174 and PR9 that small sites can be taken as a reliable source of supply and provides the compelling evidence required for the purposes of para 70 of the NPPF as an expected future trend. A modelled small site assumption of 261 new homes per year has been added to the identified sites in Merton’s Housing Trajectory from 2023/2024 in accordance with the implementation, of the new London Plan target, as set out in Para 174 of the Examination in public (EIP) Inspector’s Report. Sites in the trajectory where the site area is less than 0.25ha have been removed from the windfall assumption from 2023/2024 onwards to avoid double counting (as per paragraph 174 of the EIP Inspector’s report into the London Plan). Yes, there is compelling evidence that windfall sites will continue to come forward.</p>				



		<p>Merton is a borough of small sites and historically delivers more than 261 new homes each year on sites of less than 0.25ha. For example:</p> <ul style="list-style-type: none"> <li>• in FY18-19, 272 new homes were built on sites of less than 0.25ha;</li> <li>• in FY19-20, 283 new homes were built on sites of less than 0.25ha;</li> <li>• In FY20-21, 302 new homes were built on sites of less than 0.25ha.</li> </ul> <p>Therefore, it is a reasonable and conservative approach, supported by evidence to use the London Plan windfall assumption of 261 new homes built, per year on small sites in Merton's 15-year housing trajectory.</p>				
		<p><b>Implications of taking no further action:</b> None</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> The council has adopted planning guidance including Merton's Borough Character Study SPD (12D1) and Merton's Small Sites toolkit SPD (12D1) to support the delivery of all site and particularly small sites given the characteristics of land ownership and development in Merton.</p>				
		<p><b>Reviewer Comments:</b> This position is, evidenced through previous Authority Monitoring Reports. Delivery will be, monitored through successive annual authority monitoring reports. Carrying out the actions in the council's emerging Housing Delivery Strategy and action plan (11D12) should also help support delivery.</p>				
28.	Does the local plan policies update, make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<p><b>Reason for score:</b> Chapter 11 (Housing Provision) Policies H11.1; 11.2;11.3;11.4;11.5;11.6 and 11.7 make it clear what size type and tenure of housing is required</p>				
		<p><b>Implications of taking no further action:</b> None</p>				

		<b>Mitigation / Action required (if necessary) to move scale to right: N/A</b>				
		<b>Reviewer Comments:</b> none.				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> Chapter 11 of the Local Plan has a range of policies, which seek to address the needs of different groups in the community. This includes policy H11.4 that sets out the requirements concerning the provision of supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system. Policy H11.5 seeks, subject to identified need to deliver student housing, other housing with shared facilities and bedsits. Policy H11.6 addresses provision of accommodation for Gypsies and Travellers.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> none				
30.	Can your affordable housing requirements, including any geographical variations, be justified?	-2	-1	0	+1	+2
	Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?	<b>No, we do not meet this requirement</b> (for the delivery of the full affordable housing need)	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓ (for justifying the affordable housing requirements)

