



Habitat Regulation Assessment Report on the Main Modifications of the Local Plan

May 2022

1 Summary

- 1.1. Merton Council submitted the borough's Local Plan hereby referred to as the Plan, to the Secretary of State for examination on 2nd December 2021. A Habitat Regulations Assessment (HRA) Report 2021([0D12](#)) report was submitted alongside the Plan. Through the HRA process the council consulted with Natural England, other stakeholders and the public.
- 1.2. Following submission of the Plan, the council received correspondence from the Planning Inspectors: Preliminary Questions (INSP01) dated 28th January 2022 and Matters and Issues Questions dated 22nd April 2022 (INSP03 superseded by (INSP03a) dated 22nd April 2022.
- 1.3. Under Section 20(7) of the Planning and Compulsory Purchase Act (2004), as revised by Section 112 of the Localism Act (2011), modifications are either classified as "main" or "additional" modifications:
- 1.4. Main Modifications are required to resolve issues in order to make the Local Plan 'justified' or improve the effectiveness of the policy, in response to the Inspector's MIQs. They involve changes or additions to policies which are essential for the Plan to be found sound in line with paragraph 35 of the National Planning Policy Framework.
- 1.5. The council is proposing Main Modifications (MMs) to the Plan. Additional Modifications are not subject to HRA as they are unlikely to result in negative impacts or significant negative effects to European sites.
- 1.6. The purpose of this HRA is to consider whether the MMs would:
 - lead to any new effects on any European sites (alone or in combination) that have not been considered by the HRA to date or,
 - alter the findings of the submitted HRA such as the conclusions of the HRA.

Conclusions

- 1.7. This HRA Screening concludes that the overall findings of the submitted HRA ([0D12](#)) remains. None of the proposed Main Modifications (appendix A) will lead to any new effects on any European sites (alone or in combination) that have not been previously considered by the HRA to date; nor do they alter the scale of any effects previously considered through the HRA. The conclusion of the HRA set out in the submitted HRA report therefore, remain valid. Consequently, there no requirement for 'Appropriate Assessment'.

2 Screening of the Main Modifications (MM)

2.1. As required under Regulation 105 of the Conservation of Habitats and Species Regulations - an assessment of the '*likely significant effects*' is undertaken below in Appendix A. For this HRA a risk-based approach involving the application of the precautionary principle will be adopted in the assessment, such that a conclusion of '*no significant effect*' will only be reached where it is considered 'very unlikely', based on current knowledge and the information available, that a policy or site allocation would have a significant effect on the integrity of a European site.

3 Summary of assessment

3.1. 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 alters the conclusions of the HRA such as 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 nation 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.

3.2. The following MM were screened 'in' for this HRA to assess effect of these changes on the integrity of a European site.

- MM 5.1 and 5.1a Morden Wider town centre area
- MM19.1 (New) Policy M19.1 Monitoring

3.3. The effects of these changes on the conclusions of the HRA are summarised in the following sections.

New policy chapter M19.1 Monitoring (MM19.1)

3.4. Merton Council must publish an authority monitoring report at least annually to provide information relating to the Local Plan as set out in Section 113 of the Localism Act 2011. Therefore, the council is proposing a Monitoring policy. The policy is to set out clear criteria and framework of monitoring the effectiveness and performance of the Plan. Additional, circumstances as to when the council will trigger an early review of the Plan.

3.5. This HRA screening of this new policy found that, it would have no effect because no development could occur through the policy itself, the development being implemented are found in other policies in the plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.

Morden MM5.1 and MM5.1a

- 3.6. MM5.1 proposal is to remove 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. In summary, none of these modifications will lead to any new effects on any European sites (alone or in combination) that have not been previously considered by the HRA to date; nor do they alter the magnitude of any effects previously considered through the HRA. The provisional conclusions of this HRA set out in the main HRA report therefore remain valid.
- 3.7. MM5.1a proposal is to 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. In summary, none of these modifications will lead to new effects on any European sites (alone or in combination) that have not been previously considered by the HRA to date; nor do they alter the magnitude of any effects previously considered through the HRA. The conclusions of this HRA are that the main HRA report therefore remain valid.
- 3.8. In assessing MM5.1 and 5.1a the HRA has had regard to the Wealden judgement and the revised the method of which Natural England expects to see in combination air pollution effects assessed. The implication of the judgement is that, where the road traffic effects of other plans or projects are known or can be reasonably estimated (including those of adopted plans or consents projects), then these should be included. According to the Department of Transport, the contribution of vehicle emissions from the roadside beyond 200 metres is not significant, in determining the environmental impact, in this case from the European site.

In combination air quality

- 3.9. In combination effects none identified.

Policies Map

- 3.10. Although the changes to the Policies Map Modifications are not 'screened in' (Appendix A) as part of this HRA. It should be noted that proposed MM are in general minor typographical changes or small alterations related to the MMs. In summary, none of these modifications will lead to any new effects on any European sites (alone or in combination) that have not been previously considered by the HRA to date; nor do they alter the magnitude of any effects previously considered through the HRA.

Appendix A: Screening of proposed MMs

MM ref.	Page	Plan Ref.	Proposed Changes	Justification	Date made	Implications for 2021 HRA findings
MM1.1	14	1 st sentence below subheading: Identifying Merton's Growth areas	A considerable proportion of Merton's growth up to 2036/37 and beyond is, expected to be, delivered in the Opportunity Area (OA). The OA is, designated in the London Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton's OA.	Soundness. To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year plan period to be 2022/23 - 2036/37.	March 2022 in response to Inspectors' preliminary matters	No change to HRA findings.
MM1.2	32	Spatial vision, new bullet point	<u>Have protected and improved access to the borough's Metropolitan Open Land (MOL), parks and open spaces, and have protected and enhanced biodiversity and areas of nature conservation.</u>	Soundness: For compliance with national policy and to reflect the environmental Strategic Objectives set out on page 29.	May 2022 – response to Inspectors' MIQs.	No change to HRA findings: The wording is proposed to be amended for clarity and the changes do not affect the meaning of the policy. So there is no change to the impact on European site
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.	March 2022 - response to Inspectors' preliminary matters	No change to HRA findings.

				Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors' Preliminary Letter March 2022		
MM2.1a	42	Policy CC2.2 Minimising Greenhouse Gas Emissions	<p>1. Minimising Greenhouse Gas Emissions</p> <p>We will require all proposed All development within the borough should seek to demonstrate that the fullest contribution to minimising greenhouse gas emissions has been made on site.</p> <p>This will be achieved by requiring:</p> <p>2. All development:</p> <p>We will require:</p> <p>3. <u>All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:</u></p> <p>a. To reduce greenhouse gas emissions on-site and minimise both annual and peak energy demand in accordance with the Mayor of London's Energy Hierarchy below, or in line with any future locally derived methodology:</p> <ul style="list-style-type: none"> i. Be lean: use less energy and manage demand during operation ii. Be clean: exploit local energy resources (such as secondary heat) and supply energy 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 <p>4. All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:</p>	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	No change to HRA findings: The wording is proposed provide clarity and improves effectiveness of the policy
MM2.2	42	Policy CC2.2 Minimising Greenhouse Gas Emissions, part b	To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance	March 2022 – response to Inspectors'	No change to HRA findings: The wording is proposed to

				have been removed or amended.	preliminary matters	ensure the policy is justified and conform to guidance which have been removed or amended.
MM2.2a	43	Footnote 3	This represents a minimum improvement beyond Part L of Building Regulations 2013. When Building Regulations are updated we will seek to apply <u>publish</u> 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	No change to HRA findings – The change reflects the amendment to Policy CC2.2 which is considered separately above.
MM2.2b	48	2.2.17	In order to incentivise developers to implement lower carbon strategies on site where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development (e.g. 30 years) will therefore be offset at a rate of £300/t as at 2021. The price for offsetting carbon is regularly reviewed; this will be monitored and, if necessary, updated. Any changes to Merton's suggested carbon offset price will be updated in future guidance. <u>this will be monitored and, if necessary, updated.</u>	To improve clarity in response to the Inspector's MIQs.	May 2022 – response to the Inspector's MIQs	No change to HRA findings. The wording is proposed to be amended for clarity and the changes do not affect the meaning of the policy. So there is no change to the impact on European site
MM2.3	64	Policy CC2.5 (a-d)	<p>5. Minimising Waste and Promoting Circular Economy</p> <p>Merton Council will require all <u>All</u> development proposals to should <u>adopt</u> a circular economy approach to building design and construction, and be designed for durability, flexibility and easy disassembly, <u>to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.</u> <u>This will be achieved by</u></p>	Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	May 2022 – in response to the Inspector's Matters, Issues & Questions.	No change to HRA findings. The wording is proposed to be amended for clarity and improve effectiveness The changes do not

