

# Equality and Diversity Impact Assessment (EDIA) for Merton's Local Plan proposed Main Modifications May 2022

#### 1. Introduction

- 1.1 This Equality and Diversity Assessment reviews the council's proposed Main Modifications to the Local Plan as at May 2022.
- Merton Council submitted the draft Local Plan to the Planning Inspectorate on the 2<sup>nd</sup> December 2021. The Inspectors issued preliminary and final matters, issues and questions (<u>INSP01</u>) in January 2021 and Matters and Issues Questions herby referred to as MIQs (INSP03 and revised <u>INSP03a</u>) in April 2022. The council is proposing making Main Modifications (MMs) to the Plan to resolve issues in order to make the Local Plan 'sound in line with National Planning Policy Framework paragraph 35. The proposed MMS can be found in Appendix A.
- Please note an Equality and Diversity Impact Assessment (EDIA) was prepared alongside the Local Plan Submission (<u>0D10</u>). Further EDIA may be required during the examination and a final EDIA will be published alongside the adopted Local Plan.

## 2. Summary of assessment

- The review of the Main Modifications is set out in Appendix A. It identifies the proposed change, the reasons for this, and whether the change(s) alters the conclusions of the submitted EDIA (0D10) and whether an additional assessment is required. The proposed MMs relate to the following principal changes:
  - Amendment to be in conformity with London Plan and/National Planning Framework and national Planning Policy Guidance.
  - Changes to the Plans period.
  - Changes for clarity and improve effectiveness.
  - To ensure the policy is justified.
  - Update in light of new evidence and/or new guidance.
- 1.5 The following MM was screened 'in' for this EDIA to assess its impact on the Protected Characteristics
  - MM 5.1 and MM5.1a Morden Wider town centre area
  - MM19.1 (New) Policy M19.1 Monitoring

### **EDIA Scoring matrix and screening**

1.6 This section assesses the proposed MMs against each of the nine Protected Characteristics. The Scoring Matrix is as before.

Figure 1: EDIA scoring matrix.

	Impact	Meaning	
Negative		Has a negative impact on an equality group or groups.	
Low		Has no impact or difficult to determine how the policy could affect an equality group or groups.	
Medium		Has some positive impact on an equality group or groups.	
High			

Figure 2: Assessment of the Screen in proposed MMs.

Proposed MM	Age	Disability	Sex/Gender	Race	Religion	Sexual Orientation	Gender reassignment	Marriage and Civil Partnership	Pregnancy and maternity	Implications for equality groups. (9 Protected Characteristics
MM 5.1 Morden wider town centre										The assessment has not identified an adverse impact on an equality group.
MM 5.1a Morden Wider town centre area							fgd			The assessment has found some positive impacts on one or more equality groups.
MM19.1: Policy M19.1 Monitoring (New policy)										The new policy will have a positive impact for all equality groups. As the policy will be monitoring the performance and effectiveness of the Plan.

# Appendix A: Screening of proposed Main Modifications (MMs)

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM1.1	14	1 <sup>st</sup> 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.	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	There are no implications for equalities groups.
MM1.2	32	Spatial vision, new bullet point	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.	Soundness: For compliance with national policy and to reflect the environmental Strategic Objectives set out on page 29.	May 2022 – response to Inspectors' MIQs.	There are no implications for equalities groups.
MM2.1	35	2.1.1	In accordance with Paragraph 149 of the NPPF 2019 and Paragraph 1523 of the Draft NPPF 2021, 'Plans should take a proactive approach to	To improve accuracy and demonstrate the soundness of the Local Plan with regards to the latest NPPF published July 2021.  Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors' Preliminary Letter March 2022	March 2022 - response to Inspectors' preliminary matters	There are no implications for equalities groups.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM2.1a	42	Policy CC2.2 Minimising Greenhouse Gas Emissions	1. Minimising Greenhouse Gas Emissions  We will require all proposed All development within the borough should seek to demonstrate that the fullest contribution to minimiseing greenhouse gas emissions has been made on site.  This will be achieved by requiring:  2. All development:  We will require:  3. All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:  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:  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 efficiently and cleanly  iii. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site  iv. Be seen: monitor, verify and report on energy performance  4. All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:	Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	May 2022 – response to the Inspector's MIQs	There are no implications for equalities groups
MM2.2	42	Policy CC2.2 Minimising	To provide an energy statement demonstrating how emissions savings have been maximised at	To ensure that the policy is justified and legally sound, all	March 2022 – response to	There are no implications for

Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
	Greenhouse Gas Emissions, part b	each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.	policy requirements to conform to guidance have been removed or amended.	Inspectors' preliminary matters	equalities groups
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	There are no implications for equalities groups
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	There are no implications for equalities groups
64	Policy CC2.5 (a-d)	5. Minimising Waste and Promoting Circular Economy  Merton Council will require allAll development proposals to should adopt a circular economy approach to building design and construction, and be designed for durability, flexibility and easy disassembly, 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:	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.	There are no implications for equalities groups
	43	Greenhouse Gas Emissions, part b  43 Footnote 3  48 2.2.17	Greenhouse Gas Emissions, part b  each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.  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.  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.  Folicy CC2.5 (a-d)  Policy CC2.5 (a-d)  Policy CC2.5 (a-d)  Merton Council will require allAll development proposals to should adopt a circular economy approach to building design and construction, and be designed for durability, flexibility and easy disassembly, to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbonThis will be achieved	Greenhouse Gas Emissions, part b  Emissions and interpreted a minimum improvement beyond part L of Building Regulations 2013. When Building Regulati	Greenhouse Gas Emissions, part b  each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.  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.  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 euggested carbon offset price will be updated in future guidance.  Folioy CC2.5 (a-d)  Policy CC2.5 (a-d)  Policy CC2.5 (a-d)  Footnote 3  Emissions, part b  accidence with the relevant guidance.  To improve clarity in response to the Inspector's MIQs.  To improve clarity in response to the Inspector's MIQs.  To improve clarity in response to the Inspector's MIQs.  To improve clarity in response to the Inspector's MIQs.  May 2022 – response to the Inspector's MIQs.  May 2022 – In response to the Inspector's MIQs.  Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's MIDs in response to the Inspecto

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			<ul> <li>a. To prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.</li> <li>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.</li> <li>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. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.</li> </ul>			
MM2.4	64	Policy CC2.5 (e)	e. To undertake a Whole Life-Cycle Carbon assessment proportionate to the scale of development and demonstrate that whole life-cycle carbon savings have been maximisedactions taken to reduce life-cycle carbon emissions.	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.	There are no implications for equalities groups
MM3.1	81	Colliers Wood: Policy N3.1, New part after f	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.	To be in general conformity with London Plan. Strategic Heights Diagrams have been introduced to show specific locations that are appropriate for tall buildings. The Strategic Height Diagrams		Changes relate to the London Plan. There are no implications for equalities groups.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
				provide a range of appropriate heights on the specific town centre locations.		
				The changes have been developed in consultation GLA officers, following the Mayor of London's Stage 3 response.		
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 varying height, forming a coherent cluster that enhances the wider Colliers Wood area.	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022 – response to Inspectors' Stage 1 matters INSP03	Changes relate to the London Plan. There are no implications for equalities groups.
			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'			