	<p><b>Reason for score:</b> The strategic affordable housing policies for London Boroughs are, set out within the Mayor’s new London Plan (0D32). Where the London Plan allows boroughs to address local circumstances, the Local Plan provides policies to cover these matters. The overwhelming need, as outlined within Merton’s Strategic Housing Needs Assessment (11D8) is for genuinely affordable housing products, such as low cost rent (e.g. social rent). Therefore, the discretionary 40% for affordable housing tenure, to be decided as set out in the London Plan by London boroughs has, been allocated to this. These requirements are set out within Local Plan policy H11.1 that refers to the London Plan threshold approach. Its ability to be, provided along with other policy requirements within the Local Plan are, supported and justified by Merton’s Local Plan Housing Viability Study (11D7). It should be noted that Merton’s Local Plan proposes a policy to seek contributions from small sites towards affordable housing, in recognition of the challenges of affordable housing delivery in a borough that is characterised by fragmented land ownership and high land values (i.e. small sites). The need for affordable housing in Merton, and London is substantial and is, identified at over 1,000 homes per year, for low cost home ownership in Merton’s SHNA (11D8). It is not feasible to meet this requirement over the Local Plan period. National policy requires that affordable housing requirements be realistic, with particular regard to viability. In accordance with the new London Plan (0D32), and Merton’s Housing Viability Study (11D7), the final proposed requirements have been arrived at as set out in Policy H11.1, including the proposal to seek contributions from small sites. Although these are ambitious, they still do not meet the objectively assessed need. This strikes a balance between ensuring viability and therefore delivery, and enabling a significant proportion of our affordable housing need to be, met.</p> <p><b>Implications of taking no further action:</b> The council will continue to optimise affordable housing growth</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> the council will seek contributions from all types of sites, including small sites of less than 10 homes, towards affordable housing</p> <p><b>Reviewer Comments:</b> The council can justify the affordable housing requirements in the Local Plan and has proposed policies that seek affordable housing contributions from both larger and smaller sites in recognition of the characteristics of development locally and the difficulties in meeting affordable housing needs. However, this will not result in</p>
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		delivering enough affordable homes to meet objectively assessed need and viability remains a consideration in developers' appetite to build homes.				
31.	<p>Have the needs for travellers and travelling show people been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> The needs for travellers and travelling show people has been adequately assessed in accordance with national policy and has been based on robust evidence set out within Merton's Gypsies and Traveller Accommodation Assessment (GTAA) 2019 (11D9). Policy H11.6 informed and supported by Merton's GTAA (11D13) makes adequate provision for the identified needs.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A				
<b>Reviewer Comments:</b> None						
32.	<p>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling show people pitches to meet identified needs?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b> ✓
		<b>Reason for score:</b> Merton's 2019 GTAA Study (11D9), identified that Gypsies and Travellers identified needs were zero pitches for each five year period for the lifetime of the plan. Based on the national planning policy requirements (Planning Policy for Traveller Sites 2015) (11D13), or 6 pitches in the first five years based on the then 2017 Draft London Plan definition (DLP).				
		The main drivers of need, based upon the then 2017 Draft London Plan definition (DLP), were from 'hidden' (or 'concealed' families) and psychological aversion of households living in bricks and mortar accommodation resulting in the need for 6 pitches within the first five years.				

		<p>However based on national policy, the accommodation need arising over the first five years and the entire 15 years is all counterbalanced by additional supply emerging over the 15 years (such as vacant pitches and pitches becoming vacant over time on the traveller site in Merton).</p> <p>Since the 2019 Study was completed, the London Plan was, published in March 2021. The Examination in Public Inspector's report recommended, that the definition of Gypsies and Travellers should be consistent with national policy (2015 Planning and Policy for Travellers Sites – PPTS) (11D13). The 2021 London Plan (00D32) reflects the Examination in Public Inspector's recommendation. As a result, the implications for the 2019 Study findings is based on national policy which demonstrates that needs can be met from existing supply and does not identify further needs within the first 5 years or 15 year Local Plan period.</p> <p><b>Implications of taking no further action:</b> None</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A</p> <p><b>Reviewer Comments:</b> Merton has an up to date Gypsies and Travellers Accommodation Needs Assessment 2019 (11D9) and although zero additional pitches are required, Merton's Local Plan policy H11.6 sets out the policy provision should circumstances change.</p>				
H	<i>List any travellers and travelling show people sites identified to meet need and the timescales for their delivery</i>	<i>N/A (please refer to answer to question 32 above)</i>				
Justified approaches to plan policy and content						
33.	Where thresholds are set in policies, which trigger specific policy requirements, are these	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet</b>

	<p>thresholds justified by evidence and is this clear in the supporting text?</p> <p>[You may wish to check each policy setting a threshold]</p>			<p>requirement or not</p>		<p><b>this requirement</b></p>
	<p><b>Reason for score:</b> The following policies set thresholds, and these are justified by evidence and this is clear in the local plan supporting text.</p> <p>Policy CC2.2 Minimising Greenhouse Gas emissions – thresholds justified by evidence which is clear in the supporting text.</p> <p>Policy CC2.3 Minimising energy use - thresholds justified by evidence which is clear in the supporting text.</p> <p>Policy CC2.5 minimising waste and promoting a circular economy - thresholds justified by evidence which is clear in the supporting text.</p> <p>Policy CC2.6 sustainable design standards – thresholds justified by evidence, which is clear in the supporting text.</p> <p>Policy D12.3 ensuring high quality design for all developments – thresholds justified by evidence which is clear in the supporting text.</p> <p>Policy D12.6 as modified (0D4) tall buildings – thresholds justified by evidence which is clear in the supporting text</p> <p>Policy D12.10 Dwelling conversions - thresholds justified by evidence which is clear in the supporting text.</p> <p>Policy D12.11 Basement and subterranean design - thresholds justified by evidence which is clear in the supporting text.</p> <p>Policy EC13.2 – business locations in Merton - thresholds justified by evidence which is clear in the supporting text.</p> <p>Policy EC13.3 protection of scattered employment sites - thresholds justified by evidence which is clear in the supporting text.</p> <p>TC13.5 Merton’s town centres and neighbourhood parades - thresholds justified by evidence which is clear in the supporting text.</p> <p>TC13.6 Development of town centre type uses outside town centres - thresholds justified by evidence, which is clear in the supporting text.</p> <p>TC13.7 Protecting corner / local shops - thresholds justified by evidence, which is clear in the supporting text.</p> <p>TC13.8 Food and drink / leisure and entertainment - thresholds justified by evidence which is clear in the supporting text.</p>					