			<p>requiring:</p> <p>All development:</p> <p>a. To prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.</p> <p>b. To be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the 'in-use' and 'end of life' phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.</p> <p>c. To ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime. <u>Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.</u></p>			<p>affect the direction of the policy. So there is no change to the impact on European site</p>
MM2.4	64	Policy CC2.5 (e)	<p>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 maximised<u>actions taken to reduce life-cycle carbon emissions.</u></p>	<p>Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.</p>	<p>May 2022 – in response to the Inspector's Matters, Issues & Questions.</p>	<p>No change to HRA findings. The wording is proposed to be amended for clarity and improve effectiveness. The changes do not affect the meaning of the policy.</p> <p>So there is no change to the impact on European site</p>
MM3.1	81	Colliers Wood: Policy N3.1, New part after f	<p><u>Supporting tall buildings within Colliers Wood town centre in accordance with the details in the Strategic Heights Diagram for Colliers Wood town centre and the</u></p>	<p>To be in general conformity with London Plan. Strategic Heights</p>	<p>November 2021 – for submission</p>	<p>No change to HRA findings. Changes made</p>

			<u>requirements in Policy D12.6 Tall Buildings.</u>	Diagrams have been introduced to show specific locations that are appropriate for tall buildings. The Strategic Height Diagrams 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.		to be in conformity with the London Plan.
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. <u>The Strategic Heights Diagram for the Colliers Wood Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'</u>	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022 – response to Inspectors' Stage 1 matters INSP03	No change to HRA findings. Changes made to be in conformity with the London Plan.
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. <u>Development proposals must protect and enhance the Wandle Valley Metropolitan Open Land (MOL) along the western boundary of the site, in accordance with the Green Infrastructure policies set out in Chapter 15.</u>	For clarity and accuracy and to maintain consistency with London Plan and National Policy.	May 2022 – response to Inspectors' MIQ.	

MM3.4	104	Site Allocation CW5, Impacts a designated open space	<u>Yes, the western edge Parts</u> 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.	No change to HRA findings. 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 <u>2022-2037</u> which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and has been submitted to the Sectary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.	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	No change to HRA findings.
MM4.2	146	Site Allocation Mi11 Raleigh Gardens car park, Approach to tall buildings	Approach to tall buildings: Development of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.	Site allocation removed from a site appropriate for tall buildings at Stage 3 (Reg 19). This text remained by accident.	May 2022 – response to Inspectors' Stage 1 matters INSP03	No change to HRA findings.
MM5.1	173	Morden: Policy N5.1, KEY OBJECTIVES: MORDEN	6. Providing more high quality homes Incorporate Provide new homes in the Morden and in particular, within the Morden Regeneration Zone Wider Morden Town Centre Area with a diverse mix of housing sizes and tenures.	To improve clarity and accuracy of where the majority of new homes will be delivered. Main Modification MM3.1 results in tall buildings only being supported within the Morden Regeneration Zone (Mo1). The removal of references to the potential appropriateness of tall buildings within some locations in the Wider	November 2021 – for submission	To improve clarity and accuracy of where the majority of new homes will be delivered. Screen in

				<p>Morden Town Centre Area (WMTCA), but outside the Morden Regeneration Zone, results in the designation of the WMTCA no longer being justified, as development proposals within this area could be addressed by means of other policies within the draft Local Plan and the London Plan. All references to the WMTCA are therefore proposed to be removed.</p> <p>As the details of a possible 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.</p>		
MM5.1a	177	Morden: Policy N5.1 part a	<p><u>Development pP</u>proposals <u>for large sites (0.25 hectares and above)</u> that <u>assist contribute to</u> the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo41(AM5.10), will be supported.</p>	<p>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</p>	May 2022	<p>To improve clarity and accuracy of where the majority of new homes will be delivered.</p> <p>Screen in</p> <p>In combination air pollution: In light of the and</p>

				justified.		the implication of the Wealden judgement there are no environmental 'significant' effects on the European site as the site is beyond 200 metres.
MM5.1b	182	5.1.18	...There are also multiple other land ownership interests within the Morden Regeneration Zone <u>and landowners are strongly encouraged to work together.</u> and a Land assembly <u>strategy</u> will be required to ensure that the <u>comprehensive regeneration of Site allocation Mo1 can be achieved by the end of this local plan period and site can be developed in a comprehensive manner,</u> (AM5.16a)to avoid fragmented development and suboptimal densities in this highly accessible location...	Changes informed by discussions with landowners and proposed to ensure that the plan is positively prepared.	May 2022	
MM5.1c	199	Site allocation Mo3, Infrastructure Requirements	Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application. <u>In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wandle Valley MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.</u>	For consistency with national policy.	May 2022 - in response to the Inspectors' MIQs.	The modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. Addition of wording is environmentally positive. No change to HRA findings.
MM5.2	202	Site Allocation Mo4, Site	Commencement within 5 years and delivery in phases within 105-15 years.	To ensure that the site allocation is 'justified'.	May 2022 - in	No change to HRA findings.

		deliverability			response to the Inspectors' MIQs.	Changes made to ensure the allocation is 'justified'.
MM9.1	268	Wimbledon: Policy N9.1, part j.	Securing <u>improvements to public transport and (AM9.2)</u> investment in Wimbledon station to improve the passenger experience and reduce severance with new bridges over the railway . Any proposals for Wimbledon Station should provide links to neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.	Main modification to make the plan effective and deliverable by removing reference to new bridges over the railway as this would need to be enabled by Crossrail2, which is unlikely to occur in the plan period.	November 2021 – for submission	No change to HRA findings.
MM9.2	268	Wimbledon Policy N9.1, new part after j	<u>Creating a more pleasant environment for shopping and leisure activities in by reducing traffic dominance and managing delivery and servicing needs in a safe, efficient and sustainable way, including through exploring the use of freight consolidation and last mile delivery solutions</u> . 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	For consistency with national policy and clarity.	November 2021 – for submission	No change to HRA findings.
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. <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard</u>	For further clarity on building heights and general conformity with the London Plan Policy.	March 2022 – response to Inspectors' preliminary matters May 2022	No change to HRA findings. Changes provide clarity and conformity to the London Plan.

			<u>to the Future Wimbledon SPD.</u>			
MM9.4	283 and 284	Site allocation Wi3	<p><i>Move the following existing paragraph from “site description” on page 283 to “design and accessibility guidance” on page 284</i></p> <p>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.</p>	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	No change to HRA findings. As text was already in the Plan.
MM9.5	284	Site allocation Wi3	<p><i>Design and Accessibility guidance:</i> Development proposal must respect the site’s historic setting including the views to St Mary’s Church and the surrounding area and the views from the Grade II* listed Wimbledon Park.</p> <p><i>Impacts listed buildings or undesignated heritage assets</i> Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and the Wimbledon Club (privately owned) are the remains of a 18th century Capability Brown designed landscape which is now a Grade II* listed Historic Park and is on the “heritage at risk register”</p>	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	No change to HRA findings. As text was already in the Plan (see MM9.4)
MM9.5a	284	Site allocation Wi3, new paragraph under Infrastructure requirements	<p><u>In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wimbledon Park MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.</u></p>	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.
MM9.6	308	Site Allocation Wi12	<p>Approach to tall buildings Development of the site could include taller buildings <u>of up to 10 storeys subject to consideration of impacts on existing character and townscape. subject to consideration of impacts on existing character and townscape in accordance</u></p>	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022	No change to HRA findings. Change made to be in conformity

			<u>with policies D12.3 'Ensuring high quality design for all developments' and D12.6 'Tall buildings'.</u>			with the London Plan and does not reflect a change direction of the Plan.
MM11.1	333	H11.1	<u>Strategic</u> policy H11.1 Housing Choice	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors' preliminary matters	No change to HRA findings. This is a factual change.
MM11.2	334	Policy H11.1 (f) Table	Threshold (gross) Affordable housing tenure split 10 or more homes 70% Low-cost rent 30% Intermediate <u>(Including a minimum of 25% First Homes)</u> 2-9 homes 70% Low-cost rent 30% Intermediate <u>(Including a minimum 25% First Homes)</u>	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters, Issues and Questions	No change to HRA findings. 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	<u>For First Homes the affordable home ownership prices will differ from those set out in supporting paragraph 11.1.11 and Figure 4.1.3 as in accordance with government requirements First Homes must be discounted by a minimum of 30% against the market value and after the discount is applied the first sale must be at a price no higher than £420,000 in Greater London.</u>	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters, Issues and Questions	No change to HRA findings. Changes made to comply more effectively with the PPG on First Homes and to improve 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). <u>On schemes where policy-compliant provision of First Homes</u>	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters,	No change to HRA findings. Changes made to comply more

			<u>does not result in 10% of the overall housing yield of the site being available for affordable home ownership, any shortfall in this respect would need to be made up from the rest of the intermediate contribution before other types of intermediate affordable housing would be considered.</u>		Issues and Questions	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, <u>and such schemes will be required to contribute to the objective of creating mixed and balanced communities and meet the requirements set out in the London Plan supporting paragraphs 4.4.9 to 4.4.13 (inclusive).</u>	To be consistent with NPPF and in general conformity with the London Plan	May 2022-response to Inspectors' Matters, Issues and Questions	No change to HRA findings. Change ensure consistency with the NPPF and conformity with the London Plan.
MM11.8	342	Paragraph11.1.23	<u>In accordance with the NPPF and London Plan Policy H7 (Monitoring of affordable housing) The the information on off-site and cash in lieu delivery is monitored and published annually as part of Merton's annual Infrastructure Funding Statement and Merton's Authority Monitoring Report (AMR).</u>	To be consistent with NPPF and in general conformity with the London Plan	May 2022-response to Inspectors' Matters, Issues and Questions	No change to HRA findings. Change ensure consistency with the NPPF and conformity with the London Plan.
MMXXX	345	New paragraph following paragraph 11.1.38	<u>Securing M4(2) and M4(3) dwellings</u> <u>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.</u>	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022-response to Inspectors' Matters, Issues and Questions	No change to HRA findings. Due to the need to in compliance with national PPG.
MM11.9	345	New paragraph following paragraph 11.1.38	<u>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.</u>	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022-response to Inspectors' Matters, Issues and Questions	No change to HRA findings. Due to the need to in compliance with national PPG.

