

Sustainability Appraisal (SA) incorporating Strategic Environmental
Assessment (SEA) for the Local Plan
Main Modifications May 2022

Non-technical summary

- i. Following the Matters and Issues Questions (MIQs) raised by the independent Planning Inspector dated April 2022 and as part of the examination process, Merton Council are proposing Main Modifications (MM) to the draft Local Plan to ensure the Plan is sound in accordance with the tests set out in the National Planning Policy Framework paragraph 35.
- ii. The scope of the SA work was introduced within the SA Scoping report published in 2018. Essentially, the scope is reflected in the SA objectives and SA framework and decision-making criteria.
- iii. The NPPF states that assessments should be proportionate and should not repeat policy assessment that has already been undertaken. Wherever possible the local planning authority should consider how the preparation of any assessment would contribute to the plan's evidence base. The process should be started early in the plan making process and key stakeholders should be consulted in identifying the issues that the assessment must cover. The sustainability appraisals for previous stages of Merton's Local Plan are available in the [Local Plan examination library](#).
- iv. The sustainability appraisal should only focus on what '*is needed*' to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is appropriate for the content and level of detail in the Local Plan.

Screening of Proposed Modifications

- v. The council is proposing a number of MMs for soundness to be submitted to the Planning Inspector as part of the examination process. It is necessary to screen the MMs to determine if they significantly affect the findings of the main SA Report and if further appraisal work is therefore required. All of the proposed main modifications were screened to determine if further SA work was required or if they could be screened out from appraisal.

- vi. The proposed changes and detailed findings of the screening including the rationale for why the MM was screened are provided in Appendix A of this SA. Overall, most MMs involve relatively minor changes either to improve clarity or due to recent new evidence and directly to address issues raised by MIQs raised by the Inspector. These have mainly meant adding clarification or enhance readability or more importantly demonstrate that Merton's Local Plan is in general conformity with the London Plan and with the NPPF. MMs made for clarity would be unlikely to give rise to significant effects or affect the overall conclusions. They do not fundamentally alter the direction of the Plan.
- vii. The screening of the proposed MMs found that the MMs would not have a significant effect on the findings of the previous SA work presented in the main SA. This is because the changes do not fundamentally alter the direction of the Plan. The following Modifications were identified that required further consideration in the SA at this stage. These are as follows:
- MM1.1 Extension of the Local Plan period by one year - (*this MM accounts for 24 changes within the Plan*).
 - MM4.3 Site Allocation Mi16 Mitcham Gasworks
 - MM5.2 Site Allocation Mo4, Site deliverability
 - MM9.2a Site Allocation Wi1: Battle Close
 - MM19.1 (new policy) Monitoring and Monitoring framework

Purpose of sustainability appraisal

- viii. This document is the Sustainability Assessment (SA) for Main Modification to the submitted Local Plan. Therefore, this SA is a supplementary document to the previous SA/SEAs.
- ix. SEA Regulations 2004 Schedule 2 (6) states that:
- The likely significant effects on the environment, including short, medium- and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as:*

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

- x. The purpose of Merton's Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating social, economic, and environmental considerations into the preparation of new or revised plans and strategies. It is imperative to begin the SA/SEA at the first stages of plan making to find the key sustainability issues that are affected by the implementation of the plan; it helps with creating development options and assesses any significant effects of the proposed development. SA/SEAs are a valuable tool for developing sound planning policies and development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.
- xi. The sustainability appraisal is a specific requirement for all local plans from the Planning and Compulsory Purchase Act 2004. A sustainability appraisal considers how the principles of sustainable development has been considered in the preparation of a local plan. Strategic environmental assessment (SEA) is required in the European Union by an EU Directive, commonly referred to as the SEA Directive. Its purpose is to assess the effects of certain plans and programmes on the environment. All local plans are considered to potentially, have significant environmental effects.
- xii. Sustainability appraisal and SEA are required by separate legislation, however as there are many crossovers between the two processes they are usually undertaken together. Where, the sustainability appraisal is referred to, this incorporates the requirements of SEA. There are several stages to the sustainability appraisal process, which are set out in Government guidance. The table below shows these stages and indicates how these relate to the different stages of preparing Merton's Local Plan. This Sustainability Appraisal Report accompanies the submission stage of plan, to be submitted to, the Planning Inspectorate for

independent examination. The previously published sustainability appraisal are as follows:

- [Sustainability Appraisal \(SA\) incorporating Strategic Environmental Assessment \(SEA\) for the Local Plan Submission including proposed amendments November 2021 Revised](#) – updated as Document 0D5i.
- [Sustainability appraisal of Merton’s Local Plan stage 3 Reg 19 July 2021 \(0D3\)](#).
- [Stage 2a sustainability appraisal of Merton’s Local Plan November 2020-February 2021 \(0D16\)](#)
- [Sustainability Appraisal incorporating Strategic Environmental Assessment \(SEA\) November 2018 \(Stage 2\) \(part of 0D17\)](#)
- [Sustainability appraisal scoping report of Merton’s Local Plan 2018-2019 \(0D18\)](#).

The SEA processes

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

Main report

1 Introduction

- 1.1. Merton Council submitted the Local Plan to the Planning Inspectorate on 2nd December 2021. As part of the examination process the council is recommending Main Modifications (MMs) be made to the Plan to ensure the plan is sound in accordance with the tests set out in NPPF paragraph 35. The Planning Inspectors are conducting an examination in public to assess whether the Plan is sound; the examination will include a series of public hearings and is likely to take more than six months.

Purpose and structure of this SA Report

- 1.2. The aim of this SA Report is to appraise the Main Modifications for sustainability. This SA Report is structured as follows:
- Section 2: presents the scope of the SA
 - Section 3: explains the method and presents the findings of the screening of proposed modifications
 - Section 4: sets out consideration of alternatives
 - Section 5: sets out an appraisal of the screened in Modifications
 - Section 6: considers mitigation and enhancement.
 - Section 7: discusses the next steps.

2 What's the scope of the SA?

- 2.1. The scope of the SA work with respect to the Merton's Local Plan, is introduced within the SA Report published in 2018. The scope is in keeping with the SA topics and objectives are listed figure 1 below. Figure 2 contains the SA framework including modifications to it that the council has proposed as part of the examination process.

	Figure 1: Sustainability Appraisal objectives	SEA Topic requirements
SO1	Air quality: To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Air Human Health Population
SO2	Biodiversity: To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	Biodiversity Flora Fauna
SO3	Land and soil condition and pollutants: To conserve Merton's geodiversity and protect soils from development and over intensive use.	Soil Landscape Human Health Biodiversity Flora Fauna
SO4	Sustainable land use: To make the best and most efficient use of land to support sustainable patterns and forms of development.	Landscape
SO5	Heritage (including architectural and archaeological heritage): To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Cultural heritage, including architectural and archaeological heritage.
SO6	Flood risk management: To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Water Climate Factors Human health
SO7	Climate change: To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Climate Factors Material assets
SO8	Noise and vibration: To minimise noise, vibration levels and disruption to people and communities.	Human Health
SO9	Water quality: To protect and enhance Merton's water bodies.	Water Human Health Flora Fauna
SO10	Water consumption: Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Water Human

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

	residents existing and future labour market and improves life chances for all, including people with disabilities and Black Asian and Minority Ethnic groups.	Human Health Material assets
SO22	Economic growth: To increase the vitality and viability of existing town centres, local centres and parades To ensure that there is a mixed of business spaces including, affordable spaces in Merton.	Population Human Health Material assets

Figure 2: SA framework and decision-making criteria. (text in red indicate MMs made in SA (OD5))

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

intensive use.	<p>non- designated sites?</p> <ul style="list-style-type: none"> • Will it impact on existing networks of open spaces and create new green spaces? 	
<p>Sustainable land use To make the best and most efficient use of land to support sustainable patterns and forms of development.</p>	<p>Does it make a positive impact? Does it support positive sustainable patterns? Will, it brings disused sites into use, which benefits residents?</p>	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Vacant sites • Derelict sites • Potential options for future land uses.
<p>Heritage (including architectural and archaeological heritage) To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings. <u>through high quality design and protection of open space, valued views and historic assets.</u></p>	<ul style="list-style-type: none"> • Will it affect the significance of heritage assets through direct impacts or impacts on their setting? • Will the design enhance the local character? • Have, opportunities that make a positive contribution to the local character and area been identified? • Will it impact on any potential archaeological remains? • <u>Heritage assets at risk from neglect, decay, inappropriate development and air pollution?</u> • <u>Potential harm to the significance of heritage assets and wider historic environment through inappropriate development?</u> 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Historic Parks and Gardens • Conservation Area(s) • Listed Building(s) • Archaeological Priority Areas • <u>Heritage assets at risk</u>
<p>Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</p>	<ul style="list-style-type: none"> • Will the proposal be affected by flooding, i.e. is it within zone 2, 3a or 3b? • Will it lead to increased surface water flooding? • Will it lead to sewer flooding? • Will it impact or increase the risk of flooding to other people and property? • Will it promote and, include climate change adaptation, measures? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Location within flood zone • Surface water maps • Localised flooding maps, where available

<p>Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</p>	<ul style="list-style-type: none"> • Will it promote and include climate change adaptation, measures? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Noise and vibration To minimise noise, vibration levels and disruption to people and communities.</p>	<ul style="list-style-type: none"> • Will it impact on locations that are sensitive to noise pollution? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses.
<p>Water quality To protect and enhance Merton's water bodies.</p>	<ul style="list-style-type: none"> • Will it impact on water quality? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</p>	<ul style="list-style-type: none"> • Will it impact on water quality? • Will it lead to increased surface water flooding? • Will it lead to sewer flooding? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</p>	<ul style="list-style-type: none"> • Will it increase or decrease public open space deficiency? • Will it lead to loss or degradation of designated spaces such as MOL (Metropolitan Open Land)? • Will it improve connectivity between existing open spaces? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Metropolitan Open Land • Historic Parks and Gardens
<p>Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</p>	<ul style="list-style-type: none"> • Will it increase access to essential services? • Will it assist in improve health and wellbeing? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Area of relative disadvantage • Access to essential services • Public open space deficiency • Town Centre Boundary

		<ul style="list-style-type: none"> Public Right of Way
<p>Energy use To improve energy efficiency in new developments Increase renewable energy supply / provision.</p>	<ul style="list-style-type: none"> Will it improve and reduce energy use? Will it lead to more energy efficient uses? 	<p>Analysis of:</p> <ul style="list-style-type: none"> Existing use and buildings Potential options for future land uses
<p>Health and wellbeing. To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</p>	<ul style="list-style-type: none"> Will it reduce the health inequalities in areas of poor health? Will it improve mental health and wellbeing? 	<p>Analysis of:</p> <ul style="list-style-type: none"> Areas of deprivation and inequalities Potential options for future land uses
<p>Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand</p>	<ul style="list-style-type: none"> Will it increase the number of homes? Will it increase the number of affordable homes? Will it reduce the number of unsuitable/unfit homes? Does it achieve Lifetime Homes Standard and increase accessibility for wheelchair users? 	<ul style="list-style-type: none"> Existing use and buildings Potential options for future land uses Conservation Areas Public Health plans and strategies Wider determinates of health Areas of deprivation
<p>Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.</p>	<ul style="list-style-type: none"> Does it follow Security by Design principles? Will it contribute to a reduction in the actual crime level? Will it contribute to a reduction in the fear of crime? 	<p>Analysis of:</p> <ul style="list-style-type: none"> Areas of deprivation and inequalities Potential options for future land uses

<p>Population demands and growth. To ensure that provision of environmental, social and physical infrastructure - managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.</p>	<ul style="list-style-type: none"> • Will it reduce the levels of socio-economic inequalities? • Will it ensure that developments such as housing and essential services meet demographic demands and growth? • Will it provide sustainable development that will reduce inequalities? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Areas of deprivation and inequalities • Local services/essential services • Predicted population projections. • Public Health England health profiles.
<p>Social inclusion and cohesion To ensure Merton has socially integrated communities which are strong, resilient and inclusive.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? • Will it reduce deprivation? 	<p>Analysis of: Disadvantaged areas/inequality</p>
<p>Design To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed, accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? • Will it reduce the use of the car? • Will it assist in building strong communities? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Disadvantaged areas/inequality • Potential options for future land uses
<p>Local employment To develop and maintain a healthy labour market.</p>	<ul style="list-style-type: none"> • Will it lead to the creation of jobs? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment data from NOMIS • Employment use • Disadvantaged areas/inequality

<p>Education and skills To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black and Asian Ethnic groups.</p>	<ul style="list-style-type: none"> • Will it impact on the local economy? • Will it lead to local economic growth? • Does it provide jobs? • Will it increase employment opportunities? • Will it increase training and skilled employment? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment use • Disadvantaged areas/inequality
<p>Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.</p>	<ul style="list-style-type: none"> • Will it improve business development? • Will it impact on the local economy? • Will it lead to local economic growth? • Does it provide jobs? • Will it meet local business needs? • Will the site/land use include commercial development? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment use • Town Centre Boundary • Area of Mixed Use

3 Screening of Proposed Modifications

Method

- 3.1. All the proposed MMs were screened to determine if further SA work was required or if they could be screened out from appraisal. The findings of the screening including the rationale for why a MM was screened in or out are provided in Appendix A. Most modifications involve minor edits to the Plan text for clarification, factual correction, to enhance readability or other reasons and have therefore been screened out as not being significant in terms of the SA, i.e. they would be inherently unlikely to give rise to significant effects.

Screening Findings

- 3.2. The screening of the proposed MMs (Appendix A) found most MMs would have no effect on the findings of the main SA (Reg19) and SA Reg19 incorporating proposed modifications. This is because the changes do not fundamentally change the aim or direction of the Plan. A few MMs have been identified as requiring further consideration. These are as follows:
- MM1.1 The Plan period - (this MM accounts for 24 changes to the Plan).
 - MM4.3 Site Allocation Mi16 Mitcham Gasworks
 - MM5.1 Removal of the wider Morden town centre area from policy
 - MM5.2 Site Allocation Mo4, Site deliverability
 - MM9.2a Site Allocation Wi1: Battle Close
 - MM19.1 (New policy) Monitoring and Monitoring framework
- 3.3. Each of these MMs have been considered in further detail, covering the following elements:
- Consideration of reasonable alternative approaches
 - Appraisal against the SA framework
 - Potential for mitigation / enhancement
 - Monitoring

4 Consideration of alternatives

- 4.1. The council explored whether there were any reasonable alternatives in relation to the proposed modifications. It was considered that no alternatives were reasonable or needed to be appraised through further SA work.

5 Appraisal of the modifications

- 5.1 The Main Modifications that are 'screened-in' have been appraised in further detail against the full SA Framework. The results are presented below under each Modification and then cumulatively.

Figure 3: SA scoring matrix.

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

Figure 4: Appraisal of the modifications MM1.1 The Plan period - *(this MM accounts for 24 changes to the Plan)*.

Main Modification	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22
MM1.1 The Plan period - <i>(this MM accounts for 24 changes to the Plan)</i>.	No Significant Effect on Sustainability Objectives. This MM is the result of the Plan's period changing by one year. But importantly, as before the Plan will still cover a 15-year period.																					