	<p>TC13.9 Culture, arts and tourism development - thresholds justified by evidence, which is clear in the supporting text.</p> <p>O15.5 Urban greening - thresholds justified by evidence, which is clear in the supporting text.</p> <p>F15.8 Managing local flooding - thresholds justified by evidence which is clear in the supporting text.</p> <p>P15.10 Improving air quality and minimising pollution - thresholds justified by evidence, which is clear in the supporting text.</p> <p>H11.1 Housing Choice - thresholds justified by evidence, which is clear in the supporting text.</p> <p>H11.2 housing provision - thresholds justified by evidence, which is clear in the supporting text.</p> <p>H11.3 housing mix - thresholds justified by evidence, which is clear in the supporting text.</p> <p>H11.5 Student housing, other housing with shared facilities and bedsits - thresholds justified by evidence, which is clear in the supporting text.</p> <p>IN14.2 Social and community infrastructure - thresholds justified by evidence, which is clear in the supporting text.</p> <p>IN14.3 Sport and recreation - thresholds justified by evidence which is clear in the supporting text.</p> <p>T16.2 Prioritising active travel choices - thresholds justified by evidence, which is clear in the supporting text.</p> <p>T16.4 Parking and low emission vehicles - thresholds justified by evidence which is clear in the supporting text.</p>				
	<b>Implications of taking no further action:</b> None				
	<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
	<b>Reviewer Comments:</b> A review of the policies in the local plan demonstrates, that thresholds are clearly, explained and justified by evidence, that the explanation and reference to the evidence is, provided in the supporting text and that the examination library contains the evidence referred to in the supporting text.				
	-2	-1	0	+1	+2

34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be, covered in, other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> The only policy that defers matters to other documents is Strategic Policy W14.4 Waste management. This is because the four boroughs of Croydon, Kingston, Merton and Sutton produce a joint DPD South London Waste Plan to inform planning applications for waste transfer and management in Merton. The original South London Waste Plan joint DPD was adopted in 2012 (14D2); revised 2018-2021, submitted to the Secretary of State in January 2021 with public hearings in September 2021 (due to be adopted late 2021 or early 2022 by the four boroughs subject to a successful examination) (14D1). Once adopted, the joint DPD will set another long-term strategy and development management policies for delivering waste proposals.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> None				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Hierarchies are defined in the following policies: D12.5 managing heritage assets (for nationally or locally listed heritage assets, buildings parks and gardens) EC13.2 business locations in Merton (for strategic industrial locations and locally significant industrial sites and scattered employment sites and offices TC13.5 Merton's town centres and neighbourhood parades (for the hierarchy of major, district and local centres and neighbourhood parades)				