MM11.1	346	H11.2	<u>Strategic</u> policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	May 2022- response to Inspectors' Matters, Issues and Questions	No change to HRA findings.
MM1.1	346	H11.2	We will aim to deliver a minimum of 11,732 <u>11,374</u> additional homes for the period 2021/22 – 2035/36 <u>2022/23 - 2036/37</u> .	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 response to Inspectors' preliminary matters	No change to HRA findings.
MM2.2	346	Policy H11.2, part c	Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 <u>and having regard to</u> Merton's design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.	See above MM2.2 at page 42.	March 2022 to response to Inspectors' preliminary matters	No change to HRA findings.
MM1.1	347	11.2.1	We will encourage housing in sustainable brownfield locations. The 11,732 <u>11,374</u> additional homes for the period 2021/22 – 2035/36 <u>2022/23 – 2036/37</u> will come forward in Merton by:	See above - initial MM1.1 at Page 14 Formerly AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors' preliminary matters	No change to HRA findings.

MM1.1	347	Supporting new paragraph after 11.2.4	<u>The SHLAA 2017 findings indicates that for Merton the target for the period 2029/30 to 2033/34 is 474 homes per annum then for the remaining period 2034/35 to 2036/37 increases to 548 homes per annum.</u>	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. Moved to Main Modifications in response to Inspectors preliminary letter, March 2022	March 2022 – response to Inspectors’ preliminary matters	No change to HRA findings.								
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 <u>2022/23 – 2036/ 37 2021/22 – 2035/36</u> using a stepped housing delivery target.	See above - initial MM1.1 at Page 14	In response to Inspectors preliminary letter, March 2022	No change to HRA findings.								
MM1.1	348	11.2.8	In accordance with London Plan paragraph 4.1.11, Merton’s target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings <u>and includes the rolling forward of the small sites target beyond 2029</u> . This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to <u>2036/37 2035/36</u> of <u>1,644 1,096</u> as indicated in the following table: <table border="1" data-bbox="622 943 1077 1082"> <thead> <tr> <th>Plan period</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>2029/30 - 2033/34</td> <td>2,370</td> </tr> <tr> <td><u>2034/35 – 2036/37 2035/36</u></td> <td><u>1,644 1,096</u></td> </tr> <tr> <td><u>2029/30 – 2036/37 2035/36</u></td> <td><u>4,014 3,466</u></td> </tr> </tbody> </table>	Plan period	Target	2029/30 - 2033/34	2,370	<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 1,096</u>	<u>2029/30 – 2036/37 2035/36</u>	<u>4,014 3,466</u>			No change to HRA findings
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<u>2029/30 – 2036/37 2035/36</u>	<u>4,014 3,466</u>													
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 <u>700</u> homes per annum for the period <u>2022/23 2021/22, increasing to 950 for the period 2024/25 – 2026/27 2023/24</u> , and then increase to 1,080 <u>1,555</u> for 2027/28 – 2028/29 <u>the period 2024/25- 2026/27,</u> then further increase to 1,350 for the period 2027/28 – 2028/29 . <u>This ensures that Merton’s Local Plan housing requirement for the Plan period 2022/23 – 2036/37 including the shortfall of 928 new homes is met.</u>	See above - initial MM1.1 at Page 14 Formerly AM11.8. Moved to Main Modifications in response to Inspectors preliminary matters	March 2022 – response to Inspectors’ preliminary matters Further corrections	No change to HRA findings.								

					submitted 11 March 2022.	
MM1.1	349	Figure 4.2.1	<i>Figure 11.2.1 'Merton Housing Trajectory 2022/23 – 2036/37' updated – refer to Appendix 2</i>	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	No change to HRA findings.
MM11.1 1	366	Policy H11.6 e	The suitability of ground conditions, particularly in respect to the potential to flooding. <u>Please also refer to policies contained in Chapter 15 (Green and Blue Infrastructure) including policies F15.7; F15.8 and F15.9.</u>	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	No change to HRA findings. Wording is proposed to be amended for clarity and the changes do not change the direction of the plan. So there is no change to the impact on European site
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	No change to HRA findings. Deletion provides clarity.

MM11.1 3	366	Policy H11.6	<u>NEW CRITERION The provision of a high standard of amenity for future occupants of sites particularly in terms of residential amenity, noise and air quality. Please also refer to policies contained in Chapter 12 (Places and Spaces in a Growing Borough) and Chapter 15 (Green and Blue Infrastructure) including policies F15.7 to F15.10.</u>	To improve clarity and link it relationship with other policy areas of the Plan in response to MIQs	May 2022. Response to Inspectors' Matters, Issues and Questions	No change to HRA findings. Additional wording not relevant to HRA conclusions but are environmentally positive.
MM11.1 4	368	New supporting para following existing para 11.6.6	<u>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.</u>	To improve clarity and soundness of the Plan in response to MIQs	May 2022-response to Inspectors' Matters, Issues and Questions	No change to HRA findings. The wording is proposed to be 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.
MM13.1 a	449	13.3.9	13.3.9 In circumstances where proposals for mixed use development are considered, proposals must be designed to ensure the future occupation and function of employment uses, upon completion. <u>In line with the Agent of Change principle set out in the London Plan and the NPPF, the council will not support proposals on scattered employment site where these would curtail the successful operation of non-residential uses.</u> The premises/sites retained for employment uses must:	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	No change to HRA findings. 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	<p>Within Wimbledon, Colliers Wood, Mitcham and Morden town centres</p> <p>a3. In addition to (a)2, supporting proposals for developments that:</p> <p>ia. Provide a range of commercial unit sizes;</p> <p>ib. 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.</p> <p>c. <u>Betting shops (use identified as sui generis), are not compatible with the main retail or social function of the town centres and are not considered appropriate new uses within the primary shopping area.</u></p> <p>Within Local town centres</p> <p>a4. Supporting proposals:</p> <p>...</p> <p>c. <u>that do not provide betting shops within the primary shopping area.</u></p>	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	No change to HRA findings. The wording provides clarity and effectiveness.
MM13.2	457	13.5.8	Betting shops and hot food takeaways (use identified as sui generis), are not compatible with the main retail or social function of the town centres and thus are not considered appropriate new uses outside of <u>within</u> the primary shopping area <u>of Merton's town centres</u> .	To improve clarity and effectiveness	May 2022. Response to the Inspectors questions	No change to HRA findings. The change reflects the amendment to MM13.1 which is considered separately above. Wording provides clarity and effectiveness.
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	Impact assessments may be required for any retail	Clarity and justification	May 2022	No change to

		sentence)	proposals located edge-of-centre or out-of-centre where the net floor area <u>of the new proposal</u> exceeds 280sqm.		– response to Inspectors matters, issues and questions.	HRA findings. Wording provides clarity and justification.
MM13.5	465	13.6.5 (second sentence)	In accordance with the <u>National Planning Policy Framework 2019</u> (<u>NPPF 2021 paragraph 90(MM2.1)</u>), impact assessments will be required for leisure and office development above 2,500 sqm <u>gross</u> 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. <u>Where basements discharge to the sewer network, they must install suitable positively pumped devices.</u>	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.
MM15.0	505	New paragraphs after 5.1.2	<u>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.</u> <u>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</u>	For consistency with national policy.	May 2022 – response to Inspectors' matters issues and questions.	No change to HRA findings. Wording is consistency with national planning policy.