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM3.3	102	Site Allocation CW5, Design and accessibility guidance	Opportunity to improve connectivity across Colliers Wood and improve the condition of the Pickle Ditch. 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.	For clarity and accuracy and to maintain consistency with London Plan and National Policy.	May 2022 – response to Inspectors' MIQ.	Changes relate to the London Plan and the NPPF. There are no implications for equalities groups.
MM3.4	104	Site Allocation CW5, Impacts a designated open space	Yes, the western edge Parts of the site to the south are is Metropolitan Open Land (MOL) and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer.	For clarity and accuracy and to maintain consistency with London Plan and National Policy.	May 2022 – response to Inspectors' MIQ.	There are no implications for equalities groups. Changes made for clarity and accuracy and to maintain consistency with London Plan and National Policy.
MM4.1	119	Site Allocation Mi1 Benedict Wharf	Further information: The draft South London Waste Plan 2021-2036 2022-2037 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.  To improve accuracy and ensure soundness, the plan period for the SLWP has been updated, in line with the current EiP process.	March 2022	There are no implications for equalities groups
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,	Site allocation removed from a site appropriate for tall buildings at Stage 3	May 2022 – response to Inspectors'	There are no implications for equalities

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
		Approach to tall buildings	heritage and townscape.	(Reg 19). This text remained by accident.	Stage 1 matters INSP03	groups
MM5.1	173	Morden: Policy N5.1, KEY OBJECTIVES: MORDEN	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 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.  As the details of a possible	November 2021 – for submission	Screen in

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
				future Opportunity Area Planning Framework are still unknown, it is considered reasonable and justified to include the former WMTCA in the Merton Opportunity Area boundary.		
MM5.1a	177	Morden: Policy N5.1 part a	Development pPproposals for large sites (0.25 hectares and above) that assist contribute to 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	To improve clarity and accuracy of where the majority of new homes will be delivered.  Screen in
MM5.1b	182	5.1.18	There are also multiple other land ownership interests within the Morden Regeneration Zone and landowners are strongly encouraged to work together. and a ILand assembly strategy will be required to ensure that the 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, (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	There are no implications for equalities groups
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	For consistency with national policy.	May 2022 - in response to the Inspectors' MIQs.	There are no implications for equalities groups, Changes made for

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application. 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.			consistency to national policy.
MM5.2	202	Site Allocation Mo4, Site deliverability	Commencement within 5 years and delivery in phases within 105-15 years.	To ensure that the site allocation is 'justified'.	May 2022 – in response to the Inspectors' MIQs.	There are no implications for equalities groups.  Changes made to ensure the allocation is 'justified'.
MM9.1	268	Wimbledon: Policy N9.1, part j.	Securing improvements to public transport and (AM9.2) 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	There are no implications for equalities groups
MM9.2	268	Wimbledon Policy N9.1, new part after j	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,	For consistency with national policy and clarity.	November 2021 – for submission	Changes for consistency with national policy and

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			including through exploring the use of freight consolidation and last mile delivery solutions. New part added to ensure that the policy is consistent with national policy and to ensure the delivery of sustainable development, and to clarify that the transport strategy for Wimbledon will include reducing traffic dominance and managing deliveries and servicing. This will address matters raised in the submissions received from Love Wimbledon and Merton Residents Transport Group			clarity.  Changes will provide some benefits to equalities groups
MM9.3	281	Site Allocation Wi2	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.  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'	For further clarity on building heights and general conformity with the London Plan Policy.	March 2022 – response to Inspectors' preliminary matters  May 2022	There are no implications for equalities groups Changes provide clarity and conformity to the London Plan.
			and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.			
MM9.4	283 and 284	Site allocation Wi3	Move the following existing paragraph from "site description" on page 283 to "design and accessibility guidance" on page 284  The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden	To make the plan effective and in recognition of the Statement of Common Ground between LB Merton and LB Wandsworth, January 2022	May 2022 – response to the Inspectors' questions	There are no implications for equalities groups As text was already in the Plan.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			(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.			
MM9.5	284	Site allocation Wi3	Design and Accessibility guidance: 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.  Impacts listed buildings or undesignated heritage assets Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and	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	There are no implications for equalities groups As text was already in the Plan (see MM9.4)
			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"			
MM9.5a	284	Site allocation Wi3, new paragraph under Infrastructure requirements	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.	For clarity and consistency with national policy.	May 2022 – response to the Inspectors' MIQ.	No change to HRA findings. For clarity and consistency with national policy.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM9.6	308	Site Allocation Wi12	Approach to tall buildings Development of the site could include taller buildings 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'.	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022	There are no implications for equalities groups. Change made to be in conformity with the London Plan and does not reflect a change direction of the Plan.
MM11.1	333	H11.1	Strategic 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	There are no implications for equalities groups This is a factual change.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM11.2	334	Policy H11.1 (f) Table	Threshold (gross) Affordable housing tenure split 10 or more homes 70% Low-cost rent 30% Intermediate (Including a minimum of 25% First Homes) 2-9 homes 70% Low-cost rent 30% Intermediate (Including a minimum 25% First Homes)	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  Changes made to comply more effectively with the PPG on First Homes and to improve clarity.
MM11.4	339	New paragraph following Figure 4.1.3 and before paragraph 11.1.12	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.	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  Changes made to comply more effectively with the PPG on First Homes and to improve

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
						clarity.
MM11.5	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). 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.	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  Changes made to comply more effectively with the PPG on First Homes and to improve clarity.
MM11.7	341	Paragraph11.1.19	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, 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).	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  Change ensure consistency with the NPPF and conformity with the London Plan.
MM11.8	342	Paragraph11.1.23	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).	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  Change

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
						ensure consistency with the NPPF and conformity with the London Plan.
MMXXX	345	New paragraph following paragraph 11.1.38	Securing M4(2) and M4(3) dwellings  New supporting paragraph (following paragraph 11.1.38): 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.	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022- response to Inspectors' Matters, Issues and Questions	Positive impact on the equality groups.  Due to the need to in compliance with national PPG.
MM11.9	345	New paragraph following paragraph 11.1.38	NEW PARAGRAPH: 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.	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022- response to Inspectors' Matters, Issues and Questions	Positive impact implications for some equalities groups.  Change made to be in compliance with national PPG.
MM11.1	346	H11.2	Strategic policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	May 2022- response to Inspectors' Matters, Issues and	There are no implications for equalities groups.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM1.1	346	H11.2	We will aim to deliver a minimum of 41,732 11,374 additional homes for the period 2022/23 - 2036/37 2021/22 - 2035/36.	See above - initial MM1.1 at Page 14  Formerly AM11.4. Moved to Main Modifications in response to Inspectors preliminary letter, March 2022	Questions  March 2022 response to Inspectors' preliminary matters	change. There are no implications for equalities groups. Factual change.
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 and having regard to 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 to response to Inspectors' preliminary matters	Some positive implications for equalities groups.
MM1.1	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 41,732 11,374 additional homes for the period 2021/22 – 2035/36 2022/23 – 2036/37 will come forward in Merton by:	See above - initial MM1.1 at Page 14  Formerly AM11.4. Moved to Main Modifications in response to Inspectors preliminary letter, March 2022	March 2022 – response to Inspectors' preliminary matters	There are no implications for equalities groups.  Change is factual.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM1.1	347	Supporting new paragraph after 11.2.4	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.	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. Moved to Main Modifications in response to Inspectors preliminary letter, March 2022	March 2022 – response to Inspectors' preliminary matters	There are no implications for equalities groups.
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	There are no implications for equalities groups.  Change is factual
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 and includes the rolling forward of the small sites target beyond 2029. This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to 2036/37 2035/36 of 1,644 1,096 as indicated in the following table:			There are no implications for equalities groups.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			Plan period Target  2029/30 - 2033/34 2,370  2034/35 - 2036/37 2035/36 1,644 1,096  2029/30 - 2036/37 2035/36 4,014 3,466			
MM1.1	348	11.2.7 and Figure 4.2.2	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 2021/22, increasing to 950 for the period 2024/25 – 2026/27 2023/24, and then increase to 1,080 1,555 for 2027/28 – 2028/29the 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.	See above - initial MM1.1 at Page 14  Formerly AM11.8. Moved to Main Modifications in response to Inspectors preliminary matters	March 2022 – response to Inspectors' preliminary matters  Further corrections submitted 11 March 2022.	There are no implications for equalities groups.
MM1.1	349	Figure 4.2.1	Figure 11.2.1 'Merton Housing Trajectory 2022/23 – 2036/37' updated – refer to Appendix 2	See above - initial MM1.1 at Page 14 Formerly AM11.10. Moved to Main Modifications in response to Inspectors preliminary matters	March 2022 – response to Inspectors' preliminary matters	There are no implications for equalities groups.
MM11.1 1	366	Policy H11.6 e	The suitability of ground conditions, particularly in respect to the potential to flooding. Please also refer to policies contained in Chapter 15 (Green and Blue Infrastructure) including policies F15.7; F15.8 and F15.9.	To improve clarity and link it relationship with other policy areas of the Plan in response to MIQs	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  Wording is proposed to be amended for clarity and the