	<p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail settlements.]</p>	<p>O15.2 Open space and green infrastructure (MOL, designated open space, green corridors etc. F15.8 managing local flood risk (fluvial flood risk zones)</p> <p>All of the above policies make clear their policy level relative to their status within the hierarchy and are consistent with national policy and the London Plan</p>														
<p><b>Implications of taking no further action:</b> none</p>		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A</p>														
<p><b>Reviewer Comments:</b> none</p>		<table border="1"> <thead> <tr> <th data-bbox="907 550 1167 587">-2</th> <th data-bbox="1167 550 1426 587">-1</th> <th data-bbox="1426 550 1686 587">0</th> <th data-bbox="1686 550 1946 587">+1</th> <th data-bbox="1946 550 2204 587">+2</th> </tr> </thead> <tbody> <tr> <td data-bbox="907 587 1167 774">No, we do not meet this requirement</td> <td data-bbox="1167 587 1426 774">No, we may not fully meet this requirement</td> <td data-bbox="1426 587 1686 774">Unclear whether our plan meets this requirement or not</td> <td data-bbox="1686 587 1946 774"><b>Yes, we are likely to meet this requirement</b></td> <td data-bbox="1946 587 2204 774">Yes, we are confident our plan will meet this requirement</td> </tr> </tbody> </table>					-2	-1	0	+1	+2	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement
-2	-1	0	+1	+2												
No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement												
<p>36.</p>	<p>Where policies seek to limit certain uses is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	<p><b>Reason for score:</b>            EC13.2 (business locations in Merton) seeks to promote industrial uses in Strategic Industrial Locations and Locally Significant Industrial Areas and limit uses that would compromise the function and ability of the designated industrial area to operate as a 24 hour business location            EC13.3 (protection of scattered employment sites) aims to protect scattered employment sites for business, jobs or community uses where these are in demand.</p> <p>The following policies aims, to promote town centre type uses within a hierarchy of town centres and neighbourhood parades and limit out of centre retail development or development that has a high footfall to town centres or areas of high PTAL:            TC13.5 (Merton’s town centres and neighbourhood parades),            TC13.6 (development of town centre type uses outside town centres            TC 13.9 (culture, arts and tourism development)</p>														

		<p>TC13.7 (protecting corner / local shops) aims to support residents being within walking distance of food and basic services by limiting the change of use of local shops if there are no other premises in the area</p> <p>F15.8 (managing local flood risk) aims to limit developments that are most at risk of flooding to the lowest locations for flood risk</p> <p><b>Implications of taking no further action:</b> none</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A</p> <p><b>Reviewer Comments:</b> The limitations help the Local Plan to deliver the requirements of the NPPF 2021 (for example to plan for viable and vital town centres). Some representations challenge these limits (for example proposing retail development out of centre or in a strategic industrial location)</p>				
<p>37.</p>	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<p><b>Reason for score:</b> Yes, where policies propose standards, these are justified and deliverable, taking into account the scale of development. Merton's Local Plan viability Study (11D7) tested the draft policies including provision for the application of standards (e.g. those set out in Merton's draft climate change policies, car-parking policies etc) and concluded that Merton's policies were generally viable over the lifetime of the local plan.</p>				
		<p><b>Implications of taking no further action:</b> none</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A</p> <p><b>Reviewer Comments:</b> It should be noted that, like many London boroughs, many of the standards in Merton's draft planning policies are derived from the London Plan 2021 (0D32), (for example, internal space standards for new dwellings, car parking standards, cycle parking standards, electric vehicle charging points standards, play space requirements etc) which has itself been subject to viability testing.</p>				

Deliverability						
		-2	-1	0	+1	+2
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Merton's housing viability study 2020 (11D7) thoroughly, tested residential viability, including proposals for mixed use, proposals with different size and tenure types, considering provisions for infrastructure provision, play space, bike stores and other ancillary land take, Merton's and the Mayor of London's CIL, the costs of reaching the new proposed climate change initiatives and the proposed affordable housing targets for both large sites and small sites.				
		<b>Implications of taking no further action:</b> Policies for the provision of affordable housing (H11.1) remain subject to site circumstances, which include economics of provision. This allows development to be flexible to unexpected costs and changes in circumstances that may only come to light at the planning application stage				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A				
		<b>Reviewer Comments:</b> Merton's housing viability study demonstrates that the Local Plan is viable, including testing mixed use development.				
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?  Is it clear the viability and delivery of development will not be, put at risk by the requirements in the local plan policies update?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> As above, Merton's policies reflect the conclusions of Merton's housing viability study 2020 (11D7). It is clear that viability and delivery of development will not be, put at risk by the requirements in the new Local Plan.				
		<b>Implications of taking no further action:</b> N/A				