			<u>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.</u>			
MM15.1	511	Policy O15.3 (d)	Require development to contribute to net gains in <u>B</u> biodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links. <u>Where development is adjacent to or includes a river, natural banks must be restored with a 10m buffer included.</u>	Agreed with the Environment Agency in Statement of Common Ground. Added as AM15.6	November 2021 – submission (added as AM15.6)	No change to HRA findings. The modification does not result in any changes to the proposed quantum or location of development or affect the Additional wording is environmentally positive.
MM15.2	544	Policy P15.10 Improving Air Quality and Minimising Pollution	g. Development proposals must consider the impact <u>of air quality. An AQA will be required for proposals</u> introducing new developments in areas already subject to poor air, <u>major developments, developments involving biomass boilers, biomass or gas CHP (including connections to existing networks where the increased capacity is not already covered in an existing AQA), substantial earthworks or demolition and any development that could have a significant impact on air quality, either directly or indirectly. The</u> 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	No change to HRA findings. 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. <u>In determining the contribution, the Council will refer to the London Plan Air Quality Neutral guidance (section 5).</u>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022. Matters and Issues Question (MIQs) from the Planning Inspector	No change to HRA findings. The wording provides clarity and do not change the direction of the Plan.
MM15.4	549	Policy P15.10 Improving Air Quality and Minimising Pollution	<u>New Para: The Council will apply London Plan 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.</u>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector	No change to HRA findings. 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	<u>The aim of an AQA is to find any significant impact on local air quality and/or disamenity due to dust and/or odour and/ or whether new development will introduce new exposure in an area of poor air quality. The contents of the AQA will depend on the nature of the proposed development.</u>	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	No change to HRA findings. The wording provides clarity and do not change the direction of the Plan.

MM15.6	15.109	Policy P15.10 Improving Air Quality and Minimising Pollution	<p>We have adopted the London Plan’s approach to Air Quality Positive and Neutral development. Large master planning and large-scale developments have the potential to include methods to improve local air quality. All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been, exploited, financial contributions to offset the impact of the development on air quality may be, considered as a final intervention. The process and calculation for this are set out in Section 5.2 of the GLA’s Air Quality Neutral Planning Support Document (AQNPSD).</p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector	No change to HRA findings. 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	<p><u>New paragraph</u></p> <p><u>The whole of Merton is designated an Air Quality Management Area (AQMA) and has three Air Quality Focus Zones in the borough. The main sources of particulate matter are road transport (50.4%), re- suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). In respect of the transport sources apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NOx emissions and 80% of the PM10 emissions (based on 2013 modelled data).</u></p> <p><u>Merton’s air quality priorities are to continue to encourage</u></p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector	No change to HRA findings. The wording provides clarity and do not change the direction of the Plan.

			<p><u>sustainable travel and sustainable construction; to reduce exposure to air quality and raise awareness; and to work in partnership with residents, community and business groups, Transport for London and other organisations to concentrate on local pollution problems in Merton.</u></p>			
MM15.8	After para 15.10.7	Policy P15.10 Improving Air Quality and Minimising Pollution	<p>The local plan can influence air quality in several ways, for example through what development is proposed and where, and the provision made for sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible. The whole borough has been declared an Air Quality Management Area (AQMA) for last two decades.</p> <p>We seek to tackle poor air quality in an integrated way, the Local Plan together with a wider range of measures set out in Merton's Air Quality Action Plan, which supports the Government's Clean Air Strategy (2019), the Mayor of London Environment Strategy (2018) and other legislation.</p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.		<p>Changes are for clarity and do not change the direction of the Plan.</p> <p>No implications for HRA findings.</p>
15.9		Policy P15.10 Improving Air Quality and Minimising Pollution	<p>New para.-Consideration must be given to the impact of improvements on air quality elsewhere. For instance, traffic reductions could improve local air quality but push traffic-related air quality impacts to other areas. Early engagement with us is encouraged to assess how the development could avoid these unintended consequences. The supporting emerging Air Quality Supplementary</p>	Following review of the policy in light of MIQs – the council propose making the MM for clarity.	May 2022	No implications for SA findings.

			<p>Planning Document (SPD) provides further details on for AQA and what; we expect to be, proved within an AQA. The assessment should provide decision makers with sufficient information to understand the scale and geographic scope of any detrimental, or benefit impacts on air quality and enable them to exercise their professional judgement in deciding whether the impacts are acceptable, in line with best practice.</p>			
15.10	15.10.09		<p>Air Quality Neutral and Positive</p> <p>We have adopted the London Plan’s approach to Air Quality Positive and Neutral development. Large master planning and large-scale developments have the potential to include methods to improve local air quality. All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been, exploited, financial contributions to offset the impact of the development on air quality may be, considered as a final intervention. The process and calculation for this are set out in Section 5.2 of the GLA’s Air Quality Neutral Planning Support Document (AQNPSD).</p>	<p>Following review of the policy in light of MIQs – the council propose making the MM for clarity.</p>	May 2022	<p>Changes made to be in conformity with the London Plan. No implication for the HRA findings.</p>
MM16.1	560	Para 16.1.2	<p>As set out in tThe Mayor’s Transport Strategy <u>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</u></p>	<p>Additional reference to newly published Decarbonising Strategy and associated</p>	May 2022	<p>No change to the HRA. The direction of</p>

			<u>framework and strategic approach to transport which focuses on reducing</u> dependency on cars in favour of active, efficient and sustainable modes of travel.	wording amendment.		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 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.	Amendment made as proposed by TfL Spatial Planning and to ensure consistency with London Plan policy T5 A 2 which states that <i>“Developments should provide cycle parking at least in accordance with the minimum standards.”</i>	November 21, 2021. March 22. Response to Inspectors preliminary matters	No change to the HRA. Changes made to be in conformity with the London Plan.
MM16.3	574	16.4.14	The Government <u>has published a decarbonising transport strategy which includes proposals to increase the uptake of electric vehicles (EVs) and end the sale of new petrol and diesel cars by 2030.</u> 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.	Supporting text amended and updated to include reference to the Government’s recently published <u>decarbonising transport</u> strategy.	November 2021 for submission – was previously AM16.23	No change to the HRA. 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. <u>For developments that comprise of a mix of dedicated private parking spaces and communal parking, the London Plan requirement for 20% active EV provision should be fully applied to any communal parking facilities. Developers should also refer to Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles (publishing.service.gov.uk) that may also be applicable to the development.</u> For public car parking facilities, such as at retail facilities, EV infrastructure should include...	Sentence added to provide clarity in relation to application of the London Plan standard for the provision of EV charge points for mixed developments. This is in response to newly published Government proposals for building regulation to require all new dwellings with dedicated parking	March 2022	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.

				space to have a charge point installed. For developments comprising a mix of units with communal parking and houses with private driveways, there is concern that a development could attempt to meet both the building regs requirement and the London Plan 20% standard by allocating charge points first to units with private parking and thus leaving communal parking facilities with no or inadequate EV charging provision.		No change to HRA findings. The change reflects the amendment to MM16.3 which is considered separately above.
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	No change to HRA findings. effectiveness and regulatory compliance of the Local Plan.
MM18.2	641	New glossary term after Convenience Retailing	<u>Conversion</u> <u>The conversion of existing single dwellings into two or more smaller dwellings.</u>	To improve clarity in response to the Inspector’s MIQs.	May 2022 – response to Inspector’s MIQs.	No change to HRA findings. Provides clarity.
MM-MOL Map-01a	Map	Policies Map – Metropolitan Open Land	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-3).</i>	This site contains 4 residential properties which do not form part of the adjoining cemetery and are physically separated.	November 2021 – for submission	No change to HRA findings. Ensures the Plan is justified. Please refer to maps below.

				They do not meet any of the MOL criteria set out in the London Plan and officers consider that their inclusion in the MOL is an anomaly 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.		
MM-MOL Map-01b	Map	Policies Map – Metropolitan Open Land	<i>Slight boundary amendments around the Eveline Day Nursery SW20 9NA from Lower Morden Metropolitan Open Land (MOL-3).</i>	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	No change to HRA findings. Ensures the Plan is justified. Please refer to maps below.
MM-Open Space Map-02	Map	Policies Map – Open Space	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Merton and Sutton Joint Cemetery Surrounds Open Space (M074).</i>	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	November 2021 – for submission	No change to HRA findings. Ensures the Plan is justified. Please refer to maps below.

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

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

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

				by Archaeological Priority Areas according to the latest information from Historic England.		
MM-Conservation Areas-Map-09	Map	Policies Map Conservation Areas	<i>Added labels to the map showing the Conservation Area codes and also a table below the legend with the name of each of the Conservation Areas</i>	For clarity and to ensure the Local Plan is “justified”, the Conservation Areas map has been labelled. Refer to map Appendix 1 for details.	November 2021 – for submission	No change to HRA findings. Ensures the Plan is justified. Please refer to maps below.
MM-Listed Buildings-Map-10	Map	Policies Map Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Historic England. This modification ensures that the Local Plan is “justified”	November 2021 – for submission	No change to HRA findings. Update ensures the Plan is justified. See maps below. Please refer to maps below.
MM-Locally Listed Buildings-Map-11	Map	Policies Map Locally Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Merton Council. This modification ensures that the Local Plan is “justified”. Refer to map Appendix 1 for details.	November 2021 – for submission	No change to HRA findings. Update ensures the Plan is justified. See maps below. Please refer to maps below.
MM-Wandle Cycle Route-Map-12	Map	Policies Map Wandle Cycle Route	<i>New map to highlight the cycle routes that are part of the Wandle Trail</i>	For clarity the cycle network that is part of the Wandle Trail has been added as a separate map to highlight its importance in enabling active travel choices. This change was requested at the Stage 3 consultation	November 2021 – for submission	No change to HRA findings. Additional information provides clarity.

				from the Wandle Valley Forum.		
MM-Merton-Cycle Network-Map13	Map	Policies Map New map	<i>Cycle network routes have been updated to show the Wandle Missing Link</i>	For accuracy and to ensure that the Local Plan is 'justified', the cycle network map has been updated to reflect the latest agreement on the Wandle Missing Link on the borough boundary between Merton and Wandsworth. Refer to map Appendix 1 for details.	November 2021 – for submission	No change to HRA findings. Additional information provides clarity.
MM19.1	After page 665	Insert new policy M19.1 Monitoring	<i>Refer to Appendix 3 for new policy wording</i>	To improve clarity of the proposed monitoring arrangements that will gauge the effectiveness of the policies and will help to inform the Local Plan review process, and therefore ensure the overall soundness of the Local Plan.	March 2022 – response to Inspectors' preliminary matters May 2022 – response to Inspector's Matters, Issues & Questions.	Screen in. Screening finding: No effect because no development could occur through the policy itself.