Figure 5: Appraisal of the modifications MM4.3 Site Allocation Mi16 Mitcham Gasworks

Main Modification	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	
MM4.3 Site Allocation Mi16 Mitcham Gasworks																							
Commentary	The MM impact on the SA objectives are positives on a number of the social objectives; this is because there would be an increase in housing delivered on the site, from 200-400, to 650 new homes in an area of housing and inequalities. The positive effects on housing, population demand and growth, health and wellbeing, and social inclusion. This will have a positive impact in the context of overall housing needs for Merton.																						

Figure 6: MM5.1 Removal of the Wider Morden Town Centre area from policy

Main Modification	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022
MM5.1 removal of the wider Morden town centre area from policy and Policies Map (see appendix below for map)																						
SA commentary	<p>No minor significant impact on the SA objectives have been identified. These are solely on the social SA Objectives. The assessment has identified impact on following: Health and wellbeing, Housing, Safe environments, Population demand and growth, social inclusion and cohesion and a minor impact on Local employment and Economic growth objectives. The minor impacts on the Objectives the proposed MM will ensure the deliverability of the Morden Regeneration zone which, overall will have a positive impact to the wider area and importantly has potential to kick start growth in the wider area.</p>																					

Figure 7: MM5.2 Appraisal of the modifications site Allocation Mo4, Site deliverability

Main Modification	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	
MM5.2: Site Allocation Mo4 Site deliverability (comprehensive regeneration)																							
SA commentary	The MM is regarding the changes to the delivery period of the site or the site allocation or its land use. The proposed MM will have some minor positive impacts but overall these are not significant.																						

Figure 8: Appraisal of the modifications MM9.2a Site Allocation Wi1: Battle Close

Main Modification	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	
MM9.2a Site Allocation Wi1: Battle Close.																							
SA commentary	The MM impact on the SA objectives are positives on several the social objectives this is because there would be an increase in housing delivered on the site. This will have a positive impact in the context of overall housing needs for the Merton.																						

Figure 9: Appraisal of the modification MM19.1 (new policy) Monitoring and Monitoring framework

Main Modification	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22
MM19.1 (new policy) Monitoring and Monitoring framework																						
<p>To improve clarity of the proposed monitoring arrangements that will gauge the effectiveness of the policies and will help to inform the Local Plan review process, and therefore ensure the overall soundness of the Local Plan.</p> <p>Some of the indicators that have been included will be influenced by many factors and not just the Local Plan. They still provide a useful way of monitoring the outcomes performance of the Plan. It will monitor the wider policy context, to ensure that the Local Plan remains consistent with national policy and other key plans and strategies.</p> <p>Inclusion of the chapter is crucial to monitor the effectiveness of the Plan. Therefore, there are no negative impacts to this new policy and monitoring framework.</p>																						

Cumulative effects of the Modifications

5.2 The MM give rise to minor positive effects on specific SA Objectives. The effects are either local in nature relating to a particular site or specific to a particular topic area with a narrow focus. Therefore, when considered in combination, the effects are still not likely to be significant as they do not interact in such a way to generate in-combination effects.

6 Mitigation and enhancement

6.1 No further mitigation or enhancement measures were identified at this stage.

Monitoring

6.2 Monitoring measures set out in the SA Report remain appropriate. No significant effects have been identified as a result of the Modifications. A final list of monitoring measures will be presented within the SA Statement produced once the Local Plan is adopted.

Appendix 1: Schedule of Main Modifications to Merton’s Draft Local Plan – 20 May 2022

7 — ~~Red strikethrough~~ text indicates a proposed deletion

Red underlined text indicates a proposed addition to the text

Text in *italics* in the Proposed Changes column have a descriptive or instructive function and do not represent text to be retained unchanged.

The page and paragraph numbers are those in the [Stage 3 pre-submission draft Local Plan consulted on 22 July to 6 September \(Ref. 0D1\)](#) An absent Mod Ref. number in a sequence of numbers represents a former modification that is no longer proposed.

Figure A1: SA screening of the Main Modifications

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	SA Screening
MM1.1 (<i>this MM accounts for 24 changes to the Plan</i>).	14	1 st sentence below subheading: Identifying Merton’s Growth areas	A considerable proportion of Merton’s growth up to 2036/ 37 and beyond is, expected to be, delivered in the Opportunity Area (OA). The OA is, designated in the London Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton’s OA.	Soundness. To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year plan period to be 2022/23 - 2036/37.	March 2022 in response to Inspectors’ preliminary matters	Screening into the SA
MM1.2	32	Spatial vision, new bullet point	<u>Have protected and improved access to the borough’s Metropolitan Open Land (MOL), parks and open spaces, and have protected and enhanced biodiversity and areas of nature conservation.</u>	Soundness: For compliance with national policy and to reflect the environmental Strategic Objectives set out on page 29.	May 2022 – response to Inspectors’ MIQs.	Details added to the Vision of the Plan but the policy requirements were already covered elsewhere in the Plan. Therefore, the overall implications for the SA are insignificant.

MM2.1	35	2.1.1	<p>In accordance with Paragraph 149 of the NPPF 2019 and Paragraph 1523 of the Draft NPPF 2021, 'Plans should take a proactive approach to ...</p>	<p>To improve accuracy and demonstrate the soundness of the Local Plan with regards to the latest NPPF published July 2021.</p> <p>Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors' Preliminary Letter March 2022.</p>	<p>March 2022 - response to Inspectors' preliminary matters</p>	<p>New evidence – New NPPF (2021) was introduced by the Government. However, The draft NPPF of the 2021 was published and informed the Plan.</p> <p>No implication for the SA findings</p>
MM2.1a	42	Policy CC2.2 Minimising Greenhouse Gas Emissions	<p>1. Minimising Greenhouse Gas Emissions</p> <p>We will require all proposed All development within the borough <u>should seek to demonstrate that the fullest contribution to minimising</u> greenhouse gas emissions has been made on site. This will be achieved by requiring:</p> <p>2.— All development:</p> <p><u>We will require:</u></p> <p>3. All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:</p> <p>a. To reduce greenhouse gas emissions on-site and minimise both annual and peak energy demand in accordance with the Mayor of London's Energy Hierarchy below, or in line with any future locally derived methodology:</p> <ul style="list-style-type: none"> i. Be lean: use less energy and manage demand during operation ii. Be clean: exploit local energy resources (such as secondary heat) and supply energy 	<p>Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.</p>	<p>May 2022 – response to the Inspector's MIQs</p>	<p>Changes are for clarity and effectiveness. No implication for the SA findings</p>

			<p>efficiently and cleanly</p> <p>iii. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site</p> <p>iv. Be seen: monitor, verify and report on energy performance</p> <p>4. All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:</p>			
MM2.2	42	Policy CC2.2 Minimising Greenhouse Gas Emissions, part b	To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended.	March 2022 – response to Inspectors’ preliminary matters	Removal of the text does not change direction of policy. No implication for the SA findings
MM2.2a	43	Footnote 3	This represents a minimum improvement beyond Part L of Building Regulations 2013. When Building Regulations are updated we will seek to apply publish an equivalent standard against the new Building Regulations.	To improve clarity in response to the Inspector’s Matters Issues and Questions.	May 2022 – response to the Inspector’s MIQs	Changes are for clarity. No implication for the SA findings
MM2.2b	48	2.2.17	In order to incentivise developers to implement lower carbon strategies on site where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development (e.g. 30 years) will therefore be offset at a rate of £300/t as at 2021. The price for offsetting carbon is regularly reviewed; this will be monitored and, if necessary, updated. Any changes to Merton’s suggested carbon offset price will be updated in future guidance.	To improve clarity in response to the Inspector’s MIQs.	May 2022 – response to the Inspector’s MIQs	Changes are for clarity. No implication for the SA findings

MM2.3	64	Policy CC2.5 (a-d)	<p>5. Minimising Waste and Promoting Circular Economy</p> <p>Merton Council will require all All development proposals to should adopt a circular economy approach to building design and construction, <u>and be designed for durability, flexibility and easy disassembly</u>, to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon. This will be achieved by requiring:</p> <p>All development:</p> <p>a. To prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.</p> <p>b. To be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the 'in use' and 'end of life' phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.</p> <p>c. To ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime. <u>Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.</u></p>	Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	May 2022 – in response to the Inspector's Matters, Issues & Questions	Changes are for clarity and effectiveness. No implication for the SA findings
MM2.4	64	Policy CC2.5 (e)	e. To undertake a Whole Life-Cycle Carbon assessment proportionate to the	Modified to clarify and improve the	May 2022 – in	Changes are for clarity and

			scale of development and demonstrate that whole life-cycle carbon savings have been maximised <u>actions taken to reduce life-cycle carbon emissions.</u>	effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	response to the Inspector's Matters, Issues & Questions	effectiveness. No implication for the SA findings
MM3.1	81	Colliers Wood: Policy N3.1, New part after f	<u>Supporting tall buildings within Colliers Wood town centre in accordance with the details in the Strategic Heights Diagram for Colliers Wood town centre and the requirements in Policy D12.6 Tall Buildings.</u>	To be in general conformity with London Plan Policy D9 part B1 Tall Buildings.	November 2021 – for submission	Introduces details on building height to the area. The area has already been screened to accommodate tall building which must have regard to local character, historic assets such as Conservation Areas. Therefore this has been adequately screened. Changes made to be in conformity with London Plan. No implication for the SA findings.
MM3.2	93	Site Allocation CW2, Approach to tall buildings	A mixed-use redevelopment within the site could include taller (AM1.9) buildings subject to consideration of impacts on existing character, heritage and townscape and based on the principle of the existing Britannia Point being the pinnacle height of a family of buildings of	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022 – response to Inspector's Stage 1 matters	Introduces details on building height to the area. The area has already been screened to

			<p>varying height, forming a coherent cluster that enhances the wider Colliers Wood area.</p> <p><u>The Strategic Heights Diagram for the Colliers Wood Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'</u></p>		INSP03	<p>accommodate tall building which must have regard to local character, historic assets such as Conservation Areas. Therefore this has been adequately screened. Changes made to be in conformity with London Plan. No implication for the SA findings.</p>
MM3.3	102	Site Allocation CW5, Design and accessibility guidance	<p>Opportunity to improve connectivity across Colliers Wood and improve the condition of the Pickle Ditch.</p> <p><u>Development proposals must protect and enhance the Wandle Valley Metropolitan Open Land (MOL) along the western boundary of the site, in accordance with the Green Infrastructure policies set out in Chapter 15.</u></p>	For clarity and accuracy and to maintain consistency with London Plan and National Policy.	May 2022 – response to Inspector s' MIQ.	Changes made to be in conformity with the London Plan and NPPF. Green Infrastructure polices has already been appraised. No implication for the SA findings
MM3.4	104	Site Allocation CW5, Impacts a designated open space	<p><u>Yes, the western edge</u> Parts of the site to the south are <u>is</u> Metropolitan Open Land (MOL) and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer.</p>	For clarity and accuracy (linked to MM3.3)	May 2022 – response to Inspector s' MIQ.	No implication for the SA findings
MM4.1	119	Site Allocation Mi1 Benedict	Further information: The draft South London Waste Plan 2021-2036 <u>2022-</u>	To improve accuracy and ensure	March 2022	No implication for the SA

		Wharf	<u>2037</u> which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and has been submitted to the Sectary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.	soundness, the plan period for the SLWP has been updated, in line with the current EiP process.		findings
MM4.2	146	Site Allocation Mi11 Raleigh Gardens car park.	Approach to tall buildings: Development of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.	Amending an error at Reg19. Site is not suitable for tall buildings.	May 2022 – response to Inspector s’ Stage 1 matters INSP03	Factual error. No implication for the SA findings
MM4.3	159, 161	Site Allocation Mi16 Mitcham Gasworks	Indicative site capacity: 200-400 Around 650 new homes ... Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings <u>of up to 10 storeys</u> subject to consideration of <u>design policies, along with a replacement telecoms mast on top of the tallest building.</u> impacts on existing character, heritage and townscape.	Updated to reflect the latest information as agreed in the Statement of Common Ground with the landowners and to ensure that the Plan is justified and effective.	May 2022	New evidence – update to the housing numbers on site. Screen in
MM5.1	173	Morden: Policy N5.1, KEY OBJECTIVES: MORDEN	6. Providing more high quality homes Incorporate Provide new homes in the Morden and in particular, within the Morden Regeneration Zone Wider Morden Town Centre Area with a diverse mix of housing sizes and tenures.	To improve clarity and accuracy of where the majority of new homes will be delivered. Main Modification MM3.1 results in tall buildings only being supported within the Morden Regeneration Zone (Mo1). The	N o v e m b e r 20 21 – for su b mi	Removal of wider Morden town centre area from policy. New approach to delivering comprehensive regeneration within 15 years. Screen in

				<p>removal of references to the potential appropriateness of tall buildings within some locations in the Wider Morden Town Centre Area (WMTCA), but outside the Morden Regeneration Zone, results in the designation of the WMTCA no longer being justified, as development proposals within this area could be addressed by means of other policies within the draft Local Plan and the London Plan. All references to the WMTCA are therefore proposed to be removed.</p> <p>As the details of future Opportunity Area Planning Framework are still unknown, it is considered reasonable and justified to include the former</p>	ss io n	
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				WMTCA in the Merton Opportunity Area boundary.		
MM5.1a	177	Morden: Policy N5.1 part a	<u>Development pProposals for large sites (0.25 hectares and above)</u> that <u>assist contribute to</u> the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo41(AM5.10), will be supported.	Improve clarity that incremental development proposals on large sites (0.25ha and above) can contribute to the delivery of comprehensive regeneration and to ensure that the Plan is positively prepared and justified.	May 2022	As above for MM5.1. Screen in
MM5.1b	182	5.1.18	...There are also multiple other land ownership interests within the Morden Regeneration Zone <u>and landowners are strongly encouraged to work together.</u> <u>and a ll</u> and assembly <u>strategy</u> will be required to ensure that the <u>comprehensive regeneration of Site allocation Mo1 can be achieved by the end of this local plan period and site can be developed in a comprehensive manner,</u> (AM5.16a)to avoid fragmented development and suboptimal densities in this highly accessible location...	Changes informed by discussions with landowners and proposed to ensure that the plan is positively prepared.	May 2022	As above for MM5.1 Screen in
MM5.1c	199	Site allocation Mo3, Infrastructure Requirements	Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a	For consistency with national policy.	May 2022 - in response to the Inspector s' MIQs.	Changes made to be in conformity with NPPF. No implication for the SA findings