		<b>Mitigation / Action required (if necessary) to move scale to right: N/A</b>				
		<b>Reviewer Comments:</b> None				
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score:</b> The sustainability appraisal (0D2) accompanying the Local Plan contains a monitoring framework (figure 10) which sets out the objectives, indicator timeframe and who it is monitored by Merton's authority monitoring reports (0D28) over successive years extensively monitor existing local plan policies covering all the topics within the emerging local plan. Together with all other London boroughs, the council contributes to the London Development Database. It records every residential planning permission (and others that affect strategic matters) including the number, type and tenure of homes, build, any loss of open space or garden land, transport infrastructure and cycle parking and a myriad of data that is used to monitor each borough's Local Plan and the London Plan. This monitoring data also contributes to the London Datastore and within it, the Planning London Datahub <a href="https://data.london.gov.uk/dataset/planning-london-datahub">https://data.london.gov.uk/dataset/planning-london-datahub</a> of open source data on development trends in each borough and across London. The council also updates the five year housing land supply, thoroughly assess housing delivery, conducts shopping surveys of towns, local centres and neighbourhood parades, works with other boroughs in the South London Waste Plan on waste plan monitoring, provides an Infrastructure Funding Statement (18D2) to monitor the delivery of CIL and section 106 towards infrastructure. The authority monitoring reports also comply with Regulation 34 of the 2012 Regulations in monitoring the delivery of the Local Development Scheme, neighbourhood planning etc. However although monitoring is contained in the Sustainability appraisal and the authority monitoring report it isn't contained within this Local Plan document.</p>				
		<b>Implications of taking no further action:</b> none				

		<b>Mitigation / Action required (if necessary) to move scale to right:</b> Cross check to see if the existing extensive monitoring regime captures all new policies.				
		<b>Reviewer Comments:</b> the council should provide a table in the next AMR to clarify how the monitoring framework in the sustainability appraisal will monitor the all of the new local plan policies in the future.				
41.	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u> ?  Where triggers for plan review and/or update are identified are they justified and proportionate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	<b>Unclear whether our plan meets this requirement or not</b>	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> There is a legal requirement to review Local Plans every five years. It seems unlikely that a trigger could be developed to require a review sooner than every five years due to the time it takes to establish development trends.				
		<b>Implications of taking no further action:</b> The performance of the policies will be monitored in the authority monitoring report (0D28). Should Merton's new local plan be adopted the AMR will continue to review policies, sites and the other requirements of Regulation 34 annually and Merton will continue to use the London Development Database to feed into the London Plan's annual review. However it is unclear whether Local Plans need to be reviewed more frequently than every five years on the basis of findings from the AMR. Development trends take approximately three years to establish so a Local Plan review within each five year period seems reasonable and appropriate.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> Assess whether there are scenarios which might necessitate a local plan review more than once within five years.				
		<b>Reviewer Comments:</b> The requirement to review a Local Plan within every five years will be based on the results of monitoring and whether policies are performin				
<b>Plan effectiveness (and associated policy clarity)</b>						
		-2	-1	0	+1	+2

42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u> ? Does the evidence relied on to support those policies correspond/cover this whole period?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement √
		<b>Reason for score:</b> Yes. The local plan policies update is clear which policies are strategic. In London, the London Plan (0D32) is also part of the statutory development plan and provides several strategic policies; these will have a different timeframe to Merton's Local Plan as the London Plan was, published, already in March 2021. The substantial amount of evidence relied upon covers the Plan period, however it is recommended that any future local plan review (required within five years of adoption) should update this evidence as the further from its creation, the less reliable it will be (particularly for years 11-15 of the Plan period)				
		<b>Implications of taking no further action:</b> If evidence was not reviewed alongside future Local Plans, new policies would not be justified				
		<b>Mitigation / Action required (if necessary) to move scale to right</b> Review Merton's local plan within five years of adoption				
		<b>Reviewer Comments:</b> The London Plan 2021 (0D32) and Merton's Local Plan are both part of the statutory development plan in Merton although they cover different timeframes. Local Plans should be, reviewed within five years of adoption.				
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Yes, The introduction chapter states the Plan will be replacing the Core Planning Strategy (2011), Sites and Policies Plan (2014) and the Policies Map (2014) and was clearly outlined/stated at each public consultation stage.				
		<b>Implications of taking no further action:</b> n/a				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a				
<b>Reviewer Comments:</b> none.						