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
						changes do not change the direction of the plan.
MM11.1 2	366	Policy H11.6 f	The need or demand for accommodation provision and the available capacity on existing sites in the borough.	To improve clarity and link it relationship with other policy areas of the Plan in response to MIQs	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups. Deletion provides clarity.
MM11.1 3	366	Policy H11.6	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.	To improve clarity and link it relationship with other policy areas of the Plan in response to MIQs	May 2022. Response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  Additional wording not relevant to HRA conclusions but are environmentall y positive.
MM11.1 4	368	New supporting para following existing para 11.6.6	New para: 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.	To improve clarity and soundness of the Plan in response to MIQs	May 2022- response to Inspectors' Matters, Issues and Questions	There are no implications for equalities groups.  The wording is proposed to be

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM13.1	449	13.3.9	13.3.9 In circumstances where proposals for mixed	To improve clarity and	May 2022.	amended for clarity and soundness. The changes do not alter the direction of the Plan. So there is no change to the impact on European site.  There are no implications for
а			use development are considered, proposals must be designed to ensure the future occupation and function of employment uses, upon completion. 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. The premises/sites retained for employment uses must:	effectiveness	Response to the Inspectors questions	implications for equalities groups.  The subject matter was already in the Plan. Additional wording does not change the direction of the Plan. It improves clarity and effectiveness.
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:	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	There are no implications for equalities groups.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM13.2	457	13.5.8	<ul> <li>ia. Provide a range of commercial unit sizes;</li> <li>iib. Provide a wide range of town centre type uses which contribute towards the vitality and viability of town centres including shopping, leisure, entertainment, cultural, community and offices.</li> <li>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.</li> <li>Within Local town centres</li> <li>a4. Supporting proposals:         <ul> <li>c. that do not provide betting shops within the primary shopping area.</li> </ul> </li> <li>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 within the primary shopping</li> </ul>	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	There are no implications for equalities groups.
			area <u>of Merton's town centres</u> .			The change reflects the amendment to MM13.1 which is considered separately above. Wording provides clarity and effectiveness.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM13.3	464	Policy TC 13.6	2. The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment (required over 280sqm net new floorspace) submitted is proportionate to the scale of the development proposed and satisfies the council's requirements.	Positively prepared and consistent with national policy.	May 2022 – response to the Inspectors questions	No change to HRA findings: The wording is positively prepared and consistent with national policy.
MM13.4	465	13.6.5 (first sentence)	Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area of the new proposal exceeds 280sqm.	Clarity and justification	May 2022 – response to Inspectors matters, issues and questions.	There are no implications for equalities groups.  Wording provides clarity and justification.
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.	No change to HRA finding. Wording provides consistency with national planning policy.
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. Where basements	To ensure the Local Plan is justified and effective.	May 2022 – response to Inspectors matters, issues and questions.	No change to HRA findings: The wording ensures the Plan is justified and effective.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			discharge to the sewer network, they must install suitable positively pumped devices.			
MM15.0	505	New paragraphs after 5.1.2	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 Inspectors' matters issues and questions.	No change to HRA findings. Wording is consistence with national planning policy.
MM15.1	511	Policy O15.3 (d)	Require development to contribute to net gains in  Belodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and	Agreed with the Environment Agency in Statement of Common Ground. Added as	November 2021 – submission	There are no implications for equalities

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links.  Where development is adjacent to or includes a river, natural banks must be restored with a 10m buffer included.	AM15.6	(added as AM15.6)	groups.
MM15.2	544	Policy P15.10 Improving Air Quality and Minimising Pollution	g. Development proposals must consider the impact of air quality. An AQA will be required for proposals introducing new developments in areas already subject to poor air, 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:	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	There are no implications for equalities groups. The wording provides clarity and do not change the direction of the Plan.
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. In determining the contribution, the Council will refer to the London Plan Air Quality Neutral guidance (section 5).	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	There are no implications for equalities groups.  The wording provides clarity and do not change the direction of the Plan.
MM15.4	549	Policy P15.10 Improving Air	New Para: The Council will apply London Plan	Following review of the policy in light of MIQs – the council		There are no implications for

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
		Quality and Minimising Pollution	policy SI1 Improving air quality to all 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.	propose making the MM for clarity.	Issues Question (MIQs) from the Planning Inspector	equalities groups.  The wording provides clarity and do not change the direction of the Plan.  The change reflects the amendment to MM 15.3 which is considered separately above.
MM15.5		Policy P15.10 Improving Air Quality and Minimising Pollution	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.	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	There are no implications for equalities groups.  The wording provides clarity and do not change the direction of the Plan.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
MM15.6	15.109	Policy P15.10 Improving Air Quality and Minimising Pollution	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 (AQNPSD).	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	There are no implications for equalities groups. The change reflects the amendment to MM 15.3 which is considered separately above.
MM15.7		Policy P15.10 Improving Air Quality and Minimising Pollution	New paragraph  The whole of Merton is designated an Air Quality  Management Area (AQMA) and has three Air	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	There are no implications for equalities groups.  The wording

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			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).  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.		Inspector	provides clarity and do not change the direction of the Plan.
MM15.8	After para 15.10.	Policy P15.10 Improving Air Quality and Minimising Pollution	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	Following review of the policy in light of MIQs – the council propose making the MM for clarity.		There are no implications for equalities groups.  Changes are for clarity and do not change the direction of

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			an Air Quality Management Area (AQMA) for last two decades.			the Plan.
			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.			
15.9		Policy P15.10 Improving Air Quality and Minimising Pollution	New paraConsideration 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 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	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022	There are no implications for equalities groups.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			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		Air Quality Neutral and Positive  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	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. There are no implications for equalities groups.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			Planning Support Document (AQNPSD).			
MM16.1	560	Para 16.1.2	As set out in tThe Mayor's Transport Strategy and the Government's Decarbonising Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce set out the overarching policy framework and strategic approach to transport which focuses on reducing dependency on cars in favour of active, efficient and sustainable modes of travel.	Additional reference to newly published Decarbonising Strategy and associated wording amendment.	May 2022	There are no implications for equalities groups.  The direction of the policy has not changed. Changes made to reflect the latest evidence.
MM16.2	563	T16.2d	Provide secure, covered <u>and well-designed</u> cycle parking <u>facilities that meet or exceed London Plan standards (higher level minimum requirements) in accordance with London Plan minimum standards (higher level) and London Cycle Design Standards.</u>	Amendment made as proposed by TfL Spatial Planning and to ensure consistency with London Plan policy T5 A 2 which states that "Developments should provide cycle parking at least in accordance with the minimum standards."	November 21, 2021. March 22. Response to Inspectors preliminary matters	There are no implications for equalities groups.  Changes made to be in conformity with the London Plan.
MM16.3	574	16.4.14	The Government has published a decarbonising transport strategy which includes proposals to increase the uptake of electric vehicles (EVs) and	Supporting text amended and updated to include reference to the	November 2021 for submission –	There are no implications for equalities