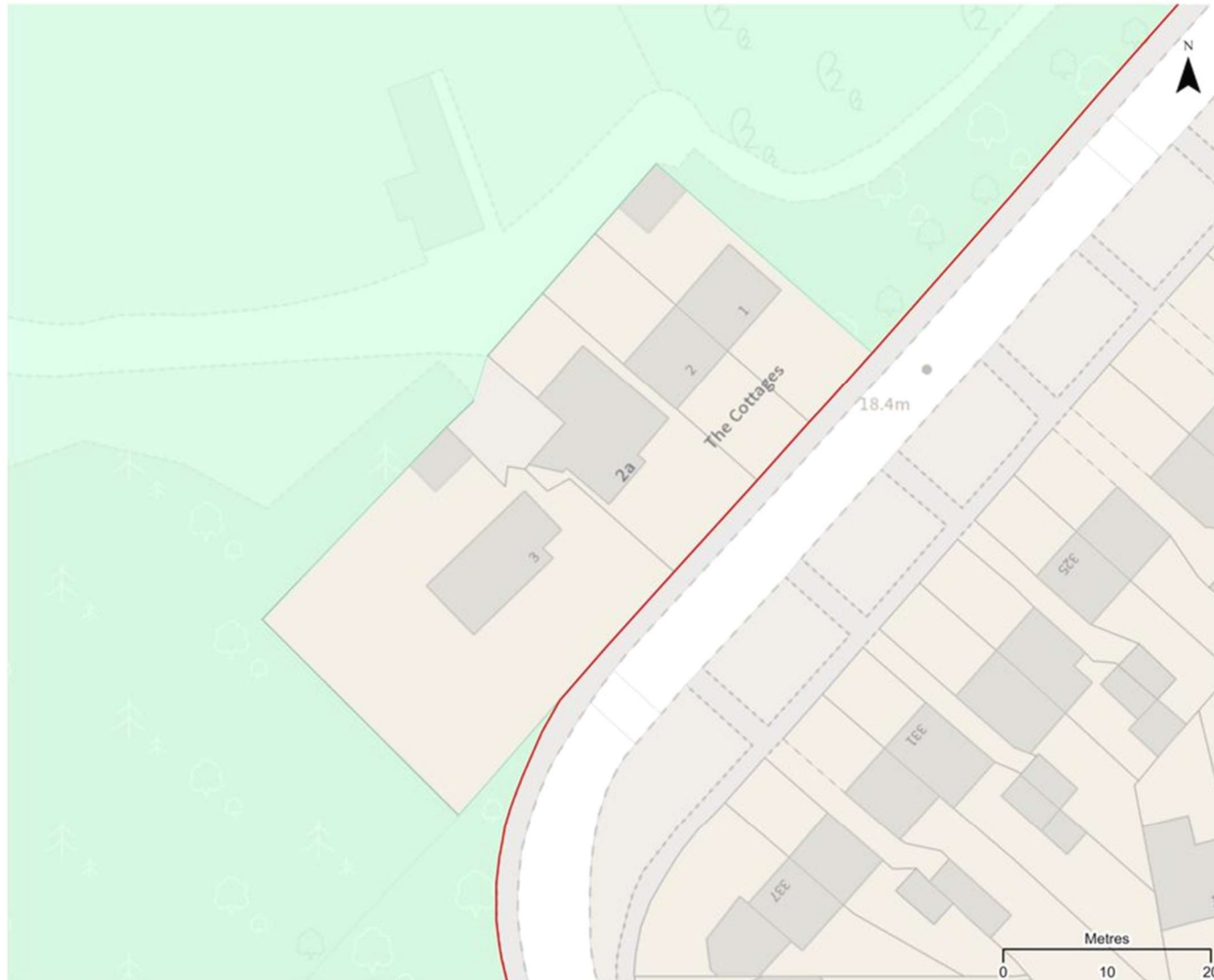
3.1 It should be noted that the council does not propose to remove any individual site of MOL in its entirety. As illustrated on the Policies Map (Document 0D2), there are 9 MOL sites within the borough, totalling over 960 hectares. The 12 MOL boundary amendments proposed through this Plan are minimal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

- 3.2 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).
- 3.3 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-MOL-Map-01a