44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Yes, the plan's objectives are clear and the policies can be easily, used and understood for decision-making. The council's development management team contributed to the drafting of the local plan policies.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> none				
<b>Reviewer Comments:</b> None						
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map?  Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> The council has also submitted a Policies Map (0D1) that clearly defines the policy areas. The glossary at the back of the Local Plan assists with consistency between terminology in policies and on the Policies Map				
		The Mayor of London's response at Regulation 19 (stage 3) required maps and diagrams relating to taller buildings to be included in the Local Plan to give greater clarity to Policy D12.6 Tall Buildings and bring the Local Plan into general conformity with the London Plan (0D32). While we are confident that this modification is clear it has not been subject to public consultation				
		<b>Implications of taking no further action:</b>				
<b>Mitigation / Action required (if necessary) to move scale to right:</b> Public consultation on all modifications following the public hearings						
<b>Reviewer Comments:</b> It may be necessary to consult on the Local Plan containing all modifications arising between Reg 19 / Stage 3 publication and the examination process.						

46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Yes, policies are phrased positively and make clear the types of development that will be acceptable				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A				
<b>Reviewer</b>						
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.  [Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Yes, policies make clear where they are intending to be, applied differently for the purposes of decision-making. For example, the policies listed in Question 33 above that contain thresholds are clear how these are applied. The policies that relate within town centre boundaries, strategic industrial locations, and flood risk areas for example are clear from the policy text, the glossary, the Policies Map where these apply, and the scale and land use to which they apply.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b> none						
I	<i>State how many policies are in your local plan update?</i>	There are 61 policies in Merton’s emerging Local Plan.  Yes, there are policies that cross-reference each other:				



	<p><i>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</i></p>	<ul style="list-style-type: none"> <li>- Health and wellbeing cross references food and drink / leisure and entertainment (on hot food takeaways)</li> <li>- Urban design references car and cycle parking standards, low carbon power, open spaces, trees, wheelchair accessible housing and other design features</li> <li>- Policies on the protection of Metropolitan Open Land and open space reflect the London Plan 2021 and the NPPF.</li> </ul> <p>We are aware of where this happens and, we have tried to keep it to a minimum and been clear about the hierarchy (i.e. only having the actual policy requirement in one place, and simply referring to it in the second policy). Although, plans should be, read as a whole and the London Plan is part of the statutory development plan for the borough too, occasional careful cross-referencing is necessary. In some cases, it has been, added in response to public consultation feedback to make the plan clearer.</p>				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<p><b>Reason for score:</b> We are aware of where this happens. We have tried to keep it to a minimum and been clear about the hierarchy (i.e. only having the actual policy requirement in one place and simply referring to it in the second policy). Although plans should be read as a whole and the London Plan is part of the statutory development plan</p>				

	consider whether this is appropriate.	for the borough too, occasional careful cross-referencing is necessary. In some cases, it has been, added in response to public consultation feedback to make the plan clearer.				
		<b>Implications of taking no further action: none</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: n/a</b>				
		<b>Reviewer Comments:</b> The plan strikes a balance between repetition and clarity				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	-2	-1	0	+1	<b>+2</b>
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> In some cases, policies refer to Building Regulations. For example, policy H11.1 housing choice refers to the London Plan and building regulations requirements for wheelchair accessible housing. Policy CC2.1 in the supporting text makes extensive reference to building regulations to explain the significant gap between the current Building Regulations Part L 2013 standards and the standards required to become net zero by 2050. Policy CC2.3 sets thresholds of 10% above building regulations to make it straightforward for the applicant to understand and implement.				
		<b>Implications of taking no further action: none</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: N/A</b>				
		<b>Reviewer Comments:</b> This approach does not duplicate regulatory requirements				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?  [For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the	-2	-1	0	+1	<b>+2</b>
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	<b>Yes, we are confident our plan will meet this requirement</b>
		<b>Reason for score:</b> Overly subjective terms have been avoided. The language through the plan aims to be clear. This has been informed by feedback from public consultation and engagement.				
		<b>Implications of taking no further action: None</b>				

	Council” or “appropriate” without associated clarification.]	<b>Mitigation / Action required (if necessary) to move scale to right: None</b>
		<b>Reviewer Comments: none</b>

Date of assessment:	28 November 2021
Assessed by:	Ann Maria Clarke
Checked by:	Tara Butler
Overall Score:	85
Comments:	