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
			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.	Government's recently published decarbonising transport strategy.	was previously AM16.23	groups.  The direction of the policy has not changed. Changes made to reflect the latest evidence.
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. 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. 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 attempt to meet both the building regs requirement and the London Plan 20% standard by allocating charge points first to units		There are no implications for equalities groups.  The direction of the policy has not changed. Changes made to reflect the latest evidence. The change reflects the amendment to MM16.3 which is considered separately above.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
				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	Schedule of Main Modifications	To improve clarity regarding which adopted policies are superseded by the Local Plan and to ensure the effectiveness and regulatory compliance of the Local Plan.	March 2022 – response to Inspectors' preliminary matters	There are no implications for equalities groups.  This for effectiveness and regulatory compliance of the Local Plan.
MM18.2	641	New glossary term after Convenience Retailing	Conversion The conversion of existing single dwellings into two or more smaller dwellings.	To improve clarity in response to the Inspector's MIQs.	May 2022 – response to Inspector's MIQs.	There are no implications for equalities groups.  The change provides clarity.
MM- MOL Ma p-01a	Мар	Policies Map – Metropolitan Open Land	Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-3).	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	November 2021 – for submission	There are no implications for equalities groups.  Ensures the Plan is

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
				Plan and officers consider that their inclusion in 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'. Refer to maps below.		justified. Please refer to maps below.
MM- MOL Ma p-01b	Мар	Policies Map – Metropolitan Open Land	Slight boundary amendments around the Eveline Day Nursery SW20 9NA from Lower Morden Metropolitan Open Land (MOL-3).	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'.  Refer to maps below.	November 2021 – for submission	There are no implications for equalities groups.  Ensures the Plan is justified. Please refer to maps below.
MM- Open Space M ap-02	Мар	Policies Map – Open Space	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).	This site contains 4 residential properties which do not form part of the adjoining cemetery. They do not meet the Open Space criteria set out in the Merton Green Infrastructure Study 2020. Officers consider that their inclusion in the Open Space designation is an anomaly and they should be removed. The modifications ensure that the Local Plan is	November 2021 – for submission	There are no implications for equalities groups. Ensures the Plan is justified. Please refer to maps below.

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
				'justified'.  Refer to map Appendix 1 for details.		
MM- Open Space M ap-03	Мар	Policies Map – Open Space	Remove part of Tooting and Mitcham Imperial Sports Ground from Open Space (P028), in accordance with approved planning application 19/P4094.	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'.	2021 – for submission	There are no implications for equalities groups.  Ensures the Plan is justified. Please refer to maps below.
MM- Open Space M ap-04	Мар	Policies Map – Open Space	Remove part of the Eastfields estate site owned by Clarion Housing Group from Streatham Park Cemetery Open Space (C004).	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'.  Refer to map Appendix 1 for details.	November 2021 – for submission	No change to HRA findings. Ensures the Plan is justified. Please refer to maps below.
MM-	Мар	Policies Map –	Remove part of the Long Bolstead Recreation	In accordance with approved	November	There are no

Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
	Open Space	Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).	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'.	2021 – for submission	implications for equalities groups.  Ensures the Plan is justified. Please refer to maps below.
Мар	Policies Map – Sites of Importance for Nature Conservation	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.	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	November 2021 – for submission	No change to HRA findings. Ensures the Plan is justified. Please refer to maps below.
Мар	Policies Map –	Myrna Close SINC (MeBII10) - The SINC	In accordance with approved	November	There are no
	Мар	Map Policies Map – Sites of Importance for Nature Conservation	Open Space  Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).  Map  Policies Map — Sites of Importance for Nature Conservation  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.	Open Space  Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).  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'.  Map Policies Map — Sites of Importance for Nature Conservation  Mature Conservation  Map Policies Map — Sites of Importance for Nature Conservation  Map Policies Map — Sites of Importance for Nature Conservation  Map Policies Map — Sites of Importance for Nature Conservation  Map Policies Map — Sites of Importance for Nature Conservation Sites of Importance for Nature Conservation  Map Policies Map — Sites of Importance for Nature Conservation Sites of Importance	Open Space  Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).  Policies Map—Sites of Importance for Nature Conservation  Mature Conservation  Policies Map—Sites of Importance for Nature Conservation  Open Space  Ground owned by Clarion Housing Group from 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".  Reviewed following Stage 3 Local Plan response and ther wildlife interest.  Reviewed following Stage 3 Local Plan response and tholds 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 Council's Ecologist. The modifications ensure that the Local Plan is "justified".

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
SINC Ma p-06		Sites of Importance for Nature Conservation	boundary needs to be amended in accordance with approved planning application 16/P3430.	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'.	2021 – for submission	implications for equalities groups.  Ensures the Plan is justified. Please refer to maps below.
MM- Green Corridor Map-07	Мар	Policies Map – Green Corridor	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.	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	There are no implications for equalities groups.  Ensures the Plan is justified. Please refer to maps below.
MM- APZs- Map-08	Мар	Policies Map – Archaeological Priority Zones	Removed the map showing Archaeological Priority Zones from the Policies Map.	For accuracy and to ensure that the Local Plan is 'justified', this data has been removed because it has been superseded by Archaeological Priority Areas	November 2021 – for submission	Ensures the Plan is justified. Please refer to maps below.

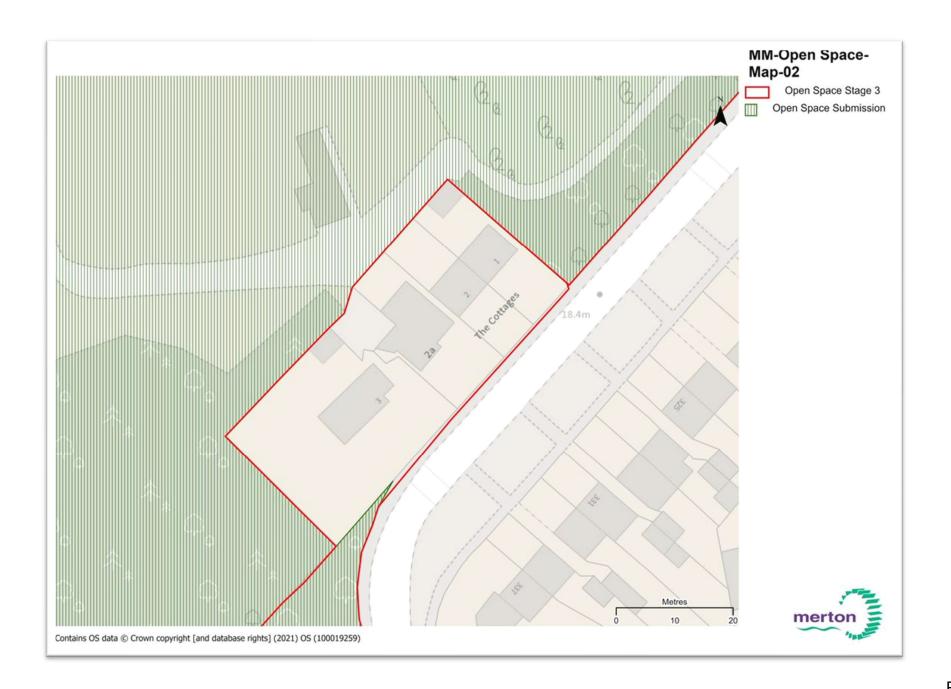
MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
				according to the latest information from Historic England.		
MM- Conserv ation Areas- Map-09	Мар	Policies Map  Conservation  Areas	Added labels to the map showing the Conservation Area codes and also a table below the legend with the name of each of the Conservation Areas	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	Ensures the Plan is justified. Please refer to maps below.
MM- Listed Building s-Map- 10	Мар	Policies Map Listed Buildings	Updated to provide the latest information.	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	There are no implications for equalities groups.  Update ensures the Plan is
						justified. See maps below. Please refer to maps below.
MM- Locally Listed Building s-Map- 11	Мар	Policies Map  Locally Listed  Buildings	Updated to provide the latest information.	For accuracy this map has been updated with the latest information from Merton Council. This modification ensures that the Local Plan is "justified".	November 2021 – for submission	No change to HRA findings. Update ensures the Plan is justified. See maps below.
MM-	Мар	Policies Map	New map to highlight the cycle routes that are part	Refer to map Appendix 1 for details.  For clarity the cycle network	November	Please refer to maps below.  There are no