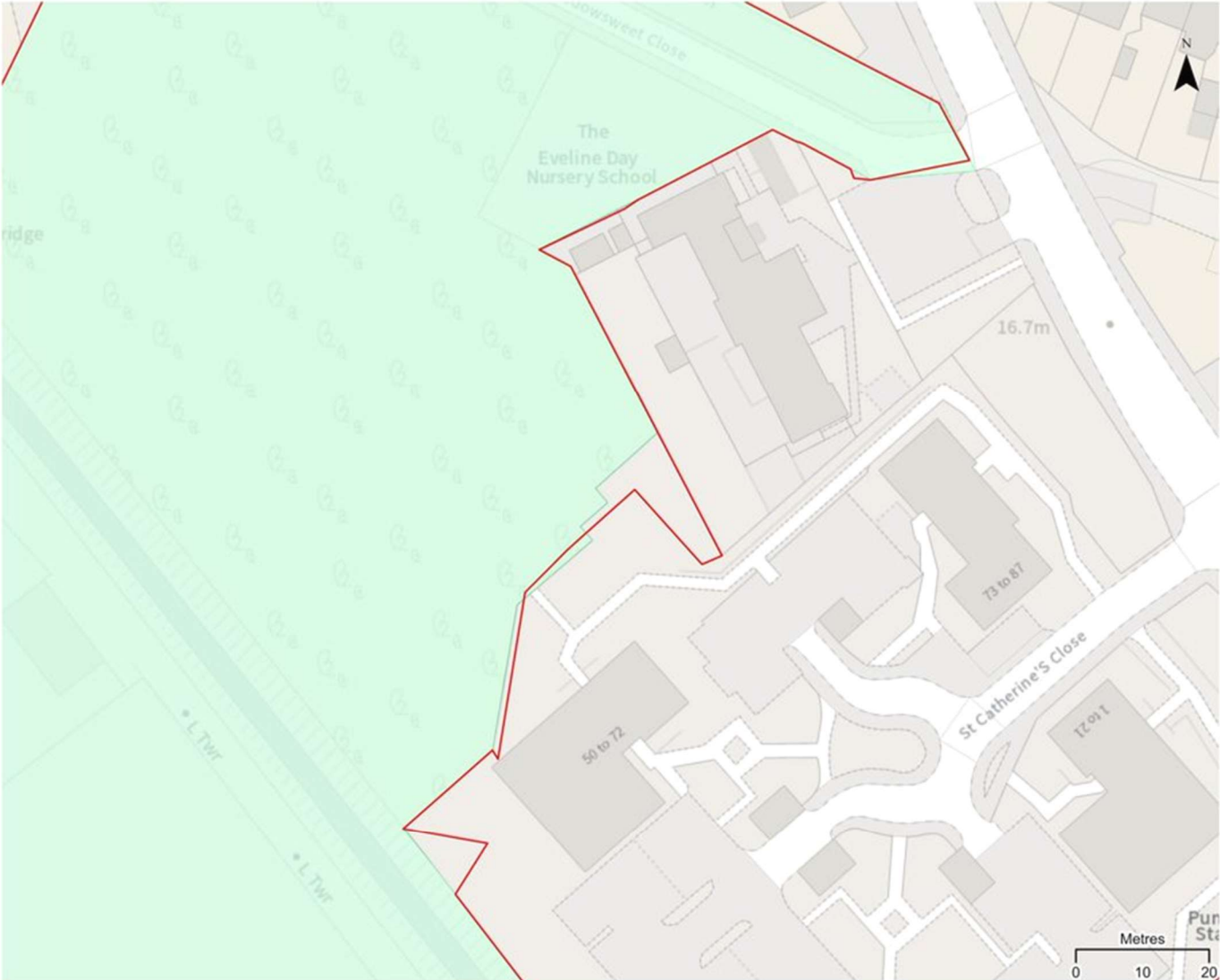
- MOL Stage 3
- MOL Submission



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MM-MOL-Map-01b



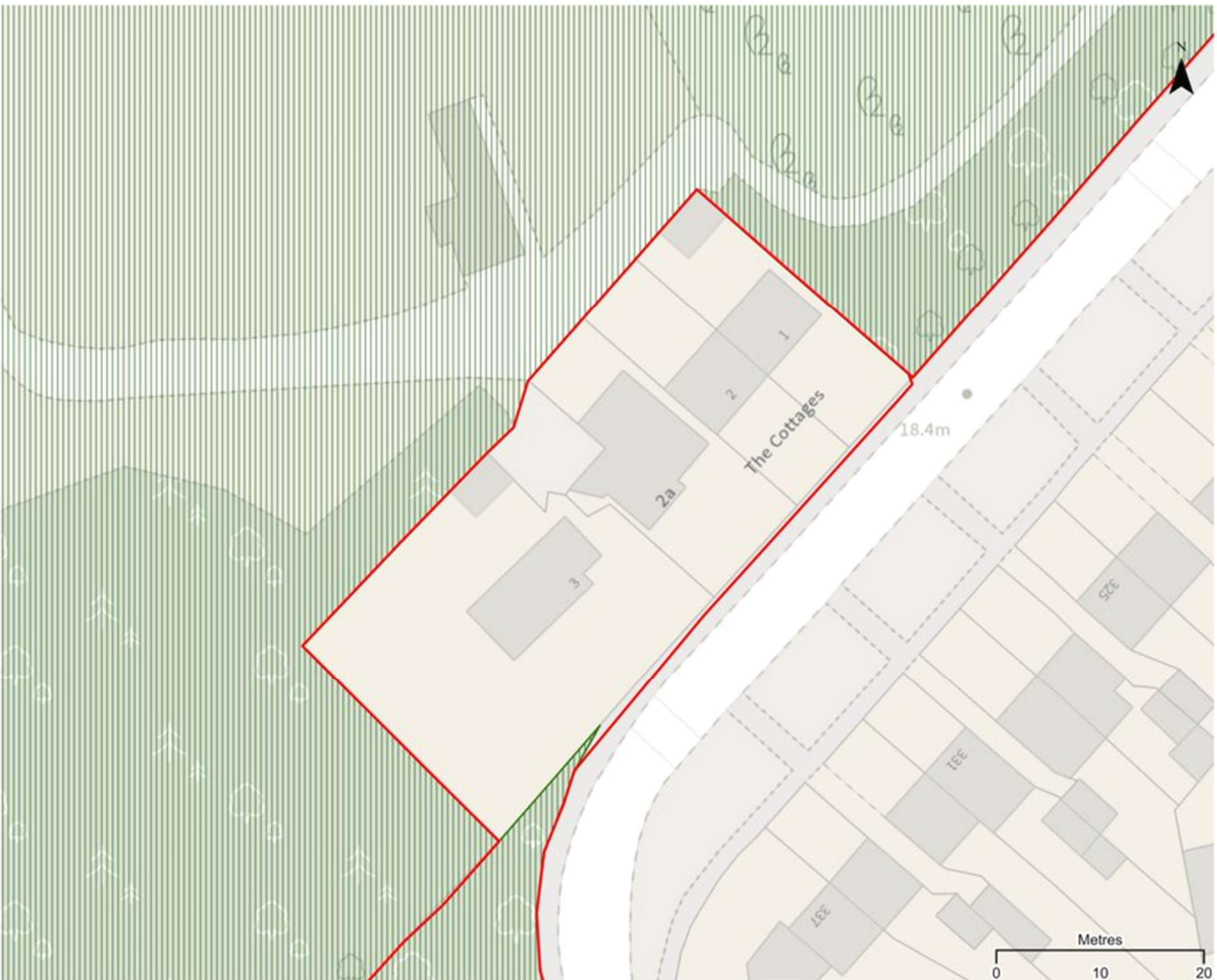
- MOL Stage 3
- MOL Submission

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MM-Open Space- Map-02



- Open Space Stage 3
- Open Space Submission



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

-  Open Space Stage 3
-  Open Space Submissior

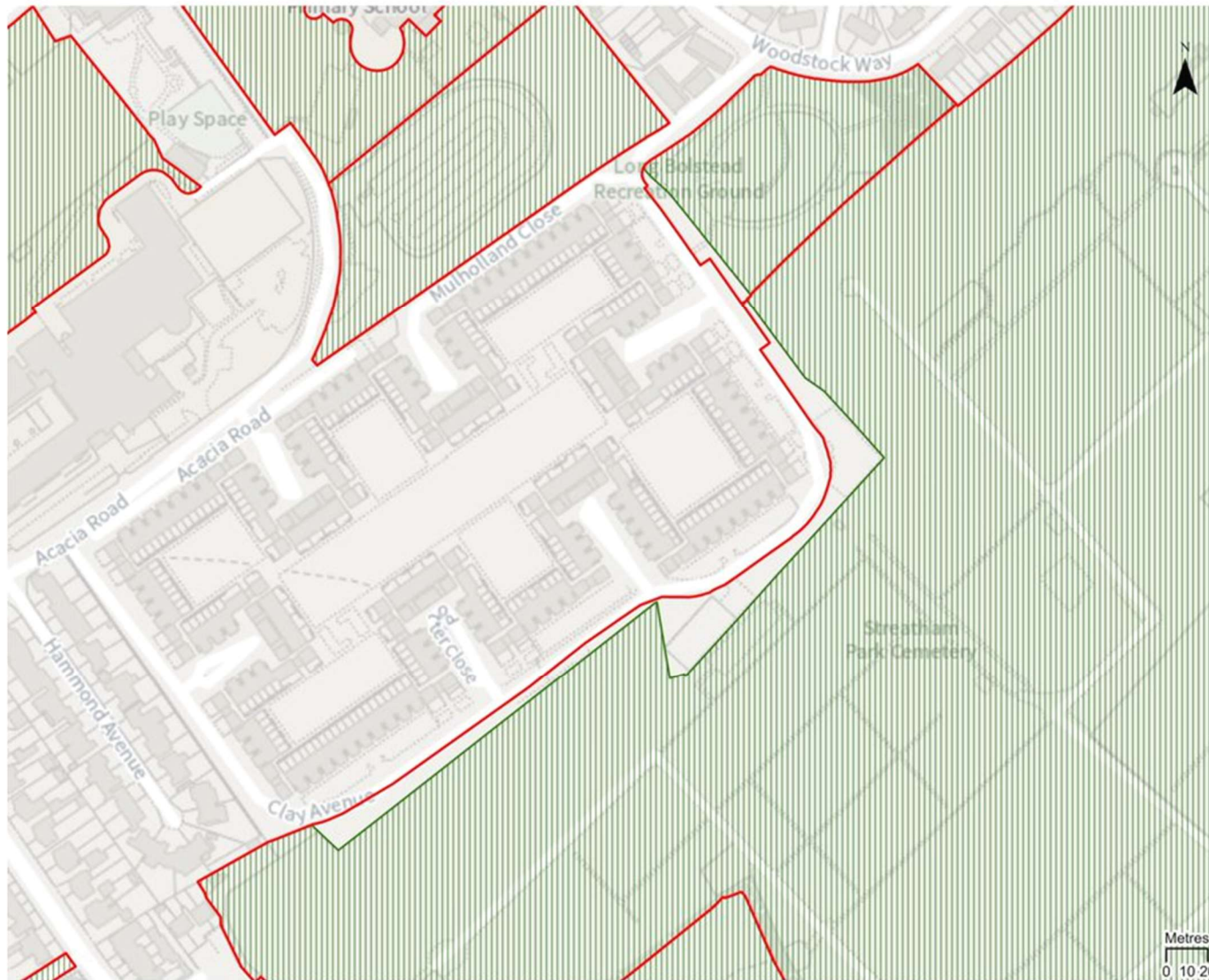


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MM-Open Space- Map-04