			Design and Access Statement or Landscaping Plan submitted with any planning application. <u>In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wandle Valley MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.</u>			
MM5.2	202	Site Allocation Mo4, Site deliverability	Commencement within 5 years and delivery in phases within 105-15 years.	To improve clarity and consistency with other site allocations and to ensure that the site allocation is 'justified'.	May 2022 – in response to the Inspectors' MIQs.	Changes to the delivery period of the site. This could potentially change the SA findings. Screened In
MM9.1	268	Wimbledon: Policy N9.1, part j.	Securing <u>improvements to public transport and (AM9.2)</u> investment in Wimbledon station to improve the passenger experience and reduce severance with new bridges over the railway . Any proposals for Wimbledon Station should provide links to neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.	Main modification to make the plan effective and deliverable by removing reference to new bridges over the railway as this would need to be enabled by Crossrail2, which is unlikely to occur in the plan period.	November 2021 – for submission	Changes made to be in conformity with NPPF. No implication for the SA findings
MM9.2	268	Wimbledon Policy N9.1, new part after j	<u>Creating a more pleasant environment for shopping and leisure activities in by reducing traffic dominance and managing delivery and servicing needs in a safe, efficient and sustainable way, including through exploring the use of freight consolidation and last mile delivery solutions.</u>	For consistency with national policy and clarity.	November 2021 – for submission	Introduces factors within the Mayor's Transport Strategy and links to Local Plan policies on delivery and servicing. No

						implication for the SA findings
MM9.2a	277	Site Allocation Wi1: Battle Close	Indicative site capacity (new homes): 50 – 70-1035 new homes.	Effectiveness	May 2022- response to the inspectors ' questions	Screened In
MM9.3	281	Site Allocation Wi2:	<p>Approach to taller buildings. Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.</p> <p><u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u></p>	For further clarity on building heights and general conformity with the London Plan Policy.	<p>March 2022 – response to Inspectors ' preliminar y matters</p> <p>May 2022</p>	<p>Introduces details on building height to the area. The area has already been screened to accommodate tall building which must have regard to local character, historic assets such as Conservation Areas. Therefore this has been adequately screened. Changes made to be in conformity with London Plan. No implication for the SA findings.</p>
MM9.4	283 and 284	Site allocation Wi3: ALTEC site	<i>Move the following existing paragraph from "site description" on page 283 to "design and accessibility guidance" on page 284</i>	To make the plan effective and in recognition of the Statement of Common Ground between LB	May 2022 – response to the Inspectors	Moved text within the site allocation - the overall effects remain

			The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.	Merton and LB Wandsworth, January 2022	' questions	unchanged. No implication for the SA findings
MM9.5	284	Wi3: ALTEC site	<i>Design and Accessibility guidance:</i> Development proposal must respect the site's historic setting including the views to St Mary's Church and the surrounding area and the views from the Grade II* listed Wimbledon Park. <i>Impacts listed buildings or undesignated heritage assets</i> Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and the Wimbledon Club (privately owned) are the remains of a 18th century Capability Brown designed landscape which is now a Grade II* listed Historic Park and is on the "heritage at risk register"	Consistency with national policy and with Grade II* reference already included in Wi3 site description on page 283	May 2022 – response to the Inspectors' questions	Corrects error that was already addressed elsewhere. No implication for the SA findings
MM9.5a	284	Site allocation Wi3, new paragraph under Infrastructure requirements	<u>In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wimbledon Park MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.</u>	For clarity and consistency with national policy.	May 2022 – response to the Inspectors' MIQ.	For clarity and consistency with national policy. No implication for the SA findings

MM9.6	308	Site Allocation Wi12	Approach to tall buildings Development of the site could include taller buildings <u>of up to 10 storeys subject to consideration of impacts on existing character and townscape. subject to consideration of impacts on existing character and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments' and D12.6 'Tall buildings'.</u>	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022	Policy introduces a building height to the site. The site has already been screened to accommodate tall building heights which must have regard to local character, historic assets such as Conservation Areas. Therefore site has been adequately screened. Changes made to be in conformity with London Plan. No implication for the SA findings
MM11.1	333	H11.1	<u>Strategic</u> policy H11.1 Housing Choice	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors' preliminary matters	Changes made to be in conformity with the NPPF. No implication for the SA findings
MM11.2	334	Policy H11.1 (f) Table	Threshold (gross)	Affordable housing tenure split	To comply more effectively with the PPG on First Homes	May 2022- response Changes made to be in conformity with

			10 or more homes	70% Low-cost rent 30% Intermediate <u>(Including a minimum of 25% First Homes)</u>	and to improve clarity.	to Inspector s' Matters, Issues and Questions	the NPPF/PPG No implication for the SA findings
			2-9 homes	70% Low-cost rent 30% Intermediate <u>(Including a minimum 25% First Homes).</u>			
MM11.4	339	New paragraph following Figure 4.1.3 and before paragraph 11.1.12	<u>For First Homes the affordable home ownership prices will differ from those set out in supporting paragraph 11.1.11 and Figure 4.1.3 as in accordance with government requirements First Homes must be discounted by a minimum of 30% against the market value and after the discount is applied the first sale must be at a price no higher than £420,000 in Greater London.</u>		To comply more effectively with the PPG on First Homes and to improve clarity	May 2022-response to Inspector s' Matters, Issues and Questions	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings
MM11.5	339	Paragraph 11.1.14	First Homes are a form of discounted market sales housing and to be considered as such must meet the requirements set out in the MHCLG Ministerial Statement published on 24th May 2021 Written statements - Written questions, answers and statements - UK Parliament and the definition and eligibility requirements set out in NPPG Guidance https://www.gov.uk/guidance/first-homes . <u>These national policies and guidance, in addition to paragraph 64 of the National Planning Policy Framework also set out specific exceptions to the general requirements for First Homes and low-cost home ownership dwellings which we</u>		To improve clarity of the Plan	May 2022-response to Inspector s' Matters, Issues and Questions	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings

			<u>will have regard to as appropriate in the determination of submitted planning applications.</u>			
MM11.6	339	Paragraph 11.1.4	First Homes are an intermediate tenure therefore in accordance with government requirements, proposals for new homes will be considered against the intermediate tenure split element of Policy H11.1(Housing Choice). <u>On schemes where policy-compliant provision of First Homes does not result in 10% of the overall housing yield of the site being available for affordable home ownership, any shortfall in this respect would need to be made up from the rest of the intermediate contribution before other types of intermediate affordable housing would be considered.</u>	To comply more effectively with the PPG on First Homes and to improve clarity.	May 2022- response to Inspector s' Matters, Issues and Questions	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings
MM11.7	341	Paragraph 11.1.19	Only in exceptional circumstances for schemes proposing 10 or more homes (gross) will the provision of affordable housing off-site or as a financial contribution in lieu of provision on site be considered subject to demonstrating to our satisfaction that this exception is justified, <u>and such schemes will be required to contribute to the objective of creating mixed and balanced communities and meet the requirements set out in the London Plan supporting paragraphs 4.4.9 to 4.4.13 (inclusive).</u>	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspector s' Matters, Issues and Questions	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings
MM11.8	342	Paragraph 11.1.23 - Supporting paragraph 11.1.23 of the Plan:	<u>In accordance with the NPPF and London Plan Policy H7 (Monitoring of affordable housing) The the information on off-site and cash in lieu delivery is monitored and published annually as part of Merton's annual Infrastructure Funding Statement and Merton's Authority Monitoring Report (AMR).</u>	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspector s' Matters, Issues	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings

					and Questions	
	345	New paragraph following paragraph 11.1.38	<u>Securing M4(2) and M4(3) dwellings</u> <u>New supporting paragraph:</u> <u>M4(2) and M4(3) dwellings should be secured via planning conditions to allow the Building Control body to check compliance of a development against the optional Building Regulations standards.</u>	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022- response to Inspector s' Matters, Issues and Questions	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings
MM11.9	345 New paragraph following paragraph 11.1.38	345 New paragraph following paragraph 11.1.38	<u>NEW PARAGRAPH:</u> <u>There may be site specific factors and viability issues which may warrant flexibility in the application of the accessible housing standards M4(2) and M4(3) requirements set out in Policy 11.1(d) for specific developments. The council will have regard to the exceptional circumstances detailed in PPG (Housing for Older and Disabled People); Government Housing: optional technical standards and paragraph 3.7.6 of the London Plan or subsequent updates to these in determining where the application of flexibility is warranted.</u>	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022- response to Inspector s' Matters, Issues and Questions	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings
MM11.1	346	H11.2	<u>Strategic</u> policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspector s' Preliminary Matters question (d) March 2022	May 2022- response to Inspector s' Matters, Issues and Questions	Changes made to be in conformity with the NPPF/PPG No implication for the SA findings
MM1.1	346	H11.2	We will aim to deliver a minimum of 11,374 additional homes for the	See above - initial MM1.1 at Page 14	March 2022 –	Screen in

			period 2022/23 - 2036/37 2021/22 - 2035/36 .	Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	response to Inspectors' preliminary matters	
MM2.2	346	Policy H11.2, part c	Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 <u>and having regard to</u> Merton's design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.	See above MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters	Removal of the text does not change direction of policy. No implication for the SA findings
MM1.1	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 11,732 11,374 additional homes for the period 2021/22 - 2035/36 <u>2022/23 - 2036/37</u> will come forward in Merton by:	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors' preliminary matters	Screen in
MM1.1	347	Supporting new paragraph after 11.2.4	<u>The SHLAA 2017 findings indicates that for Merton the target for the period 2029/30 to 2033/34 is 474 homes per annum then for the remaining period 2034/35 to 2036/37 increases to 548 homes per annum.</u>	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors' preliminary matters	Screen in

MM1.1	348	11.2.5	In accordance with the London Plan requirements and in consultation with and endorsed by the GLA, the housing trajectory set out in Figure 4.2.1 demonstrates how Merton's housing target will be met for the Local Plan period 2022/23 – 2036/37 2021/22 – 2035/36 using a stepped housing delivery target.	See above - initial MM1.1 at Page 14	In response to Inspectors preliminary letter, March 2022	Screen in
MM1.1	348	11.2.7	As Figure 4.2.2 below indicates Merton's annual housing target will be set at 775 <u>700</u> homes per annum for the period 2022/23 2021/22 , increasing to 950 for the period 2024/25 – 2026/27 2023/24 , and then increase to 1,080 <u>1,555</u> for 2027/28 - 2028/29 the period 2024/25 - 2026/27 , then further increase to 1,350 for the period 2027/28 – 2028/29 . This ensures that Merton's Local Plan housing requirement for the Plan period <u>2022/23 – 2036/37 including the shortfall of 928 new homes is met.</u> <i>Table 4.2.2 (now 11.2.2) "Merton's housing delivery stepped target" has been modified and is included at the end of this document.</i>			Screen in
MM1.1	348	11.2.8	In accordance with London Plan paragraph 4.1.11, Merton's target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings <u>and includes the rolling forward</u>			Screen in

			<p><u>of the small sites target beyond 2029.</u> This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to <u>2036/37 2035/36</u> of <u>1,644 1,096</u> as indicated in the following table:</p> <table border="1"> <thead> <tr> <th>Plan period</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>2029/30 - 2033/34</td> <td>2,370</td> </tr> <tr> <td>2034/35 – <u>2036/37 2035/36</u></td> <td><u>1,644 1,096</u></td> </tr> <tr> <td>2029/30 – <u>2036/37 2035/36</u></td> <td><u>4,014 3,466</u></td> </tr> </tbody> </table>	Plan period	Target	2029/30 - 2033/34	2,370	2034/35 – <u>2036/37 2035/36</u>	<u>1,644 1,096</u>	2029/30 – <u>2036/37 2035/36</u>	<u>4,014 3,466</u>			
Plan period	Target													
2029/30 - 2033/34	2,370													
2034/35 – <u>2036/37 2035/36</u>	<u>1,644 1,096</u>													
2029/30 – <u>2036/37 2035/36</u>	<u>4,014 3,466</u>													
MM1.1	349	Figure 4.2.1	<p><i>Figure 11.2.1 'Merton Housing Trajectory 2022/23 – 2036/37' updated - included at the end of this document</i></p>	<p>See above - initial MM1.1 at Page 14</p> <p>Formerly AM11.10. Moved to Main Modifications in response to Inspectors preliminary matters</p>	<p>March 2022 – response to Inspectors' preliminary matters</p>	<p>Screen in</p>								
MM11.11	366	Policy H11.6 e	<p>The suitability of ground conditions, particularly in respect to the potential to flooding. <u>Please also refer to policies contained in Chapter 15 (Green and Blue Infrastructure) including policies F15.7; F15.8 and F15.9.</u></p>	<p>To improve clarity and link it relationship with other policy areas of the Plan in response to MIQs</p>	<p>May 2022- response to Inspectors' Matters, Issues and Questions</p>	<p>A stronger emphasis to other policies in the Plan. No significant implications for SA findings though.</p> <p>No implication for the SA findings</p>								
MM11.12	366	Policy H11.6 f	<p>The need or demand for accommodation provision and the available capacity on existing sites in the borough.</p>	<p>To improve clarity and link it relationship with other policy areas of the Plan in response to MIQs</p>	<p>May 2022- response to Inspectors' Matters,</p>	<p>The removal provides clarity and does not change the policy direction. No implication</p>								

					Issues and Questions	for the SA findings
MM11.13	366	Policy H11.6	<u>NEW CRITERION The provision of a high standard of amenity for future occupants of sites particularly in terms of residential amenity, noise and air quality. Please also refer to policies contained in Chapter 12 (Places and Spaces in a Growing Borough) and Chapter 15 (Green and Blue Infrastructure) including policies F15.7 to F15.10.</u>	To improve clarity of the Plan in response to MIQs	May 2022. Response to Inspector s' Matters, Issues and Questions	A stronger emphasis to other policies in the Plan. No significant implications for SA findings though. No implication for the SA findings
MM11.14	368	New supporting para following existing para 11.6.6	<u>New para:</u> <u>The extent of provision of appropriate on-site facilities will be determined on a site-by-site basis proportionate to the scale of the proposed site to ensure that any extra provision meets their needs and takes account of the size of the site and the needs and demographics of the families resident on them.</u>	To improve clarity and soundness of the Plan in response to MIQs	May 2022- response to Inspector s' Matters, Issues and Questions	Changes are for clarity. No implications for SA findings.
MM12.1	423	Policy 12.11.j	Basements or subterranean development must be designed to minimise the risk of internal flooding and must not increase the risk of flooding elsewhere. Proposals must include sustainable urban drainage scheme to reduce runoff rates and implement proposals to conserve and re-use water through rainwater harvesting. <u>Where basements discharge to the sewer network, they must install suitable</u>	To ensure the Local Plan is justified and effective.	May 2022 – response to Inspector s' Stage 1 matters INSP03	Changes provide greater detail in relation to basement developments and wastewater infrastructure. The effects are unlikely to be significant

			<u>positively pumped devices.</u>			though or change the overall SA findings in relation to landscape and heritage.
MM13.1a	461	13.5.31	Neighbourhood parades are identified to ensure that local shopping facilities are retained within walking distance of residents to meet their day-to-day needs. <u>As set out in the Table 13.5 “Merton’s town centres”, neighbourhood parades are not designated town centres and as such, large increases in commercial floorspace will be resisted in line with policy Tc13.6</u>	To improve clarity	May 2022 – response to the Inspector s’ questions	Changes are for clarity. No implications for SA findings.
MM13.1a	449	13.3.9	13.3.9 In circumstances where proposals for mixed use development are considered, proposals must be designed to ensure the future occupation and function of employment uses, upon completion. <u>In line with the Agent of Change principle set out in the London Plan and the NPPF, the council will not support proposals on scattered employment site where these would curtail the successful operation of non-residential uses.</u> The premises/sites retained for employment uses must:	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	Changes are for clarity. Agent of Change is already in other areas of the Plan. No implications for SA findings.
MM13.1	454	Policy TC 13.5	Within Wimbledon, Colliers Wood, Mitcham and Morden town centres a3. In addition to (a)2 , supporting proposals for developments that: ia. Provide a range of commercial unit sizes; ib. Provide a wide range of town	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	Changes are for clarity. No implications for SA findings.