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for equality groups. (9 Protected Characteristics
Wandle Cycle Route- Map-12		Wandle Cycle Route	of the Wandle Trail	that is part of the Wandle Trail has been added as a separate map to highlight its importance in enabling active travel choices. This change was requested at the Stage 3 consultation from the Wandle Valley Forum.		implications for equalities groups.  Additional information provides clarity.
MM- Merton- Cycle Network -Map13	Мар	Policies Map New map	Cycle network routes have been updated to show the Wandle Missing Link	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	There are no implications for equalities groups.  Additional information provides clarity.
MM19.1	After page 665	Insert new policy M19.1 Monitoring	Refer to Appendix 3 for new policy wording	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.  See assessment above  There are no implications for equalities groups.

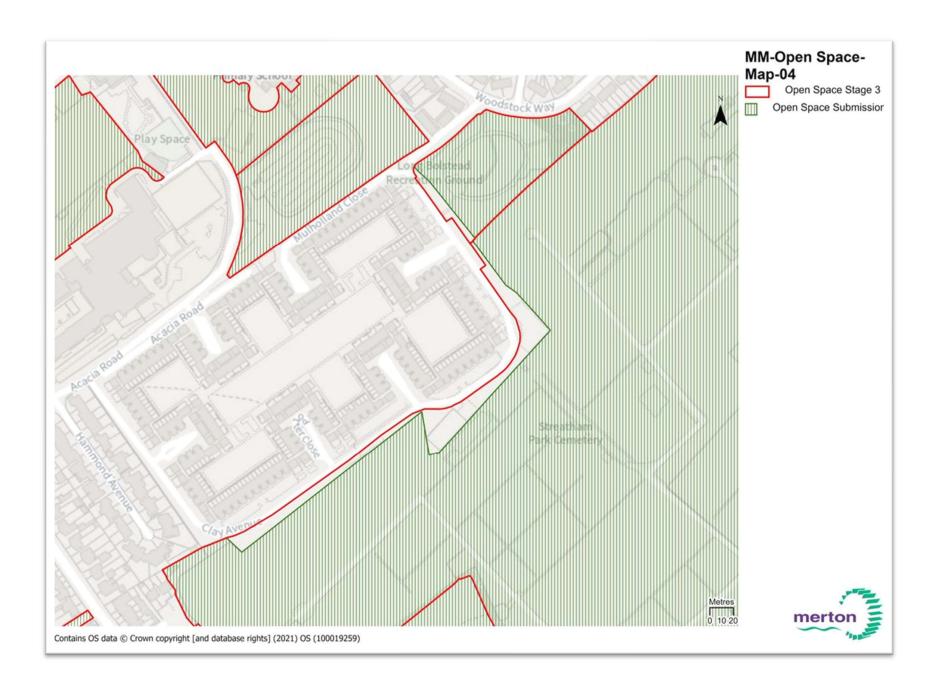
- 1.1 It should be noted that the council does not propose to remove any individual site of MOL in its entirety. As illustrated on the Policies Map (Document 0D2), there are 9 MOL sites within the borough, totalling over 960 hectares. The 12 MOL boundary amendments proposed through this Plan are minimal 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.
- The proposed MOL boundary changes through this Plan result in a di 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).
- 1.3 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.