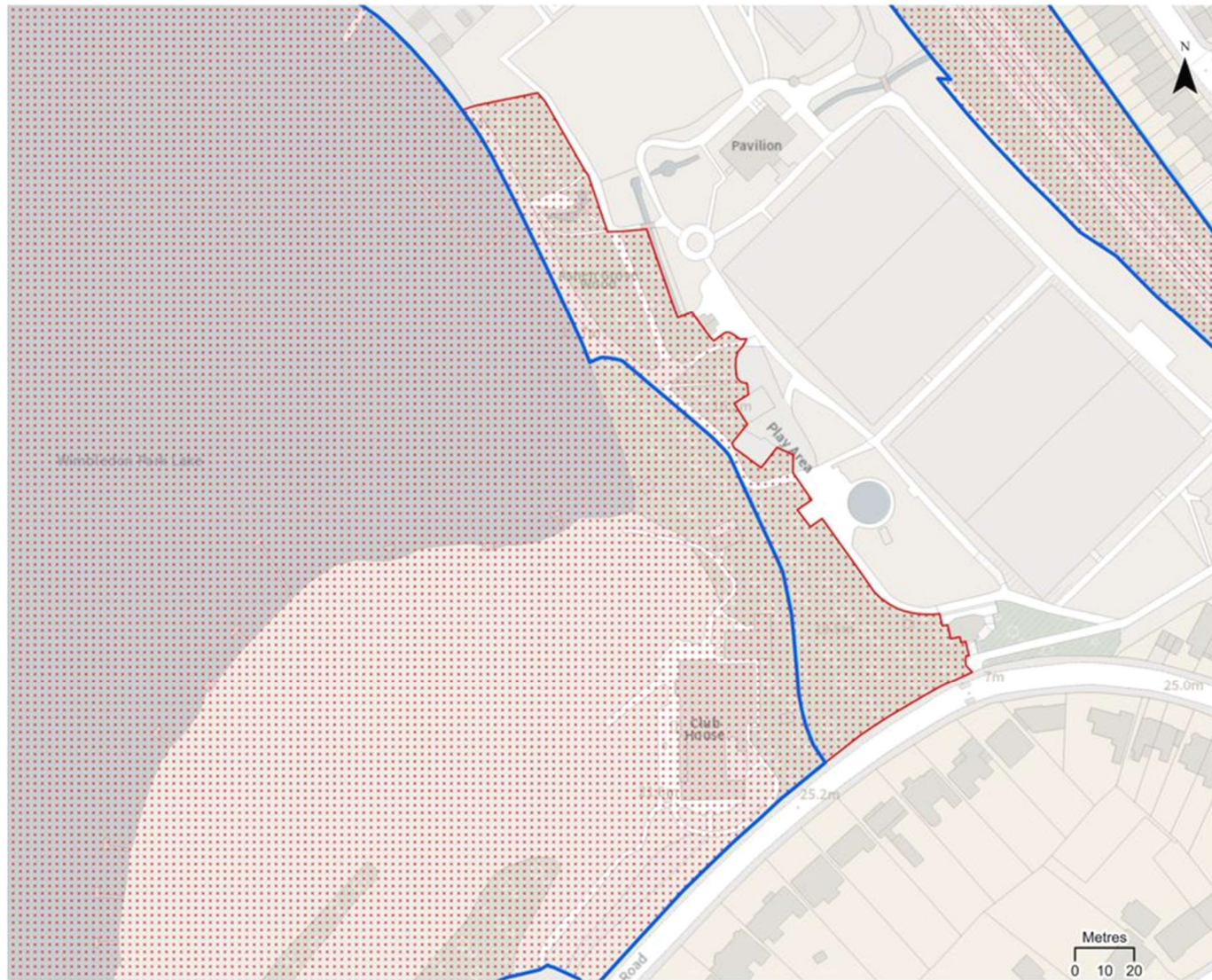
-  Open Space Stage 3
-  Open Space Submission





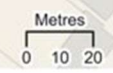
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MM-SINC-Map-05





-  SINCs Stage 3
-  SINCs Submission

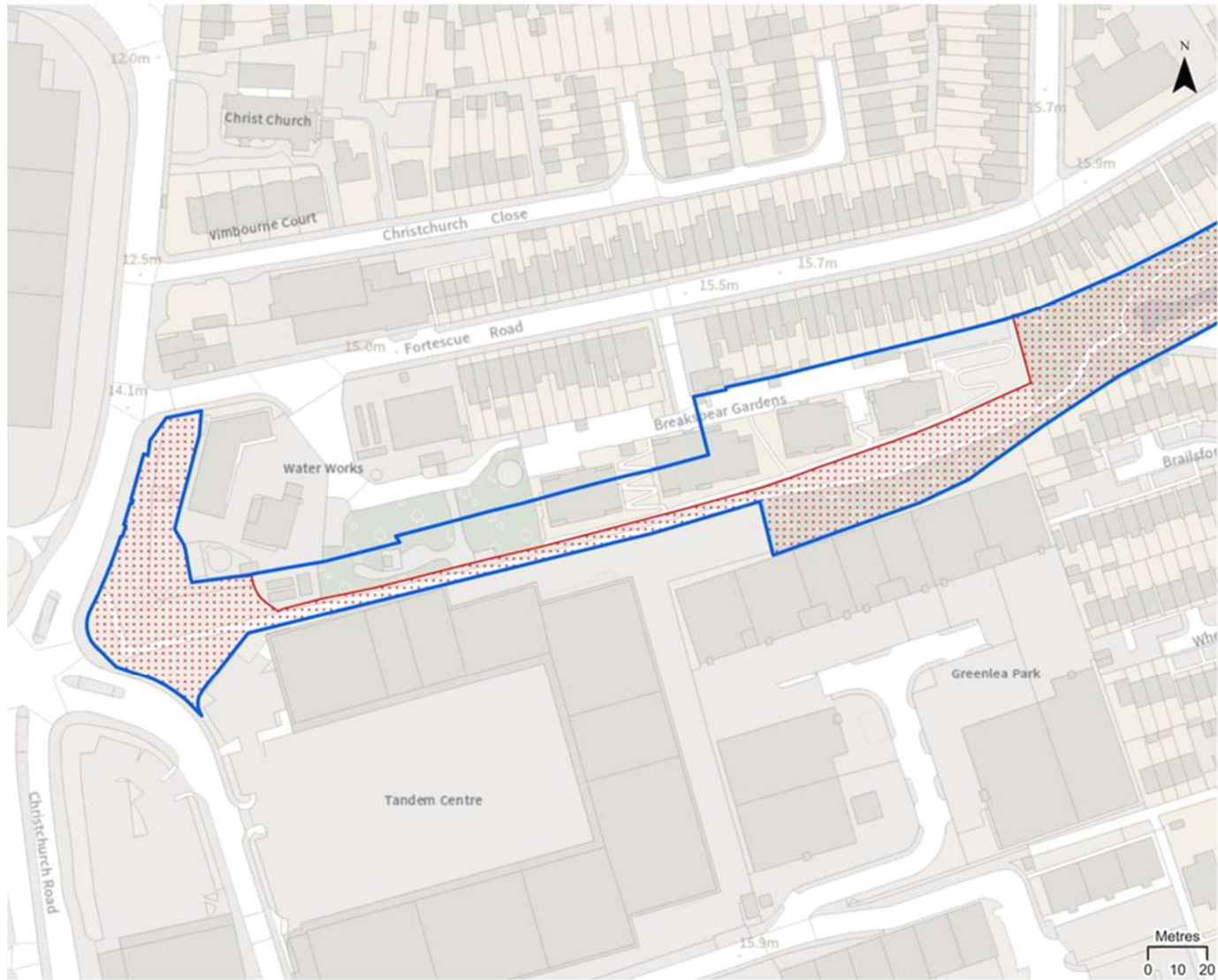


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MM-SINC-Map-06



-  SINC's Stage 3
-  SINC's Submission



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

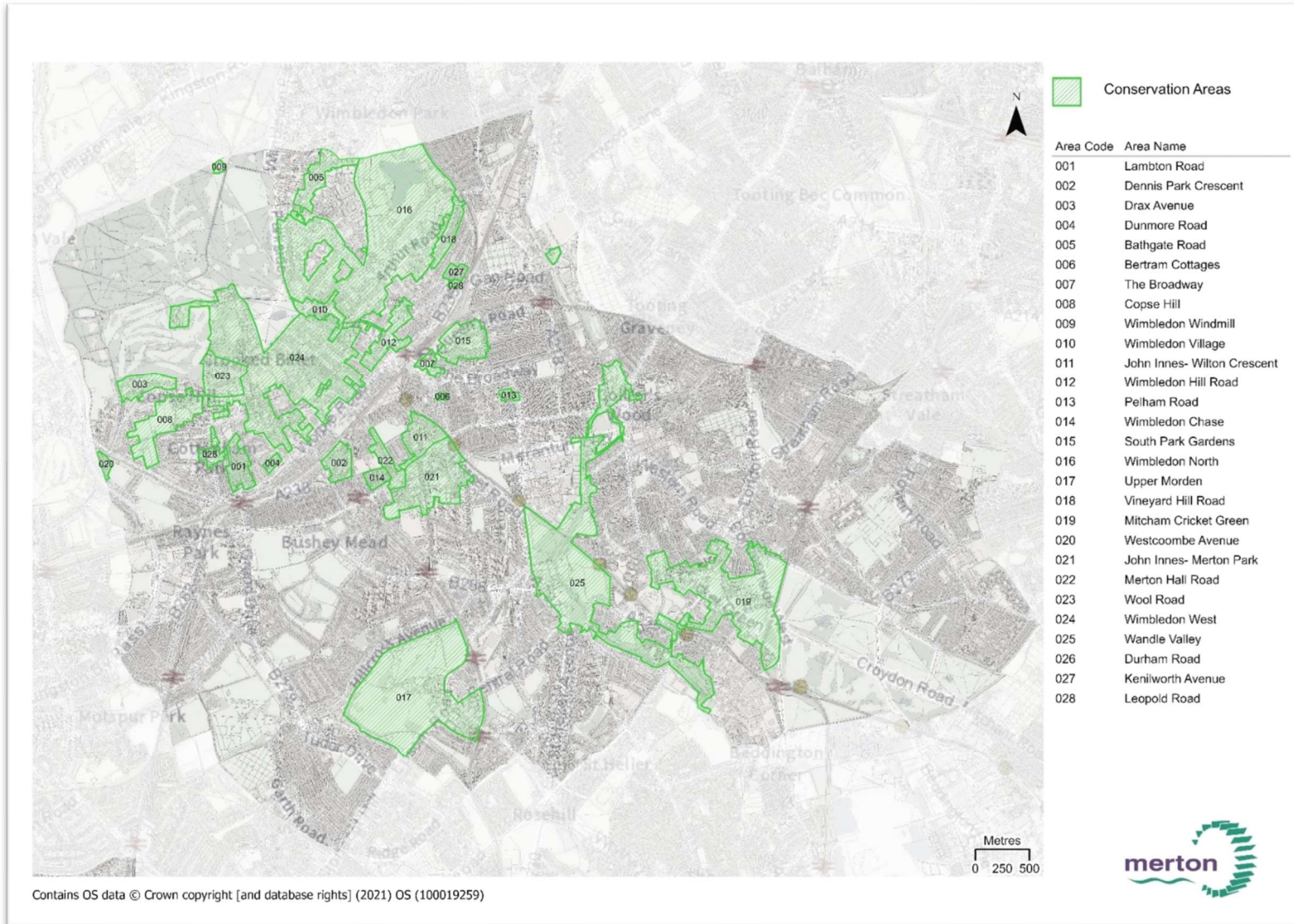
-  Green Corridors Submission
-  Green Corridors Stage 3