			<p>centre type uses which contribute towards the vitality and viability of town centres including shopping, leisure, entertainment, cultural, community and offices.</p> <p><u>c. Betting shops (use identified as sui generis), are not compatible with the main retail or social function of the town centres and are not considered appropriate new uses within the primary shopping area.</u></p> <p>Within Local town centres a4. Supporting proposals: ... <u>c. that do not provide betting shops within the primary shopping area.</u></p>			
MM13.2	457	13.5.8	<p>Betting shops and hot food takeaways (use identified as sui generis), are not compatible with the main retail or social function of the town centres and thus are not considered appropriate new uses outside of<u>within</u> the primary shopping area <u>of Merton's town centres.</u></p>	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	Changes are for clarity. No implications for SA findings.
MM13.3	464	Policy TC 13.6	<p><u>2.</u> The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment <u>(required over 280sqm net new floorspace)</u> submitted is proportionate to the scale of the development proposed and satisfies the council's requirements.</p>	Positively prepared and consistent with national policy.	May 2022 – response to the Inspectors questions	Changes made to be in conformity with the NPPF/PPG. No implication for the SA findings
MM13.4	465	13.6.5 (first sentence)	<p>Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area <u>of the new proposal</u> exceeds 280sqm.</p>	Clarity and justification	May 2022 – response to Inspectors matters, issues and questions.	Changes are for clarity. No implications for SA findings

MM13.5	465	13.6.5 (second sentence)	In accordance with the National Planning Policy Framework 2019 (NPPF 2021 paragraph 90(MM2.1) , impact assessments will be required for leisure and office development above 2,500 sqm gross located outside town centres and not in accordance with the development plan.	For consistency with national policy	May 2022 – response to Inspectors matters, issues and questions.	Changes made to be in conformity with the NPPF/PPG. No implication for the SA findings
MM15.0	505	New paragraphs after 15.1.2	There are 9 areas of Metropolitan Open Land (MOL) designated in Merton, which are of great importance to the green character of the borough. Through the green infrastructure reviews undertaken for this Plan, the MOL boundaries have been reviewed and the council does not consider that major changes are needed to accommodate growth. The MOL sites illustrated on the Policies Maps will continue to be protected from inappropriate development in accordance with London Plan Policy G3 and NPPF paragraph 147. Further information is set out in Policy O15.2 Green Infrastructure and Open Space. Some minor boundary amendments have been made to MOL sites on the Policies Map through this Local Plan. These include corrections to mapping irregularities, and inconsistencies, or changes to reflect the built form on site that has come forward through approved planning applications, which no longer protects the spatial or visual openness of the MOL. These minor boundary changes to the Policies Map help to create strong, defensible and permanent boundaries and ensures consistency with the NPPF and London Plan.	For consistency with national policy.	May 2022 – response to Inspector s' matters issues and questions.	Providing further details in regards MOL in accordance with the NPPF. Minor boundary modifications only, based on evidence. Text added to policy to be in conformity with the NPPF/PPG No implication for the SA findings
MM15.1	511	Policy O15.3 (d)	Require development to contribute to net	Agreed with the	November	Changes are

			gains in <u>B</u> biodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links. <u>Where development is adjacent to or includes a river, natural banks must be restored with a 10m buffer included.</u>	Environment Agency in Statement of Common Ground. Added as AM15.6	2021 – submission (added as AM15.6)	for clarity No implications for SA findings
MM15.2	544	Policy P15.10 Improving Air Quality and Minimising Pollution	g. Development proposals must consider the impact <u>of air quality. An AQA will be required for proposals</u> introducing new developments in areas already subject to poor air, <u>major developments, developments involving biomass boilers, biomass or gas CHP (including connections to existing networks where the increased capacity is not already covered in an existing AQA), substantial earthworks or demolition and any development that could have a significant impact on air quality, either directly or indirectly. The following will be needed:</u>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector	Changes are for clarity. No implications for SA findings
MM15.3	545	Policy P15.10 Improving Air Quality and Minimising Pollution	j. We will seek financial contributions using Planning Obligations towards air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality. <u>In determining the contribution, the council will refer to the London Plan Air Quality Neutral guidance (section 5).</u>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022. Matters and Issues Question (MIQs) from the Planning Inspector	Changes are for clarity. No implications for SA findings
MM15.4	549	Policy P15.10 Improving Air Quality and Minimising	<u>New Para: The council will apply London Plan policy SI1 Improving air quality to all</u>	Following review of the policy in light of MIQs – the council propose making the	May 2022 – Matters and Issues	Detail has been removed from the policy text to the

		Pollution	<u>development proposals in the borough, along with associated Mayoral guidance on Air Quality Neutral and Air Quality Positive standards and on ways to reduce construction and demolition impacts.</u>	MM for clarity.	Question (MIQs) from the Planning Inspector	supporting text to avoid duplication of the London Plan. Therefore, the overall implications for the SA are insignificant. No implications for SA findings.
MM15.5	549	Policy P15.10 Improving Air Quality and Minimising Pollution	<p>New para.New Paragraph</p> <p><u>The aim of an AQA is to find any significant impact on local air quality and/or disamenity due to dust and/or odour and/ or whether new development will introduce new exposure in an area of poor air quality. The contents of the AQA will depend on the nature of the proposed development.</u></p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector	Paragraph has moved location. But still remains within the supporting text as before. No implications for SA findings.

MM15.6	549	Policy P15.10 Improving Air Quality and Minimising Pollution	<p>We have adopted the London Plan’s approach to Air Quality Positive and Neutral development. Large master planning and large-scale developments have the potential to include methods to improve local air quality. All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been, exploited, financial contributions to offset the impact of the development on air quality may be, considered as a final intervention. The process and calculation for this are set out in Section 5.2 of the GLA’s Air Quality Neutral Planning Support Document (AQNPSPD).</p>	<p>Following review of the policy in light of MIQs – the council propose making the MM for clarity.</p>	<p>May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector</p>	<p>Changes are for clarity. No implications for SA findings.</p>
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MM15.7		Policy P15.10 Improving Air Quality and Minimising Pollution	<p><u>The whole of Merton is designated an Air Quality Management Area (AQMA) and has three Air Quality Focus Zones in the borough. The main sources of particulate matter are road transport (50.4%), re-suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). In respect of the transport sources apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NOx emissions and 80% of the PM10 emissions (based on 2013 modelled data).</u></p> <p><i>New para.</i></p> <p><u>Merton's air quality priorities are to continue to encourage sustainable travel and sustainable construction; to reduce exposure to air quality and raise awareness; and to work in partnership with residents, community and business groups. Transport for London and other organisations to concentrate on local pollution problems in Merton.</u></p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector	Changes are for clarity. No implications for SA findings.
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MM15.8	After para 15.10.7	Policy P15.10 Improving Air Quality and Minimising Pollution	<p>The local plan can influence air quality in several ways, for example through what development is proposed and where, and the provision made for sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible. The whole borough has been declared an Air Quality Management Area (AQMA) for last two decades.</p> <p>We seek to tackle poor air quality in an integrated way, the Local Plan together with a wider range of measures set out in Merton's Air Quality Action Plan, which supports the Government's Clean Air Strategy (2019), the Mayor of London Environment Strategy (2018) and other legislation.</p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.		Changes are for clarity. No implications for SA findings.
	15.9	Policy P15.10 Improving Air Quality and Minimising Pollution	<p>New para.-Consideration must be given to the impact of improvements on air quality elsewhere. For instance, traffic reductions could improve local air quality but push traffic-related air quality impacts to other areas. Early engagement with us is encouraged to assess how the development could avoid these unintended consequences. The</p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022	Changes are for clarity. No implications for SA findings.

			supporting emerging Air Quality Supplementary Planning Document (SPD) provides further details on for AQA and what; we expect to be, proved within an AQA. The assessment should provide decision makers with sufficient information to understand the scale and geographic scope of any detrimental, or benefit impacts on air quality and enable them to exercise their professional judgement in deciding whether the impacts are acceptable, in line with best practice.			
15.10	15.10.09		<p>Air Quality Neutral and Positive</p> <p>We have adopted the London Plan's approach to Air Quality Positive and Neutral development. Large master planning and large-scale developments have the potential to include methods to improve local air quality. All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been, exploited, financial contributions to offset the impact of the development on air quality may be, considered as a final intervention. The process and</p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022	Changes made to be in conformity with the London Plan. No implication for the SA findings.

			calculation for this are set out in Section 5.2 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD).			
MM16.3	574	16.4.14	The Government <u>has published a decarbonising transport strategy which includes proposals to increase the uptake of electric vehicles (EVs) and end the sale of new petrol and diesel cars by 2030. are progressing a strategy to significantly increase the uptake of electric vehicles (EVs) over the coming decades and confirmed in November 2020 that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned.</u>	Supporting text amended and updated to include reference to the Government's recently published <u>decarbonising transport</u> strategy.	November 2021 for submission – was previously AM16.23	The direction of the policy has not changed. Changes made to reflect the latest evidence. The implications for the SA findings are not likely to be significant.
MM16.4	575	16.4.15	... Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it. <u>For developments that comprise of a mix of dedicated private parking spaces and communal parking, the London Plan requirement for 20% active EV provision should be fully applied to any communal parking facilities. Developers should also refer to Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles (publishing.service.gov.uk) that may also be applicable to the development.</u> For public car parking facilities, such as at retail facilities, EV infrastructure should include...	Sentence added to provide clarity in relation to application of the London Plan standard for the provision of EV charge points for mixed developments. This is in response to newly published Government proposals for building regulation to require all new dwellings with dedicated parking space to have a charge point installed. For developments comprising a mix of units with communal parking and houses with private driveways, there is concern that a development could	March 2022	Changes made to be in conformity with the London Plan. No implication for the SA findings. The direction of the policy has not changed, Changes reflect the latest evidence. The implications for the SA findings are not likely to be significant.

				attempt to meet both the building regs requirement and the London Plan 20% standard by allocating charge points first to units with private parking and thus leaving communal parking facilities with no or inadequate EV charging provision.		
MM18.1	After page 583	After the Appendices title page, insert a new initial appendix	Table showing superseded policies.	To improve clarity regarding which adopted policies are superseded by the Local Plan and to ensure the effectiveness and regulatory compliance of the Local Plan.	March 2022 – response to Inspectors' preliminary matters	No implications for SA findings.
MM18.2	641	New glossary term after Convenience Retailing	<u>Conversion</u> <u>The conversion of existing single dwellings into two or more smaller dwellings.</u>	To improve clarity in response to the Inspector's MIQs.	May 2022 – response to Inspector's MIQs.	No implications for SA findings.
MM-MOL Map-01a	Map	Policies Map – Metropolitan Open Land	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-3).</i>	This site contains 4 residential properties which do not form part of the adjoining cemetery and are physically separated. They do not meet any of the MOL criteria set out in the London Plan and officers consider that their inclusion in	November 2021 – for submission	Minor boundary change to reflect reality of built development. No implication for the SA findings. Please refer to section below.

				<p>the MOL is an anomaly from the previous policy maps and they should be removed to correct this error. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to maps Appendix 1 for details</p>		
MM-MOL Map-01b	Map	Policies Map – Metropolitan Open Land	<i>Slight boundary amendments around the Eveline Day Nursery SW20 9NA from Lower Morden Metropolitan Open Land (MOL-3).</i>	<p>Corrections to the MOL boundary have been made to fix a GIS cartographic error from the Regulation 19 maps where the MOL boundary did not align with the property boundaries. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to maps Appendix 1 for details.</p>	November 2021 – for submission	Boundary did not reflect reality on the ground. No implication for the SA findings. Please refer to section below.
MM-Open Space Map-02	Map	Policies Map – Open Space	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Merton and Sutton Joint Cemetery Surrounds Open Space (M074).</i>	<p>This site contains 4 residential properties which do not form part of the adjoining cemetery. They do not meet the Open Space criteria set out in the Merton Green Infrastructure Study 2020. Officers consider that their inclusion in the Open</p>	November 2021 – for submission	Minor boundary change to reflect reality of built development. No implication for the SA findings.

				<p>Space designation is an anomaly and they should be removed. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>		
MM-Open Space Map-03	Map	Policies Map – Open Space	<i>Remove part of Tooting and Mitcham Imperial Sports Ground from Open Space (P028), in accordance with approved planning application 19/P4094.</i>	<p>In accordance with approved Planning Application 19/P4094. This is to align with the amendment made to the MOL boundary, as per the Stage 3 Policy maps. The site was reviewed by officers prior to Stage 3 consultation; however it was left off the published map in error. The modifications ensure that the Local Plan is 'justified'.</p>	November 2021 – for submission	Boundary change to reflect planning approval after December 2021 No implication for the SA findings.
MM-Open Space Map-04	Map	Policies Map – Open Space	<i>Remove part of the Eastfields estate site owned by Clarion Housing Group from Streatham Park Cemetery Open Space (C004).</i>	<p>In accordance with approved Planning Application 19/P4094. This is to align with the approved planning application 17/P1717. This change was highlighted by Clarion Housing Group through their response to the Stage 3 Local Plan consultation. The modifications ensure that the Local Plan is 'justified'.</p>	November 2021 – for submission	Boundary change to reflect planning permission. No implications for SA findings.

				Refer to map Appendix 1 for details.		
MM-Open Space Map-04	Map	Policies Map: Open Space	<i>Remove part of the Long Bolstead Recreation Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).</i>	In accordance with approved Planning Application 19/P4094. This is to align with the approved planning application 17/P1717. This change was identified by officers following the Clarion Housing Group response to the Stage 3 Local Plan consultation. The modifications ensure that the Local Plan is 'justified'.	November 2021 – for submission	Boundary change to reflect planning permission. No implications for SA findings.
MM-SINC Map-05	Map	Policies Map: Sites of Importance for Nature Conservation	<i>Wimbledon Park SINC (MeBI02) - An additional area of land needs to be included in this SINC as the land contains a number of veteran trees and other wildlife interest.</i>	Reviewed following Stage 3 Local Plan response and confirmed by LBM Greenspaces team). As part of the recent Wimbledon Park Lake project this land has been extensively surveyed and it holds nature conservation interest in line with the SINC designation. It is considered that the site was excluded in error. This change was identified through a Stage 3 Local Plan consultation response and has been confirmed with the	November 2021 – for submission	Reflecting council's assessment following a Reg19 response. No implications for SA findings.