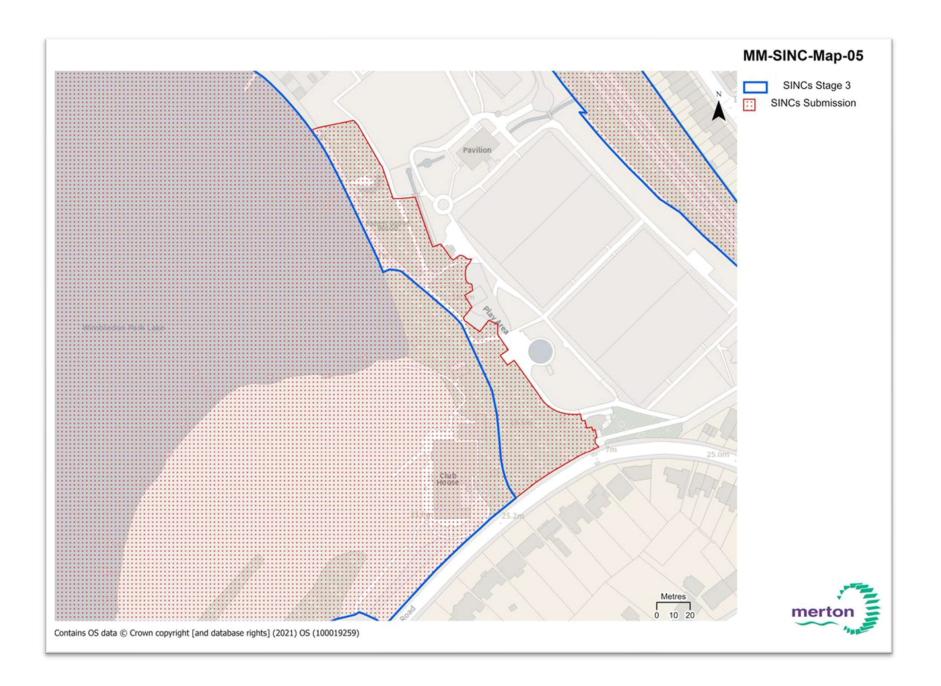


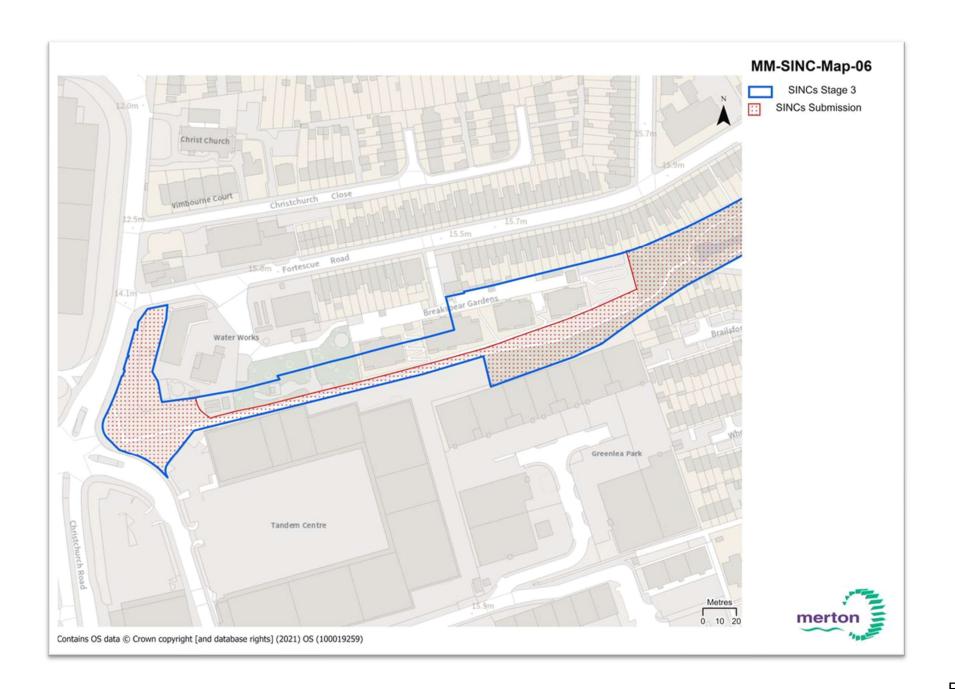






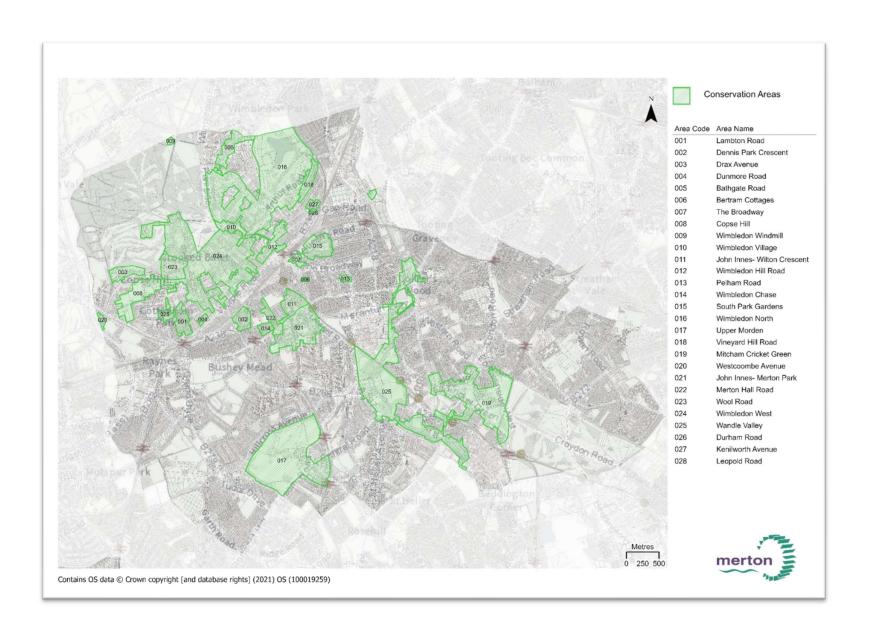




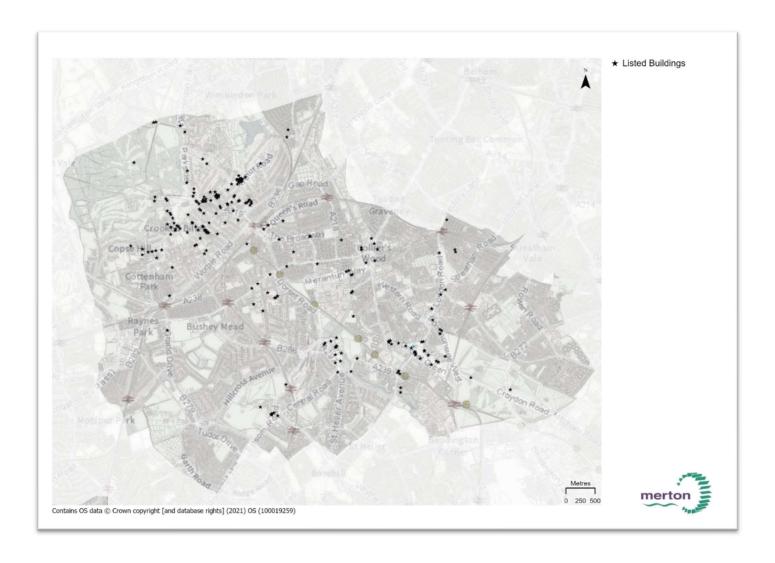




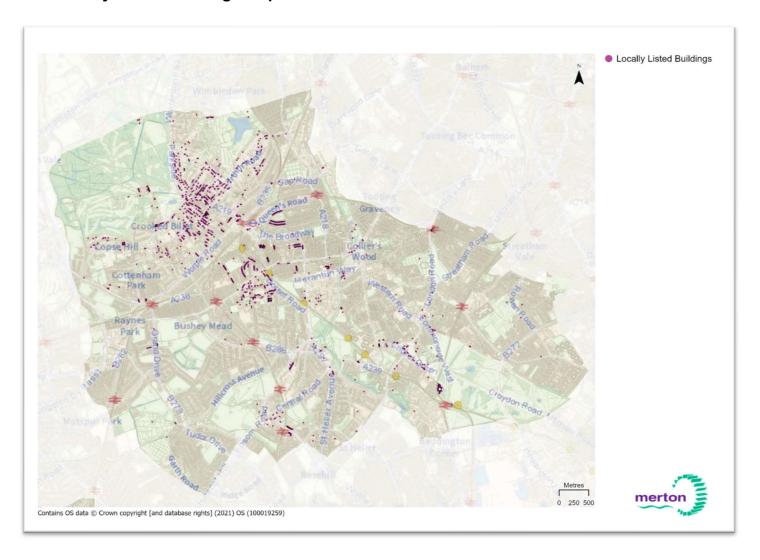
**MM-Conservation Areas-Map-09** 



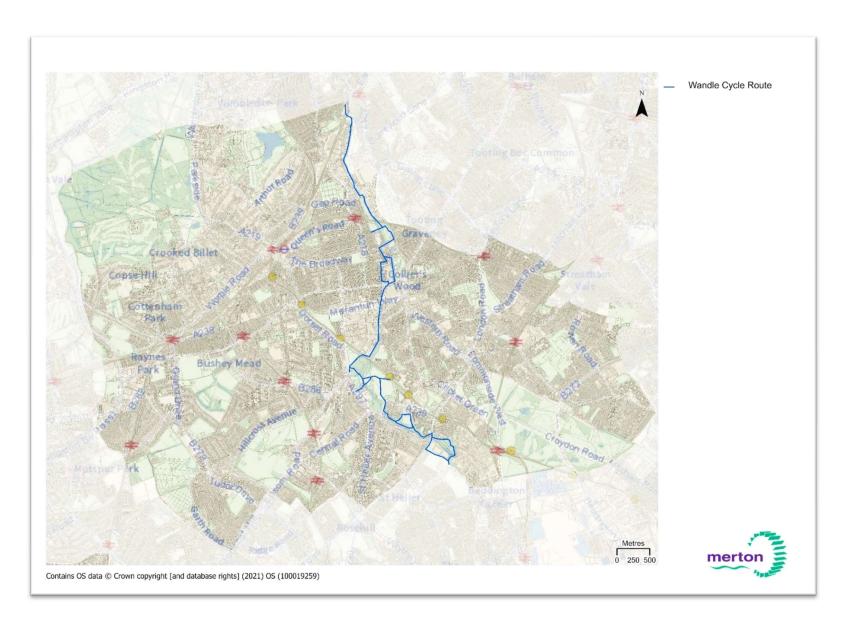
# MM-Listed Buildings-Map-10



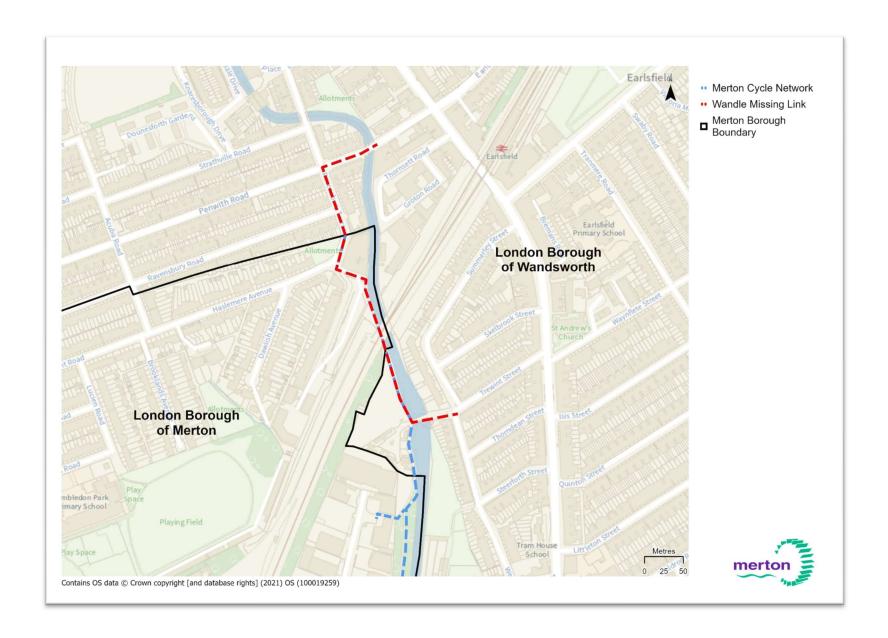
# MM-Locally Listed Buildings-Map-11



MM-Wandle Cycle Route- Map-12



MM-Merton-Cycle Network-Map13



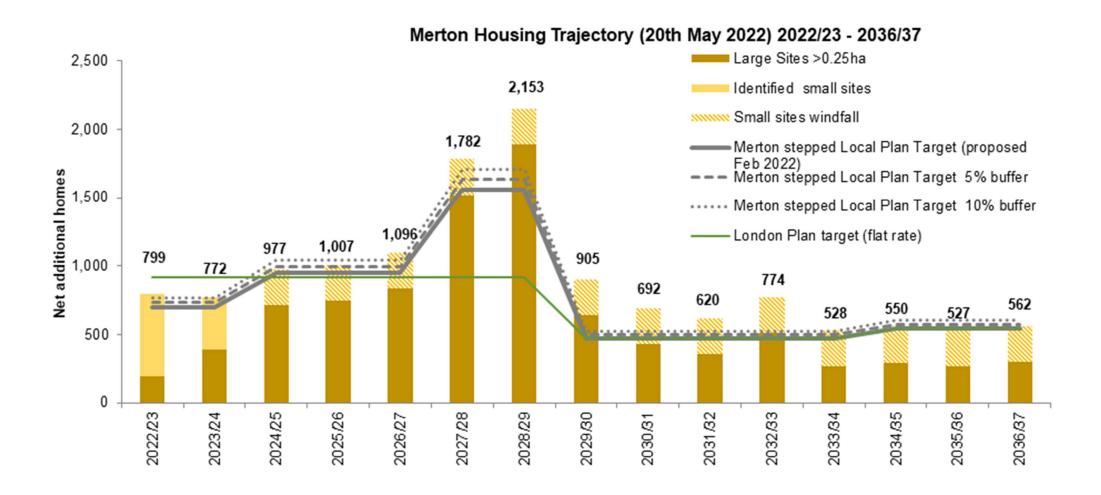
### Page 348 - Figure Paragraph 11.2.7 and Figure 4.2.2 Merton's stepped housing delivery target (MM1.1)

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 2021/22, 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.

	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	Shortfal	Total
Merton Local Plan target	775 750	775 700	<del>775</del> 700	1,080 950	<del>1,080</del> <u>950</u>	1,080 950	1,350 1,555	<del>1,350</del> <u>1,555</u>		8265 7,360
London Plan target	1,033 918	<del>1,033</del> <u>918</u>	<del>1,033</del> <u>918</u>	<del>1,033</del> <u>918</u>	<del>1,033</del> <u>918</u>	<del>1,033</del> <u>918</u>	1,033 918	<del>1,033</del> <u>918</u>	<u>928</u>	8265 6,426

Figure 11 4.2.2 Merton's stepped housing delivery target

Page 349 (MM1.1)- Figure 11.2.1 Merton's Housing Trajectory for the Plan period 2022/23 to 2036/37



### 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.
- 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.
- 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**

Thematic area	Monitoring indicator	Target (if applicable)
Growth Area (Opportunity Area)	London Plan indicative target (up to	Cumulative housing completions
	2041) to deliver 5,000 new homes and	since OA designation.
	6,000 jobs (indicative figure).	
		Cumulative non-residential floorspace
		approvals and completions since OA
		designation.
<u>Air quality</u>	Number of days p.a. when air pollution	Decreasing number of days of high
	is moderate or high for PM10*	PM10 over a 3-year period.
To reduce emissions and		
concentrations of harmful	*Daily mean particles (PM10) not to	
atmospheric pollutants, particularly	exceed 50 micrograms per cubic metre	

Thematic area	<b>Monitoring indicator</b>	Target (if applicable)
in areas of poorest air quality and	- more than 35 times a year at any	
reduce exposure.	measuring site.	
<u>Biodiversity</u>	Changes in areas of biodiversity	No net loss of sites of importance for
	importance.	nature conservation (SINCS).
To protect and conserve Merton's		
biodiversity from adverse		
development, avoid damage and		
irreversible losses to designated		