				Council's Ecologist. The modifications ensure that the Local Plan is 'justified'.		
MM-SINC Map-06	Map	Policies Map: Sites of Importance for Nature Conservation	<i>Myrna Close SINC (MeBII10) - The SINC boundary needs to be amended in accordance with approved planning application 16/P3430.</i>	In accordance with approved Planning Application 16/P3430 to reflect the residential properties that have been built and the new ecology area created on site. The site was reviewed by officers prior to Stage 2a consultation; however it was left off the published map in error. The modifications ensure that the Local Plan is 'justified'.	November 2021 – for submission	Boundary change to reflect built development. No implications for SA findings.
MM-Green Corridor Map-07	Map	Policies Map – Green Corridor	<i>Ridge Road to Wimbledon Park Green Corridor (GC19) - The Green Corridor boundary needs to be amended to remove part of the Thames Water site at Byegrove Road, Colliers Wood.</i>	In discussions with Thames Water officers agree that this part of the site does not meet the Green Corridor criteria and therefore should be removed from the Policies Map. Up to date site photos were provided by Thames Water following the Stage 3 submission. The modifications ensure that the Local Plan is 'justified'.	November 2021 – for submission	Reflect change following Reg 19 response. No implications for SA findings.
MM-APZs-Map-08	Map	Policies Map – Archaeological Priority Zones	<i>Removed the map showing Archaeological Priority Zones from the Policies Map.</i>	For accuracy and to ensure that the Local Plan is 'justified', this data has been	November 2021 – for submission	Updated maps and terminology from Historic

				removed because it has been superseded by Archaeological Priority Areas according to the latest information from Historic England.		England. No implication for the SA findings.
MM-Conservation Areas-Map-09	Map	Policies Map Conservation Areas	<i>Added labels to the map showing the Conservation Area codes and also a table below the legend with the name of each of the Conservation Areas</i>	For clarity and to ensure the Local Plan is “justified”, the Conservation Areas map has been labelled. Refer to map Appendix 1 for details.	November 2021 – for submission	No implication for the SA findings.
MM-Listed Buildings-Map-10	Map	Policies Map Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Historic England. This modification ensures that the Local Plan is “justified”	November 2021 – for submission	Updated information from Historic England. No implication for the SA findings.
MM- Locally Listed Buildings-Map-11	Map	Policies Map Locally Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Merton Council. This modification ensures that the Local Plan is “justified”. Refer to map Appendix 1 for details.	November 2021 – for submission	Updated information from Historic England. No implication for the SA findings.
MM-Wandle Cycle Route-Map-12	Map	Policies Map Wandle Cycle Route	<i>New map to highlight the cycle routes that are part of the Wandle Trail</i>	For clarity the cycle network that is part of the Wandle Trail has been added as a separate map to highlight its importance in enabling	November 2021 – for submission	Update to Map for clarity. No implication for the SA findings

				active travel choices. This change was requested at the Stage 3 consultation from the Wandle Valley Forum.		
MM-Merton-Cycle Network-Map13	Map	Policies Map New map	<i>Cycle network routes have been updated to show the Wandle Missing Link</i>	For accuracy and to ensure that the Local Plan is 'justified', the cycle network map has been updated to reflect the latest agreement on the Wandle Missing Link on the borough boundary between Merton and Wandsworth. Refer to map Appendix 1 for details.	November 2021 – for submission	Update to map at northern borough boundary with Wandsworth. Mainly in Wandsworth. No implications for SA findings
MM19.1	After page 665	Insert new policy M19.1 Monitoring and Monitoring framework	Additional policy(chapter 19)	To improve clarity of the proposed monitoring arrangements that will gauge the effectiveness of the policies and will help to inform the Local Plan review process, and therefore ensure the overall soundness of the Local Plan.	March 2022 – response to Inspectors' preliminary matters May 2022 – response to Inspector's Matters, Issues & Questions	Screen in

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- A. It should be noted that the council does not propose to remove any individual site of MOL in its entirety. As illustrated on the Policies Map (Document 0D2), there are 9 MOL sites within the borough, totalling over 960 hectares. The 12 MOL boundary amendments proposed through this Plan are minimal and are not of a strategic nature. They comprise primarily of minor boundary adjustments which are practical, either to correct mapping errors and anomalies, or to reflect the current built form that has come forward through approved planning applications.
- B. The proposed MOL boundary changes through this Plan result in a de minimis loss (0.11% reduction in MOL overall,(refer to Appendix MIQ5.1 for further details). The 12 proposed MOL boundary changes fall into one of three categories:
- 1) To reflect physical land boundaries and built form that have changed since the 2014 Policies Map was adopted, via approved planning applications that have been implemented and completed. (4 proposed changes).
 - 2) To correct cartographic errors from the 2014 Policies Map and anomalies where the MOL boundary does not reflect the physical site boundary or built form, and the site does clearly not meet the MOL criteria. (6 proposed changes).
 - 3) Where a review of the MOL boundaries and physical features of the site has resulted in the council recommending changes, in accordance with national policy and the London Plan. (2 proposed changes).
- C. For the 10 proposed amendments which fall under the first two categories, these sites have not been identified for release for development, but rather the proposed alterations are simply to correct mapping errors, or to reflect already approved and completed planning applications. There is little to no impact on the environmental quality and accessibility of the remaining MOL, from these changes, as the proposed mapping alterations are to reflect what is physically on the ground.

MM-MOL-Map-01a

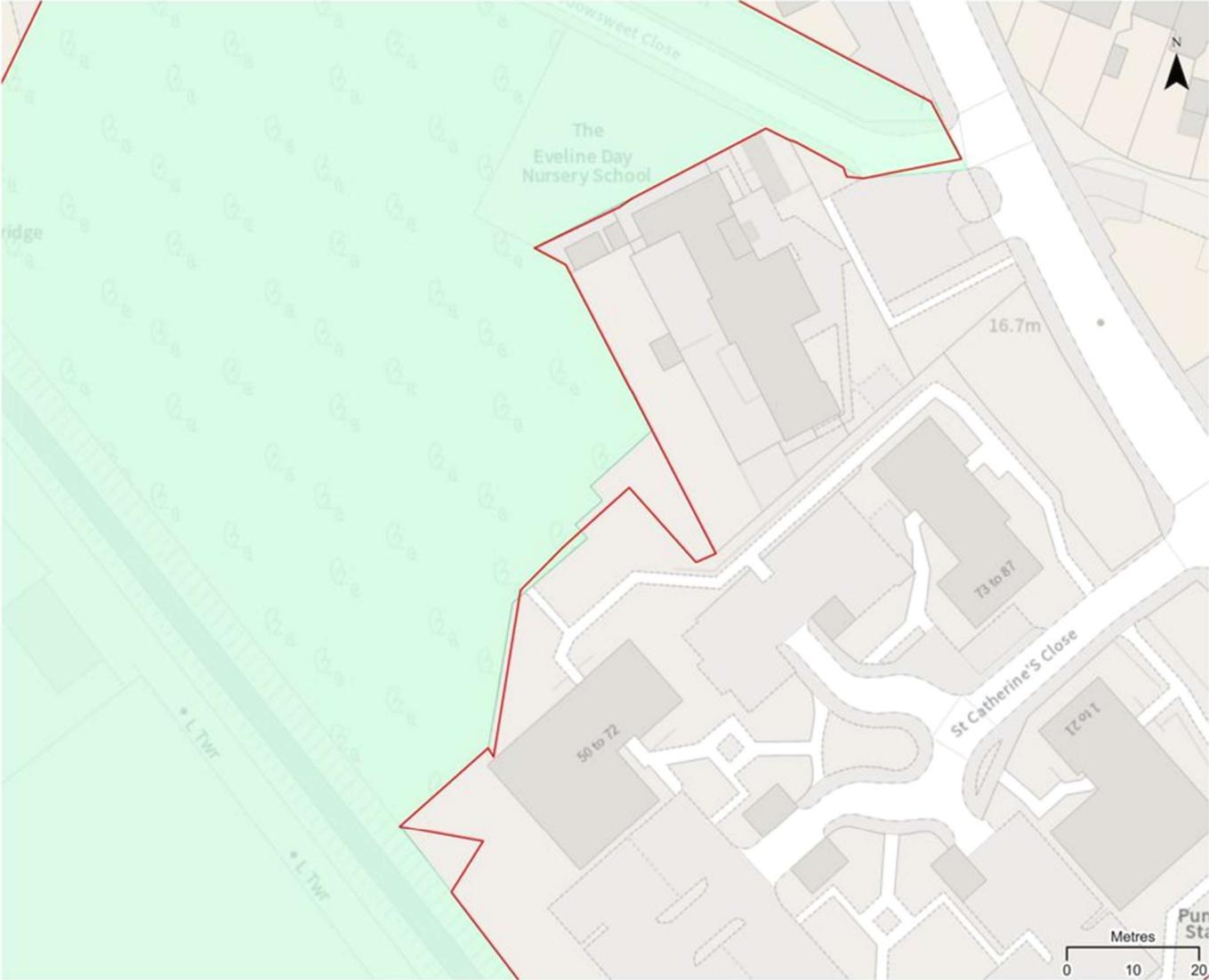
- MOL Stage 3
- MOL Submission



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MM-MOL-Map-01b



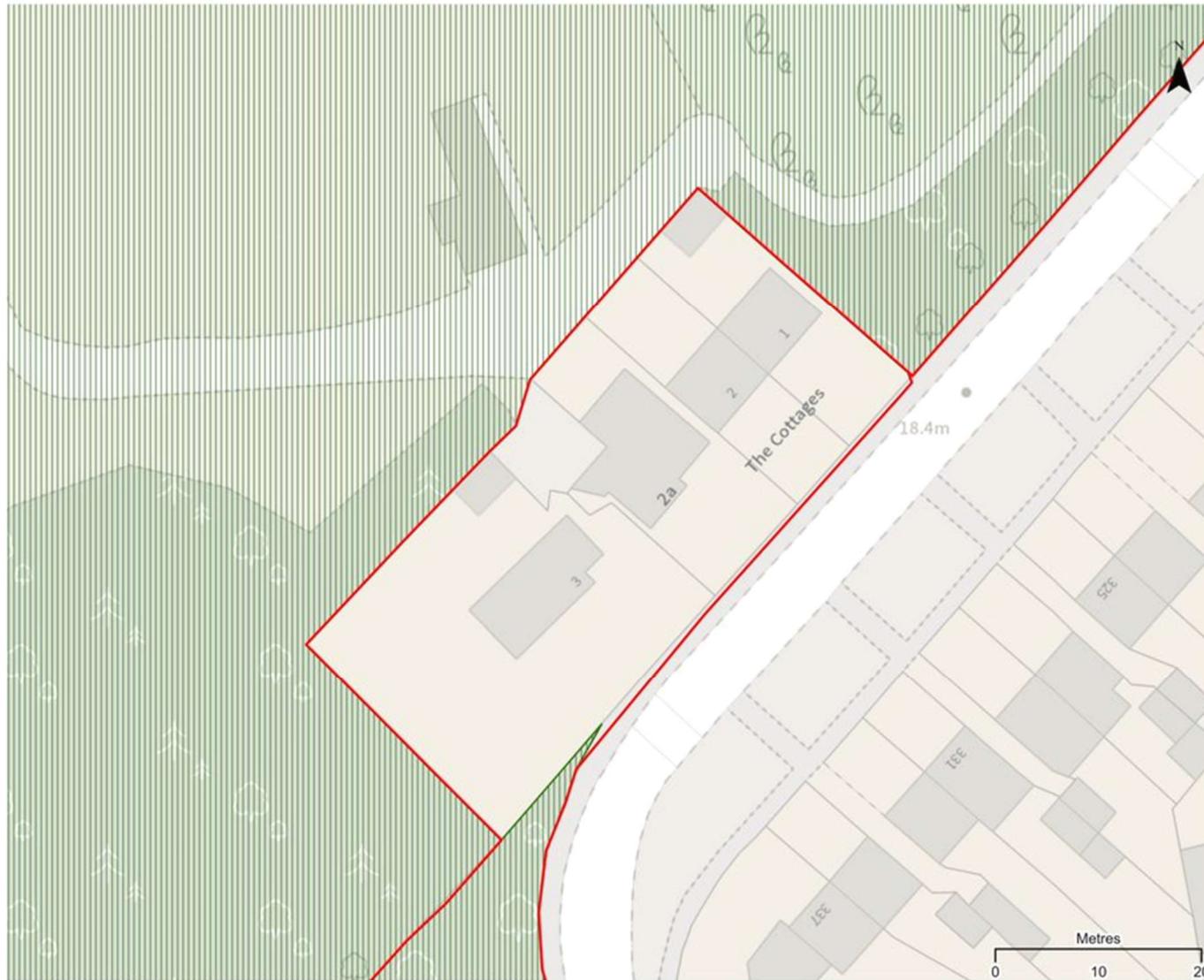
- MOL Stage 3
- MOL Submission

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**MM-Open Space-
Map-02**

-  Open Space Stage 3
-  Open Space Submission



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**MM-Open Space-
Map-03**

-  Open Space Stage 3
-  Open Space Submissior



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**MM-Open Space-
Map-04**

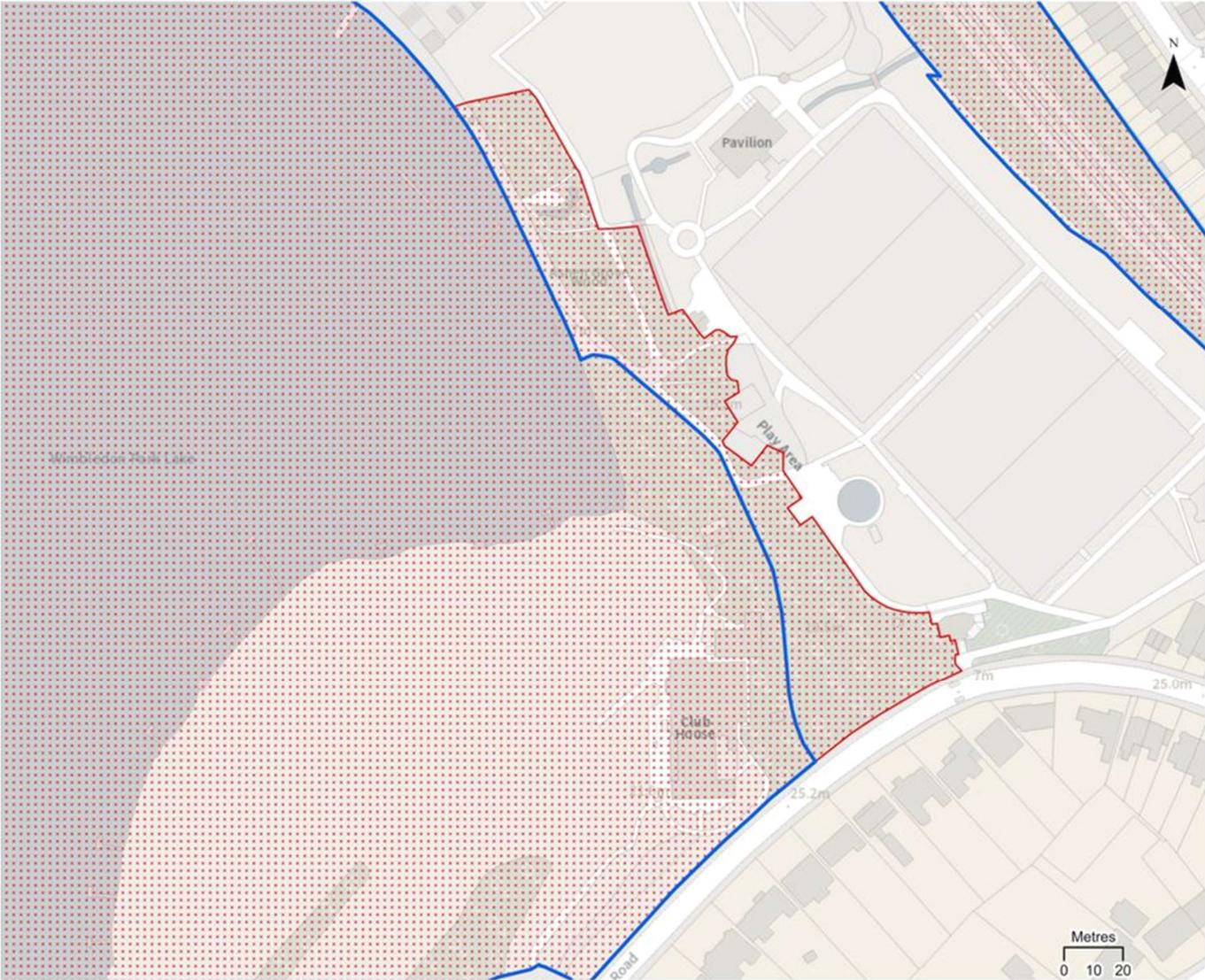
-  Open Space Stage 3
-  Open Space Submissior



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MM-SINC-Map-05



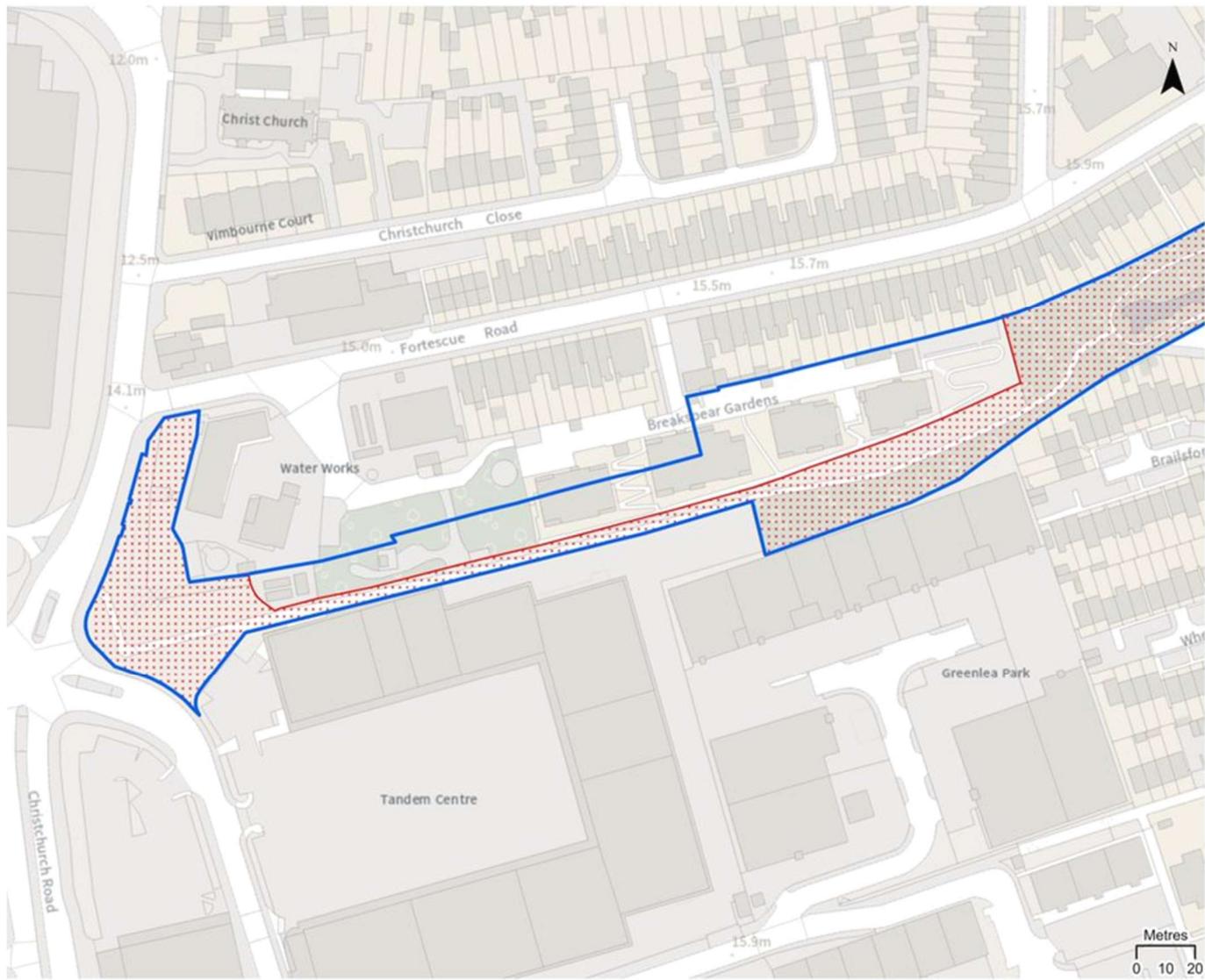
- SINC Stage 3
- SINC Submission

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MM-SINC-Map-06

-  SINC's Stage 3
-  SINC's Submission



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**MM-Green Corridor-
Map-07**

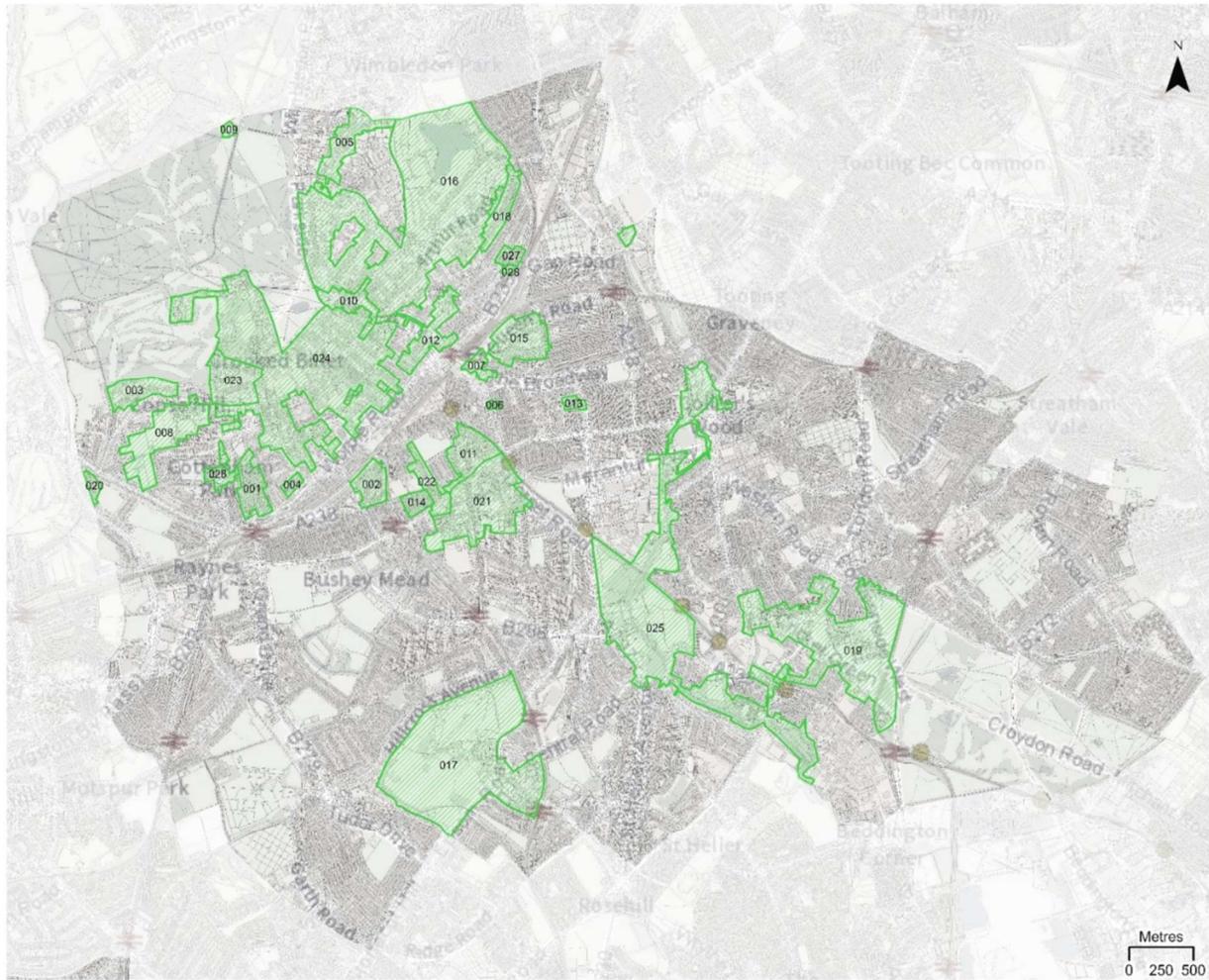
-  Green Corridors Submission
-  Green Corridors Stage 3



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MM-Conservation Areas-Map-09



 Conservation Areas

Area Code	Area Name
001	Lambton Road
002	Dennis Park Crescent
003	Drax Avenue
004	Dunmore Road
005	Bathgate Road
006	Bertram Cottages
007	The Broadway
008	Copse Hill
009	Wimbledon Windmill
010	Wimbledon Village
011	John Innes- Wilton Crescent
012	Wimbledon Hill Road
013	Pelham Road
014	Wimbledon Chase
015	South Park Gardens
016	Wimbledon North
017	Upper Morden
018	Vineyard Hill Road
019	Mitcham Cricket Green
020	Westcombe Avenue
021	John Innes- Merton Park
022	Merton Hall Road
023	Wool Road
024	Wimbledon West
025	Wandle Valley
026	Durham Road
027	Kenilworth Avenue
028	Leopold Road

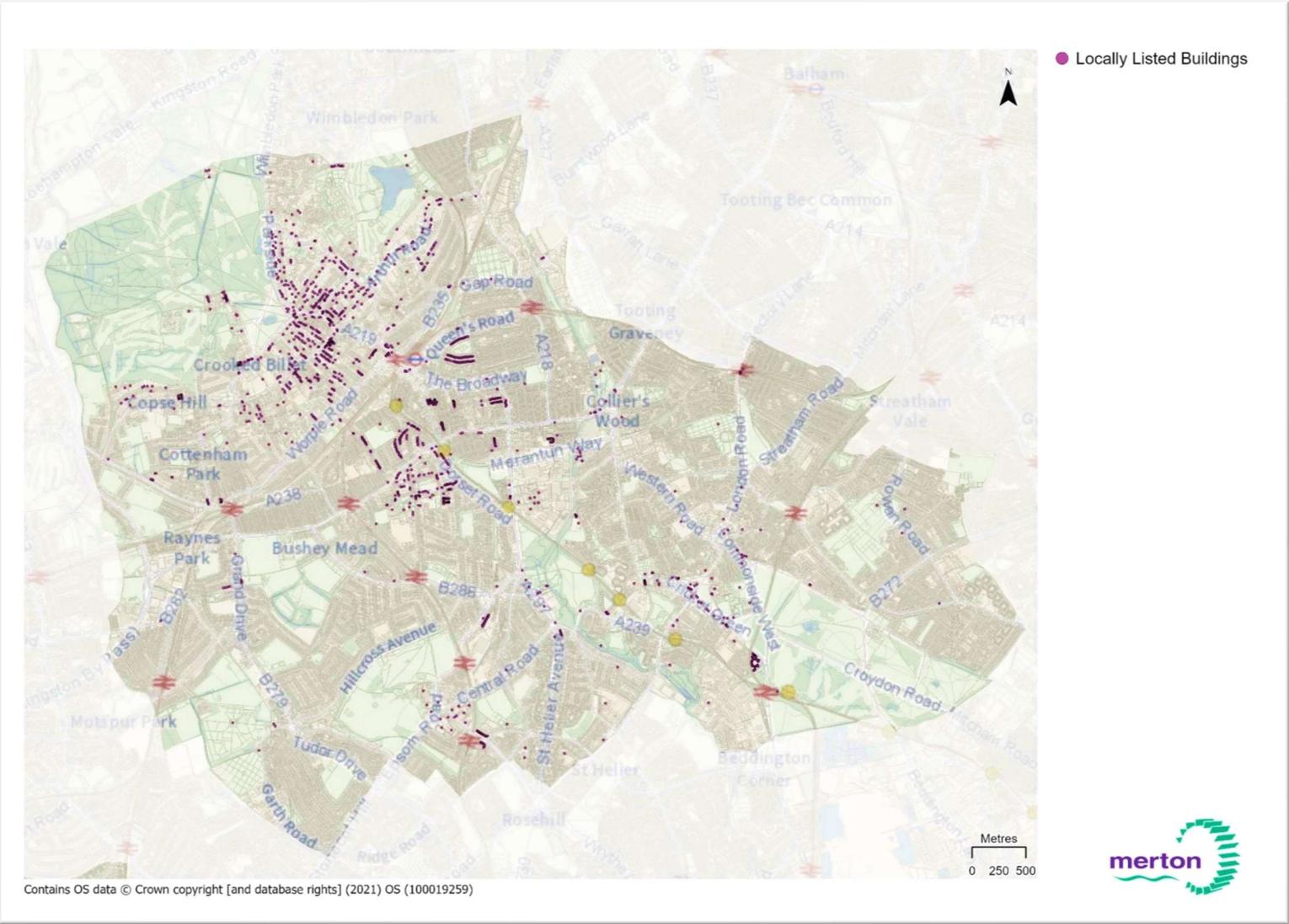
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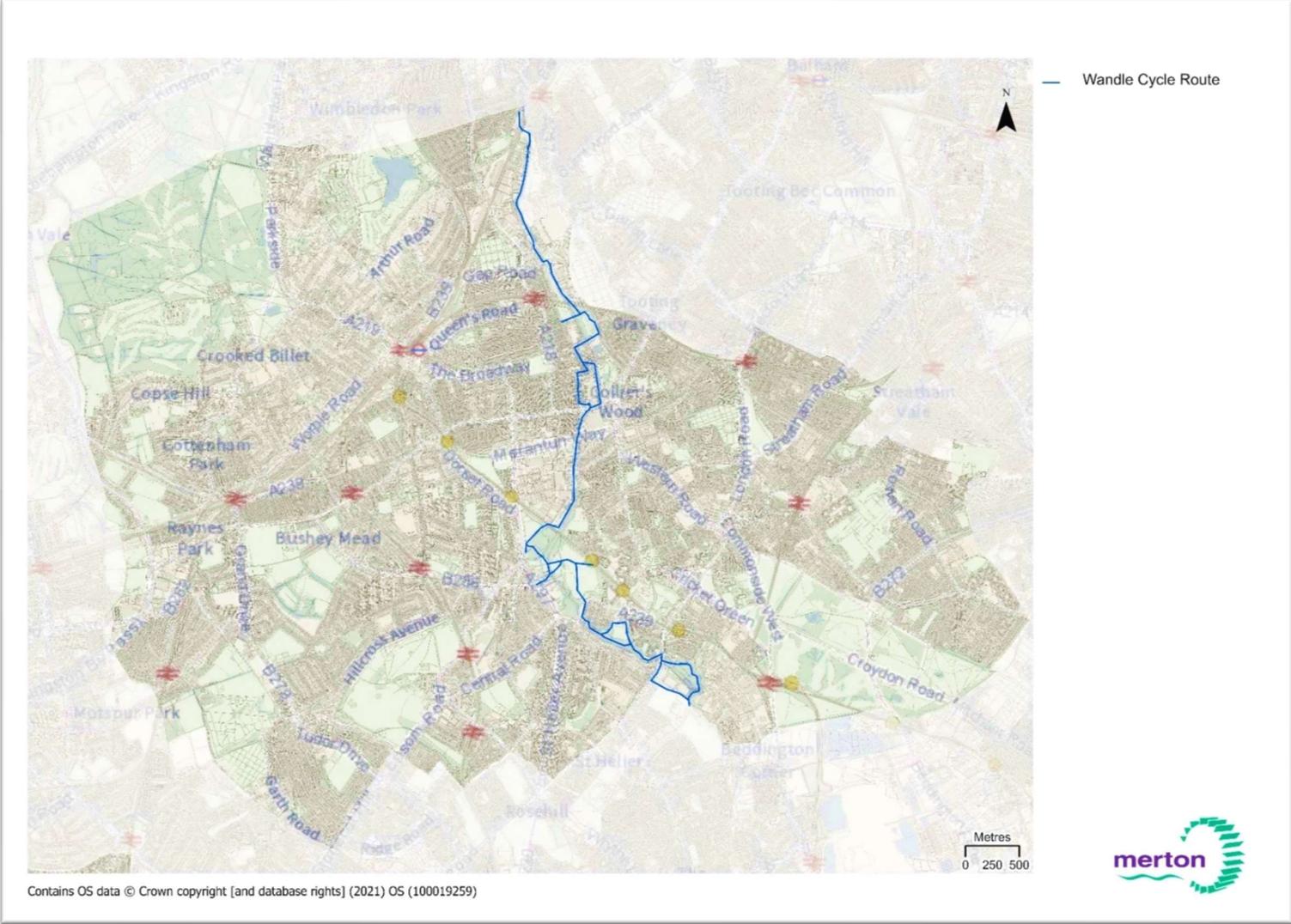
MM-Listed Buildings-Map-10