sites and protected species, adding		
to the abundance of non-designated		
biodiversity features and habitats		
(such as trees, gardens, green roofs		
and other features).		
Land and soil condition and	Planning permissions granted contrary	NO PLANNING PERMISSIONS GRANTED CONTRARY TO ENVIRONMENT AGENCY
<u>pollutants</u>	to Environment Agency advice on	ADVICE ON FLOOD RISK AND WATER
	flooding and water quality grounds.	QUALITY GROUNDS.
To conserve Merton's geodiversity		
and protect soils from development		
and over intensive use.		
		0-20
Sustainable land use	<u>Planning permissions granted and</u>	95% of major planning permissions
	completed.	started within a 3 year period.
To make the best and most efficient		
use of land to support sustainable		
patterns and forms of development.		
Heritage (including architectural	Number of heritage assets on Historic	A reduction in the number of heritage
		A reduction in the number of heritage
and archaeological heritage)	England's Heritage at Risk Register.	assets on the Heritage at Risk
To conserve and enhance the		<u>register.</u>
existing historic and built		
environment, including sites,		
features, landscapes and areas of		
<u>leatures, lanuscapes and areas or</u>		

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

Thematic area	Monitoring indicator	Target (if applicable)
Embodied Carbon  To manage and reduce embodied carbon.	Embodied carbon (kgCO2/m2) from large developments which submit a Whole Life Cycle Assessment	Best practice
BREEAM  To achieve a holistic approach to sustainable design and construction.	Monitoring changes to industry standards for sustainable design and construction.	Monitoring and updating the Local Plan as required.
Noise and vibration  To minimise noise, vibration levels and disruption to people and communities.	An increase in area of the Noise Action planning important areas.	No increase to area.
Water quality  To protect and enhance Merton's water bodies.	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.  River water bodies classified under the Water Framework Directive to achieve good ecological status.	No planning permissions granted against Environment Agency recommendations.  No decrease of the Water Framework Directive classification of 'good' ecological status.
Water consumption  Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.  Number and location of water pollution	No planning permissions granted against Environment Agency recommendations.
	incidents reported to the Environment Agency across Merton annually.  Water quality status of water bodies across borough.	