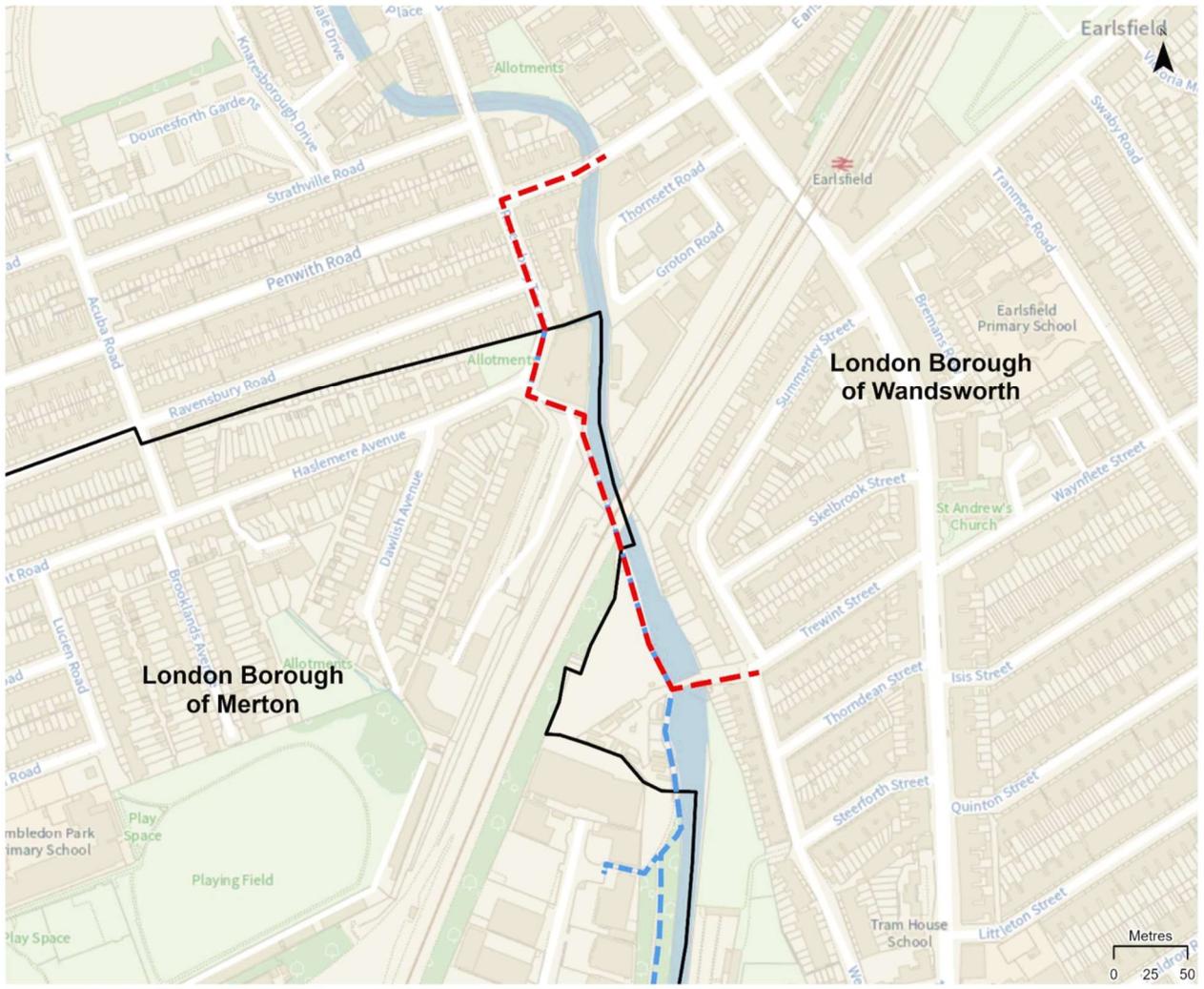
MM-Locally Listed Buildings-Map-11



MM-Wandle Cycle Route- Map-12



MM-Merton-Cycle Network-Map13



- Merton Cycle Network
- Wandle Missing Link
- Merton Borough Boundary

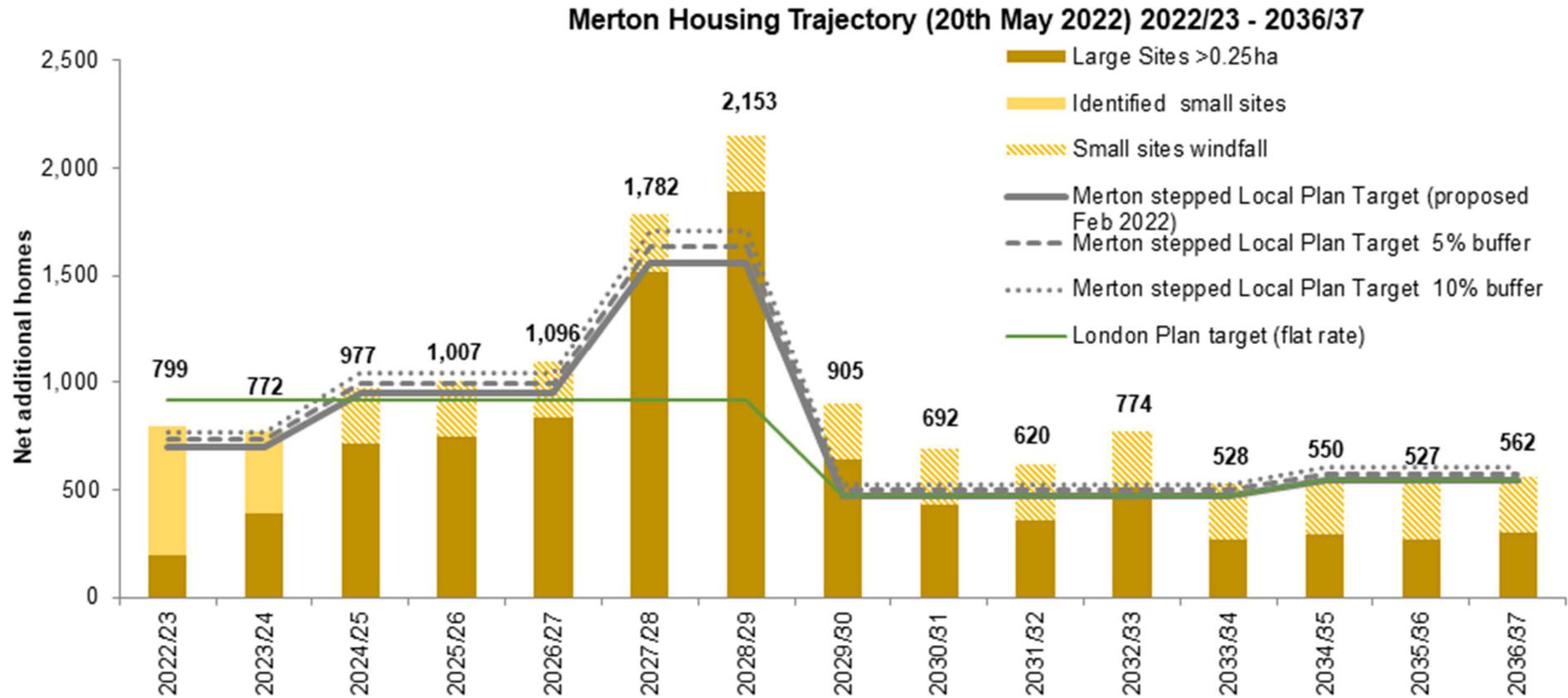
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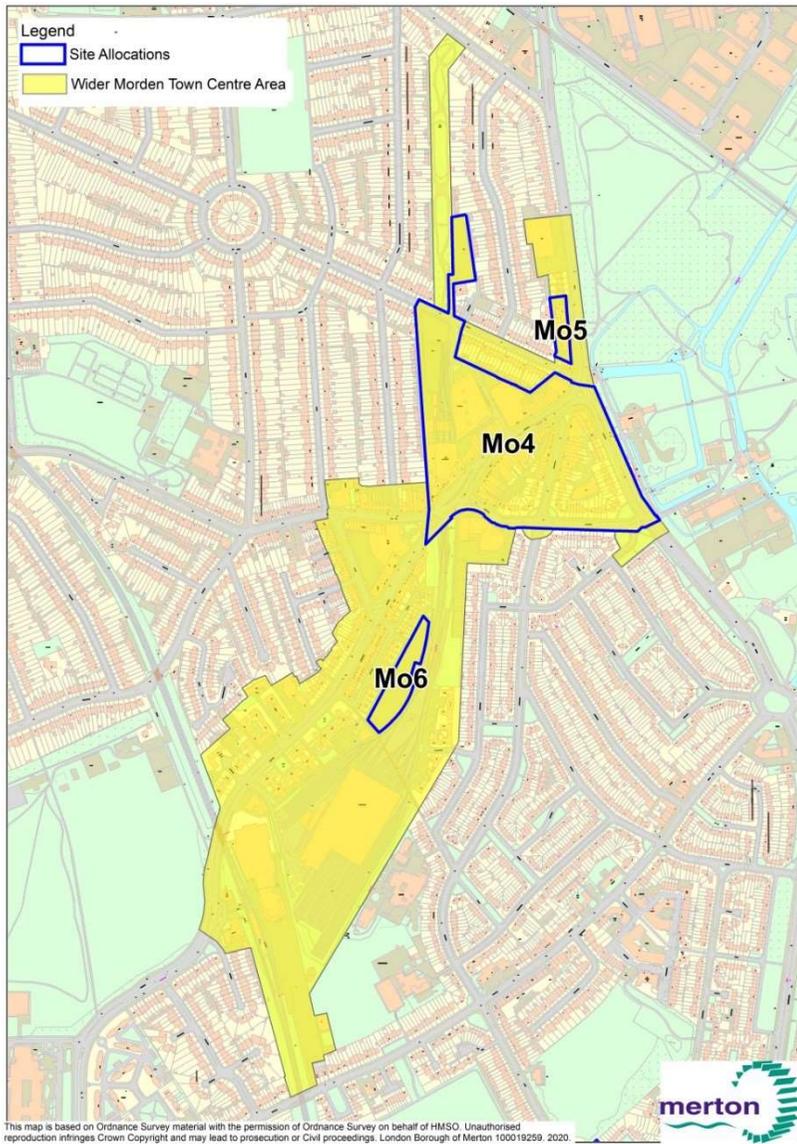


As Figure 4.2.2 below indicates Merton’s annual housing target will be set at 775 700 homes per annum for the period 2022/23 2024/22, increasing to 950 for the period 2024 /25 – 2026/27 2023/24, and then increase to 1,080 1,555 for 2027/28 - 2028/29 the period 2024/25. —2026/27, then further increase to 1,350 for the period 2027/28—2028/29. This ensures that Merton’s Local Plan housing requirement for the Plan period 2022/23 – 2036/37 including the shortfall of 928 new homes is met.

	<u>2024/22</u>	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	<u>Shortfall from 2019/20 and 2020/21</u>	Total
Merton Local Plan target	<u>775</u> <u>750</u>	<u>775</u> <u>700</u>	<u>775</u> <u>700</u>	<u>1,080</u> <u>950</u>	<u>1,080</u> <u>950</u>	<u>1,080</u> <u>950</u>	<u>1,350</u> <u>1,555</u>	<u>1,350</u> <u>1,555</u>		8265 7,360
London Plan target	<u>1,033</u> <u>918</u>	<u>1,033</u> <u>918</u>	<u>928</u>	8265 6,426						

Figure 11 4.2.2 Merton’s stepped housing delivery target





After page 665 (MM19.1) new Policy

19. MONITORING

Policy M19.1 Monitoring

Merton Council will demonstrate the delivery of the Local Plan's spatial vision and strategic objectives by regularly monitoring the implementation of policies.

In the event that delivery falls significantly below what is required to achieve the necessary targets, the council will trigger a full or partial review of the plan in order to address the reasons for under-delivery.

Key indicators that may trigger a full or partial review are:

- A failure to demonstrate a 5-year housing land supply in any two successive monitoring years and the two monitoring years following that indicating no potential for recovery.
- Housing completions fall more than 20% beneath the targets in the housing trajectory over any rolling 3-year period.

Supporting text

19.1.1 Monitoring the Local Plan is crucial to the successful delivery of its vision and strategic objectives.

19.1.2 Section 113 of the Localism Act 2011 sets out the requirements for Authority Monitoring Reports (AMRs). Regulation 34 of The Town and Country Planning (Local Planning) (England) Regulations 2012 provides further detail on these requirements which are also reflected in the National Planning Practice Guidance (NPPG) on Local Plans.

19.1.3 Monitoring is required to ensure that the policies are relevant and effective. Monitoring allows us to understand whether policies have worked as they were intended.

19.1.4 Currently, the council has no reason to believe that the plan will not be implemented in full. However, the council accepts that there could be circumstances where development fails to come forward for a number of reasons, some of which are beyond the control of the council. These could include delivery challenges on a site or a more general slowdown in the economy and its ability to deliver viable

development. Where the council can use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

Local Plan monitoring framework

19.1.5 The monitoring framework sets out the monitoring indicators for the Local Plan, which will be reported in the AMR. The AMR is not the only monitoring tool. There are separate monitoring arrangements of other related strategies, for example, the climate change strategy and action plan, and the South London Waste Plan. The monitoring framework below relates to the performance of this Local Plan.

19.1.6 Regular monitoring will include analysis of delivery data and trends. Taking account of changes in legislation at the regional and national level. Reviewing the plan’s supporting evidence base where necessary. If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to a full or partial review of the Local Plan and its policies.

Reviewing the plan

19.1.7 As required by the NPPF and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council will initiate a review of the plan within five years of adoption.

Local Plan Monitoring Framework

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<u>Growth Area (Opportunity Area)</u>	<u>London Plan indicative target (up to 2041) to deliver 5,000 new homes and 6,000 jobs (indicative figure).</u>	<u>Cumulative housing completions since OA designation.</u> <u>Cumulative non-residential floorspace approvals and completions since OA designation.</u>
<u>Air quality</u>	<u>Number of days p.a. when air pollution is moderate or high for PM10*</u>	<u>Decreasing number of days of high PM10 over a 3-year period.</u>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<u>To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</u>	<u>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre - more than 35 times a year at any measuring site.</u>	
<u>Biodiversity</u> <u>To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</u>	<u>Changes in areas of biodiversity importance.</u>	<u>No net loss of sites of importance for nature conservation (SINCS).</u>
<u>Land and soil condition and pollutants</u> <u>To conserve Merton's geodiversity and protect soils from development and over intensive use.</u>	<u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u>	<u>NO PLANNING PERMISSIONS GRANTED CONTRARY TO ENVIRONMENT AGENCY ADVICE ON FLOOD RISK AND WATER QUALITY GROUNDS.</u>
<u>Sustainable land use</u> <u>To make the best and most efficient use of land to support sustainable patterns and forms of development.</u>	<u>Planning permissions granted and completed.</u>	<u>95% of major planning permissions started within a 3 year period.</u>
<u>Heritage (including architectural and archaeological heritage)</u> <u>To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural,</u>	<u>Number of heritage assets on Historic England's Heritage at Risk Register.</u>	<u>A reduction in the number of heritage assets on the Heritage at Risk register.</u>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<u>through high quality design and protection of open space, valued views and historic assets.</u>		
<u>Flood risk management</u> <u>To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</u>	<u>Number of planning permissions granted contrary to Environment Agency advice.</u> <u>Number and location of Environment Agency flood warnings issued across Merton each year.</u>	<u>No planning permissions granted contrary to Environment Agency advice.</u>
<u>Climate change – operational carbon savings</u> <u>To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon Merton by 2050.</u>	<u>Average percentage improvement in operational carbon emissions against Part L of the Building Regulations.</u> <u>Monitoring changes to Part L of the Building Regulations and the London Plan in case these result in changes to Merton’s policies and targets.</u>	<u>Carbon reduction targets set out in policy CC2.2.</u> <u>Monitoring and updating the Local Plan as required.</u>
<u>Carbon offsetting</u> <u>To offset any carbon shortfall from development where zero carbon cannot be achieved on site.</u>	<u>Carbon offsetting proposed where on site reduction is not achievable.</u> <u>Monitoring changes to the carbon offset price.</u>	<u>Reporting on carbon offsetting in Infrastructure Funding Statement.</u> <u>Monitoring and updating the Local Plan as required.</u>
<u>Energy use</u> <u>To manage and reduce demand for energy.</u>	<u>Energy Use Intensity (kWh/m2/yr) for developments</u>	<u>Energy Use Intensity targets set out in policy CC2.3 from 2025</u>
<u>Embodied Carbon</u> <u>To manage and reduce embodied carbon.</u>	<u>Embodied carbon (kgCO2/m2) from large developments which submit a Whole Life Cycle Assessment</u>	<u>Best practice</u>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<p><u>BREEAM</u></p> <p><u>To achieve a holistic approach to sustainable design and construction.</u></p>	<p><u>Monitoring changes to industry standards for sustainable design and construction.</u></p>	<p><u>Monitoring and updating the Local Plan as required.</u></p>
<p><u>Noise and vibration</u></p> <p><u>To minimise noise, vibration levels and disruption to people and communities.</u></p>	<p><u>An increase in area of the Noise Action planning important areas.</u></p>	<p><u>No increase to area.</u></p>
<p><u>Water quality</u></p> <p><u>To protect and enhance Merton's water bodies.</u></p>	<p><u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u></p> <p><u>River water bodies classified under the Water Framework Directive to achieve good ecological status.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p> <p><u>No decrease of the Water Framework Directive classification of 'good' ecological status.</u></p>
<p><u>Water consumption</u></p> <p><u>Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</u></p>	<p><u>Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.</u></p> <p><u>Number and location of water pollution incidents reported to the Environment Agency across Merton annually.</u></p> <p><u>Water quality status of water bodies across borough.</u></p> <p><u>Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.</u></p>	<p><u>No planning permissions granted against Environment Agency recommendations.</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<p><u>Open space and nature</u></p> <p><u>To protect, connect and enhance Merton’s natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</u></p>	<p><u>Net loss of designated open space for development.</u></p> <p><u>Metres of main river improved and restored across Merton.</u></p> <p><u>Biodiversity Net Gain delivered across Merton.</u></p>	<p><u>No net loss of designated open space.</u></p>
<p><u>Sustainable transport</u></p> <p><u>To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</u></p>	<p><u>Overall sustainable mode share.</u></p> <p><u>Uptake of low emission vehicles.</u></p>	<p><u>Increase in overall sustainable mode share based on a rolling three year average.</u></p> <p><u>Increase in registered EV vehicles in Merton – measured annually.</u></p>
<p><u>Health and wellbeing</u></p> <p><u>To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</u></p>	<p><u>Delivery of healthcare facilities identified in Merton’s Local Plan.</u></p> <p><u>Number of people taking up physical activities and stating they are in ‘good health.’</u></p> <p><u>Number of Health Impact Assessments (HIA) carried out.</u></p>	<p><u>n/a (Monitoring will be reported in the Health and Wellbeing Strategy annual update known as the Merton Story and added to the AMR.)</u></p> <p><u>All development proposals that meet the Local Plan policy requirements to submit a Health Impact Assessment.</u></p>
<p><u>Housing</u></p> <p><u>To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton’s demographic changes and local housing demand.</u></p>	<p><u>Progress against borough wide affordable housing targets.</u></p> <p><u>Number of homes built each year.</u></p>	<p><u>Building regulation M4(3) – 10% of all new build self-contained homes.</u></p> <p><u>M4(2) – 90% of all new build self-contained homes.</u></p> <p><u>50% of new homes borough wide to be affordable across the plan period.</u></p> <p><u>Of affordable homes, 70% to be low-cost rent</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
		<u>30% to be intermediate tenure.</u>
<u>Safe environments</u> <u>To contribute to safe and secure environments for all people including people with Protected Characteristics.</u>	<u>Number of Health Impact Assessments carried out and type of development.</u>	<u>Health Impact Assessments carried out for all developments required by policy.</u> <u>Increase in % of people feeling safe as measured in Merton Residents Survey.</u> <u>Yearly decrease in serious crime and crime against people with Protected Characteristics.</u>
<u>Infrastructure</u> <u>To ensure that environmental, social and physical infrastructure is managed and delivered to support demographic change.</u>	<u>Delivery of infrastructure projects identified in the Infrastructure Delivery Plan.</u>	<u>Number of infrastructure projects delivered.</u>
<u>Design</u> <u>To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</u>	<u>Increase in number of major schemes reviewed by the Design Review Panel at pre – application stage.</u>	<u>% of planning appeals allowed by the Planning Inspector for applications originally refused for design reasons by the council.</u>
<u>Local employment</u> <u>To develop and maintain a healthy labour market.</u>	<u>Number of people unemployed.</u> <u>Number of new jobs created.</u>	<u>% of people unemployed lower than regional and national averages.</u> <u>Increase in number of new jobs created.</u>
<u>Education and skills</u> <u>To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with</u>	<u>Development of floorspace to meet the needs for pupil places.</u> <u>Number of 16- 24-year-olds in training or apprenticeships or work programmes.</u>	<u>Delivery of necessary education floorspace</u> <u>Yearly increase in the number of apprenticeships or work programmes.</u>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<u>disabilities and Black, Asian and other minority ethnic groups.</u>	<u>Number of local people employed or in training as part of large or regeneration developments.</u>	<u>All major developments to provide local people with employment and/or training opportunities.</u>
<u>Economic growth and town centres</u> <u>To increase the vitality and viability of existing town centres, local centres and parades.</u> <u>To ensure a sufficient supply premise to meet demand for industry, logistics and services.</u>	<u>Undertake the shopping survey to measure the retail vacancy rate in Merton's town centres below national and regional rates.</u> <u>Maintain the industrial vacancy rate below national and regional averages.</u>	<u>Maintain the retail vacancy rate below national and regional averages in Merton's town centres.</u> <u>No net loss of employment floorspace in Strategic Industrial Locations.</u>

After page 665 (MM18.1)

Core Planning Strategy (2011) policies replaced by the forthcoming Local Plan

<u>Core Planning Strategy policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>Issues and options.</u>	<u>Good growth chapter</u>
<u>Merton's Core Strategy Spatial Vision.</u>	<u>Chapter 01c: Urban development objectives and vision.</u>
<u>Key Diagram (Figure 8.1 Key Diagram).</u>	<u>Figure 1: Merton's spatial strategy.</u>
<u>Policy CS 1 Colliers Wood.</u>	<u>Policy N3.1: Colliers Wood.</u>
<u>Policy CS 2 Mitcham Town Centre.</u>	<u>Policy N4.1 Mitcham.</u>
<u>Policy CS 3 Morden Town Centre.</u>	<u>Policy N5.1; Morden.</u>
<u>Policy CS 4 Raynes Park Local Centre.</u>	<u>Policy N6.1: Raynes Park.</u>
<u>Policy CS 5 Wandle Valley.</u>	<u>Policy O15.6 Wandle Valley Regional Park.</u>
<u>Policy CS 6 Wimbledon Town Centre.</u>	<u>Policy N9.1: Wimbledon.</u>
<u>Policy CS 7 Centres.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 8 Housing Choice.</u>	<u>Strategic Policy H11.1 Housing choice</u>
<u>Policy CS 9 Housing Provision.</u>	<u>Strategic Policy H11.2 Housing provision</u>
<u>Policy CS 10 Accommodation for Gypsies and Travellers.</u>	<u>Policy No. H11.6 Accommodation for Gypsies and Travellers.</u>
<u>Policy CS 11 Infrastructure.</u>	<u>Strategic policy IN 14.1 Infrastructure.</u>
<u>Policy CS 12 Economic Development.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 13 Open space, nature conservation, leisure and culture.</u>	<u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation.</u>
<u>Policy CS 14 Design.</u>	<u>Strategic Policy D12.1 Delivering well-designed and resilient neighbourhoods.</u>
<u>Policy CS 15 Climate Change.</u>	<u>Strategic Policy CC2.1: Promoting Sustainable Design to Mitigate and Adapt to Climate Change.</u>
<u>Policy CS 16 Flood Risk Management.</u>	<u>Strategic Policy F15.7 Flood Risk Management and Sustainable</u>

	<u>Drainage.</u>
<u>Policy CS 17 Waste Management.</u>	<u>Strategic Policy W14.4 Waste Management.</u>
<u>Policy CS 18 Active Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 19 Public Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 20 Parking, Servicing and Delivery.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Chapter 27 Delivery and Implementation (<i>Delivery of the Spatial Strategy and Core Policies</i>).</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>
<u>Chapter 28 Monitoring Framework.</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>

Sites and Policies Plan (2014) policies replaced by the forthcoming Local Plan

<u>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>DM R1 Location and scale of development in Merton's town centres and neighbourhood parades.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R2 Development of town centre type uses outside town centres.</u>	<u>Policy TC 13.6 Development of town centre type uses outside town centres.</u>
<u>DM R3 Protecting corner/ local shops.</u>	<u>Policy TC13.7 Protecting corner / local shops</u>
<u>DM R4 Protection of shopping facilities within designated shopping frontages.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R5 Food and drink / leisure and entertainment uses.</u>	<u>Policy TC13.8 Food and drink / leisure and entertainment.</u>
<u>DM R6 Culture, arts and tourism development.</u>	<u>Policy TC13.9 Culture, arts and tourism development.</u>
<u>DM R7 Markets.</u>	<u>Policy not taken forward.</u>
<u>DM H1 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>	<u>Policy No. H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>
<u>DM H2 Housing mix.</u>	<u>Policy No. H11.3 Housing mix</u>
<u>DM H3 Support for affordable housing.</u>	<u>Policy No. H11.1 Housing choice</u>
<u>DM H4 Demolition and redevelopment of a single dwelling house.</u>	<u>Policy not taken forward.</u>
<u>DM H5 Student housing, other housing with shared facilities</u>	<u>Policy No. H11.5 Student Housing, other housing with shared facilities and</u>

<u>and bedsits.</u>	<u>bedsits</u>
<u>DM C1 Community facilities.</u>	<u>Policy IN14.2</u> <u>Social and Community Infrastructure</u>
<u>DM C2 Education for children and young people.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM E1 Employment areas in Merton.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E2 Offices in town centres.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E3 Protection of scattered employment sites.</u>	<u>Policy EC13.3 Protection of scattered employment sites</u>
<u>DM E4 Local employment opportunities.</u>	<u>Policy EC.13.4 Local Employment Opportunities</u>
<u>DM O1 Open space.</u>	<u>Policy O15.2 Open Space and Green Infrastructure</u>
<u>DM O2 Nature conservation, trees, hedges and landscape features.</u>	<u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.4 Protection of Trees</u>
<u>DM D1 Urban design and the public realm.</u>	<u>D12.2 Urban design</u>
<u>DM D2 Design considerations in all developments.</u>	<u>D12.3 Ensuring high quality design for all developments</u>
<u>DM D3 Alterations and extensions to existing buildings.</u>	<u>Policy D12.4 Alterations and extensions to existing buildings</u>
<u>DM D4 Managing heritage assets.</u>	<u>Policy D12.5 Managing heritage assets</u>
<u>DM D5 Advertisements.</u>	<u>Policy D12.7 Advertisements</u>
<u>DM D6 Telecommunications.</u>	<u>Policy D12.8 Digital infrastructure</u>
<u>DM D7 Shop front design and signage.</u>	<u>Policy D12.9 Shop front design and signage</u>
<u>DM EP1 Opportunities for decentralised energy networks.</u>	<u>Not taken forward.</u>
<u>DM EP2 Reducing and mitigating noise.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM EP3 Allowable solutions.</u>	<u>Not taken forward</u>
<u>Policy DM EP4 Pollutants.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM F1 Support for flood risk management.</u>	<u>Policy F15.8 Managing Local Flooding</u>
<u>DM F2 Sustainable urban drainage systems (SUDS) and wastewater and water infrastructure.</u>	<u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u>
<u>DM T1 Support for sustainable transport and active travel.</u>	<u>Policy T16.2 Prioritising active travel choices</u>
<u>DM T2 Transport impacts of development.</u>	<u>Policy T16.3 Managing the transport impacts of development</u>
<u>DM T3 Car parking and servicing standards.</u>	<u>T16.4 Parking, deliveries and servicing</u>
<u>DM T4 Transport infrastructure.</u>	<u>T16.5 Supporting transport infrastructure</u>
<u>DM T5 Access to the Road Network.</u>	<u>Not taken forward</u>
<u>Appendices (A –L).</u>	<u>Chapter 17: Appendices</u>
<u>Policies Map (2014)</u>	<u>Polices Map (submitted 2022)</u>