Thematic area	Monitoring indicator	Target (if applicable)
	Proportion of new residential	
	developments with a maximum water	
	consumption target of 105	
	litres/person/day.	
Open space and nature	Net loss of designated open space for	No net loss of designated open
	<u>development.</u>	space.
To protect, connect and enhance		
Merton's natural environment	Metres of main river improved and	
(including important habitats,	restored across Merton.	
species and landscapes) and the		
services and benefits it provides,	Biodiversity Net Gain delivered across	
delivering a net positive outcome	Merton.	
<u>for biodiversity.</u>		
Sustainable transport	Overall sustainable mode share.	Increase in overall sustainable mode
		share based on a rolling three year
To enhance and improve	Uptake of low emission vehicles.	average.
connectivity for all and increase the		
proportion of journeys made by		Increase in registered EV vehicles in
sustainable and active transport		Merton – measured annually.
modes.		
Health and wellbeing	<u>Delivery of healthcare facilities</u>	n/a (Monitoring will be reported in the
	identified in Merton's Local Plan.	Health and Wellbeing Strategy
To facilitate and improve the health		annual update known as the Merton
and wellbeing of the population,	Number of people taking up physical	Story and added to the AMR.)
reduce health inequalities and	activities and stating they are in 'good	
deliver safer and more secure	<u>health.'</u>	All development proposals that meet
communities.		the Local Plan policy requirements to
	Number of Health Impact Assessments	submit a Health Impact Assessment.
	(HIA) carried out.	
		D. II II
<u>Housing</u>	Progress against borough wide	Building regulation M4(3) – 10% of all
	affordable housing targets.	new build self-contained homes.

Thematic area	Monitoring indicator	Target (if applicable)
To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic changes and local housing demand.	Number of homes built each year.	M4(2) – 90% of all new build self-contained homes.  50% of new homes borough wide to be affordable across the plan period.
		Of affordable homes, 70% to be low-cost rent  30% to be intermediate tenure.
Safe environments  To contribute to safe and secure environments for all people including people with Protected Characteristics.	Number of Health Impact Assessments carried out and type of development.	Health Impact Assessments carried out for all developments required by policy.  Increase in % of people feeling safe as measured in Merton Residents Survey.
		Yearly decrease in serious crime and crime against people with Protected Characteristics.
Infrastructure  To ensure that environmental, social and physical infrastructure is managed and delivered to support demographic change.	Delivery of infrastructure projects identified in the Infrastructure Delivery Plan.	Number of infrastructure projects delivered.
Design  To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are	Increase in number of major schemes reviewed by the Design Review Panel at pre – application stage.	% of planning appeals allowed by the Planning Inspector for applications originally refused for design reasons by the council.

Thematic area	Monitoring indicator	Target (if applicable)
appropriately designed and		
accessible, which promote and		
enhance a sense of place and		
distinctiveness, reducing the need		
to travel by motorised transport.		
<u>Local employment</u>	Number of people unemployed.	% of people unemployed lower than
	Number of new jobs created.	regional and national averages.
To develop and maintain a healthy		
labour market.		Increase in number of new jobs created.
Education and skills	Development of floorspace to meet the	Delivery of necessary education
	needs for pupil places.	<u>floorspace</u>
To ensure the education and skills		
provision meets the needs of	Number of 16- 24-year-olds in training	Yearly increase in the number of
Merton residents existing and future	or apprenticeships or work	apprenticeships or work programmes.
labour market and improves life	programmes.	
chances for all, including people		All major developments to provide
with disabilities and Black, Asian	Number of local people employed or in	local people with employment and/or
and other minority ethnic groups.	training as part of large or regeneration	training opportunities.
	developments.	
Economic growth and town centres	Undertake the shopping survey to	Maintain the retail vacancy rate below
To increase the vitality and viability	measure the retail vacancy rate in  Merton's town centres below national	national and regional averages in Merton's town centres.
of existing town centres, local	and regional rates.	Merton's town centres.
centres and parades.	and regional rates.	
centres and parades.		No net loss of employment floorspace
To ensure a sufficient supply	Maintain the industrial vacancy rate	in Strategic Industrial Locations.
premise to meet demand for	below national and regional averages.	Stategie massiai 255aiono.
industry, logistics and services.		

## After page 665 (MM18.1)

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

Core Planning Strategy policies	Replaced by forthcoming Policies in the Local Plan (submitted 2 <sup>nd</sup>
	December 2021)
Issues and options.	Good growth chapter
Merton's Core Strategy Spatial Vision.	Chapter 01c: Urban development objectives and vision.
Key Diagram (Figure 8.1 Key Diagram).	Figure 1: Merton's spatial strategy.
Policy CS 1 Colliers Wood.	Policy N3.1: Colliers Wood.
Policy CS 2 Mitcham Town Centre.	Policy N4.1 Mitcham.
Policy CS 3 Morden Town Centre.	Policy N5.1; Morden.
Policy CS 4 Raynes Park Local Centre.	Policy N6.1: Raynes Park.
Policy CS 5 Wandle Valley.	Policy O15.6 Wandle Valley Regional Park.
Policy CS 6 Wimbledon Town Centre.	Policy N9.1: Wimbledon.
Policy CS 7 Centres.	Strategic policy EC13.1 Promoting economic growth and successful high
	streets.
Policy CS 8 Housing Choice.	Strategic Policy H11.1 Housing choice
Policy CS 9 Housing Provision.	Strategic Policy H11.2 Housing provision
Policy CS 10 Accommodation for Gypsies and Travellers.	Policy No. H11.6 Accommodation for Gypsies and Travellers.
Policy CS 11 Infrastructure.	Strategic policy IN 14.1 Infrastructure.
Policy CS 12 Economic Development.	Strategic policy EC13.1 Promoting economic growth and successful high
	streets.
Policy CS 13 Open space, nature conservation, leisure and	Strategic Policy O15.1 Open Space, Green Infrastructure and Nature
<u>culture.</u>	Conservation.
Policy CS 14 Design.	Strategic Policy D12.1 Delivering well-designed and resilient
	neighbourhoods.
Policy CS 15 Climate Change.	Strategic Policy CC2.1: Promoting Sustainable Design to Mitigate and
	Adapt to Climate Change.
Policy CS 16 Flood Risk Management.	Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage.
Policy CS 17 Waste Management.	Strategic Policy W14.4 Waste Management.
Policy CS 18 Active Transport.	Strategic Policy T16.1 Sustainable Travel.

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

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

Sites and Policies Plan policies	Replaced by forthcoming Policies in the Local Plan (submitted 2 <sup>nd</sup>
	December 2021)
DM R1 Location and scale of development in Merton's town	Policy TC 13.5 Merton's town centres and neighbourhood parades.
centres and neighbourhood parades.	
DM R2 Development of town centre type uses outside town	Policy TC 13.6 Development of town centre type uses outside town centres.
<u>centres.</u>	
DM R3 Protecting corner/ local shops.	Policy TC13.7 Protecting corner / local shops
DM R4 Protection of shopping facilities within designated	Policy TC 13.5 Merton's town centres and neighbourhood parades.
shopping frontages.	
DM R5 Food and drink / leisure and entertainment uses.	Policy TC13.8 Food and drink / leisure and entertainment.
DM R6 Culture, arts and tourism development.	Policy TC13.9 Culture, arts and tourism development.
DM R7 Markets.	Policy not taken forward.
DM H1 Supported care housing for vulnerable people or	Policy No. H11.4 Supported care housing for vulnerable people or secure
secure residential institutions for people housed as part of the	residential institutions for people housed as part of the criminal justice system.
<u>criminal justice system.</u>	
DM H2 Housing mix.	Policy No. H11.3 Housing mix
DM H3 Support for affordable housing.	Policy No. H11.1 Housing choice
DM H4 Demolition and redevelopment of a single dwelling	Policy not taken forward.
house.	
DM H5 Student housing, other housing with shared facilities	Policy No. H11.5 Student Housing, other housing with shared facilities and
and bedsits.	<u>bedsits</u>
DM C1 Community facilities.	Policy IN14.2
	Social and Community Infrastructure
DM C2 Education for children and young people.	Policy IN14.2 Social and Community Infrastructure

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