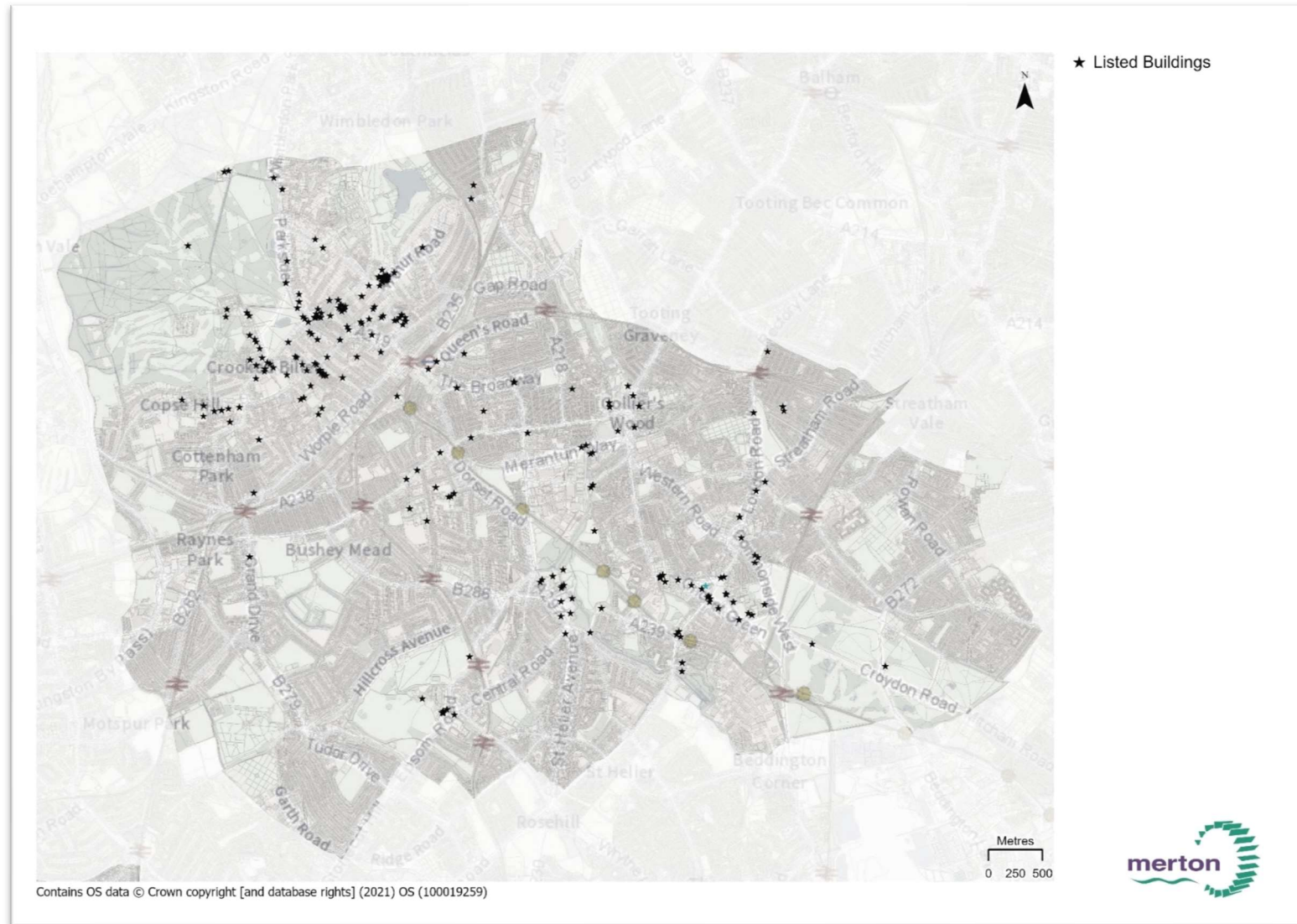
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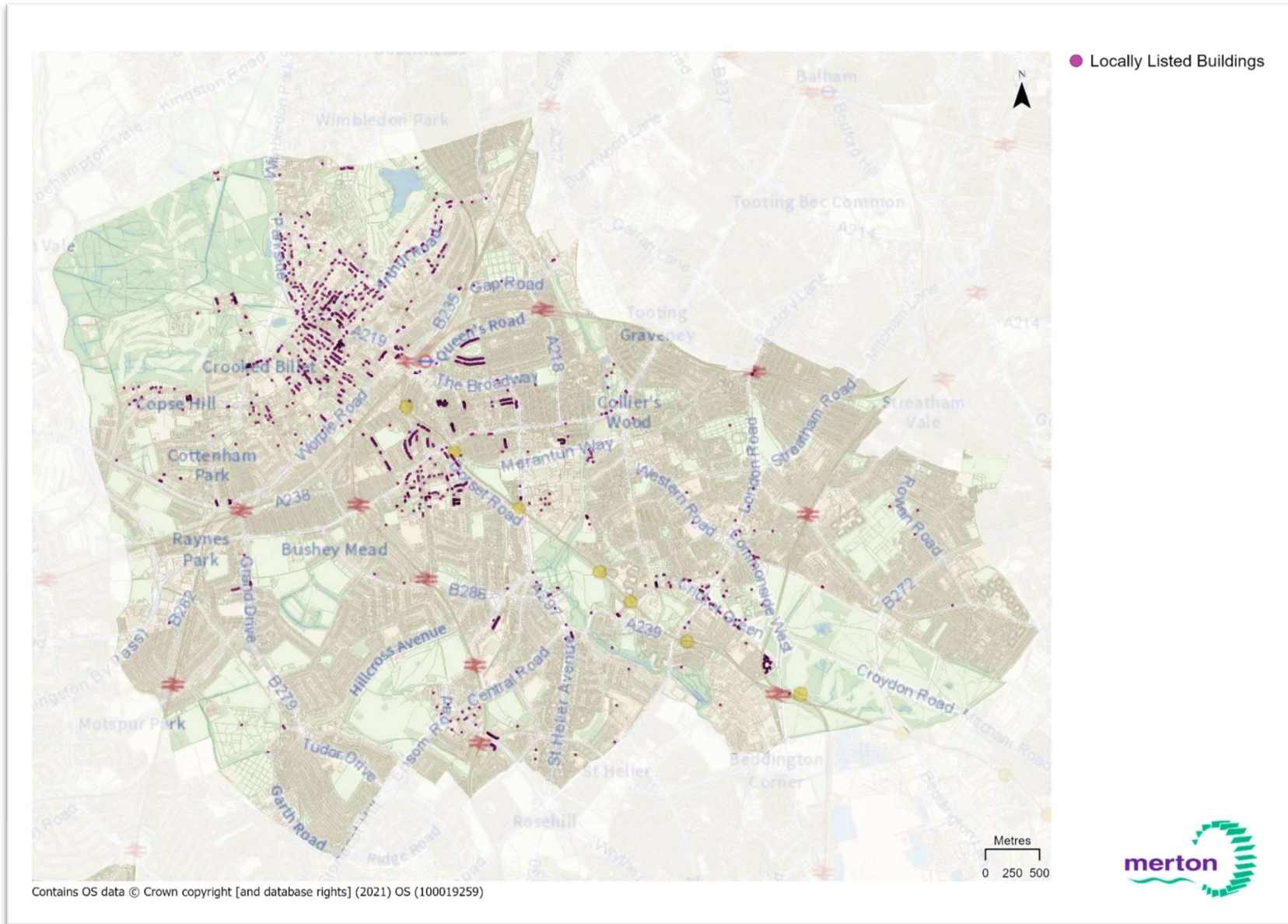
MM-Conservation Areas-Map-09



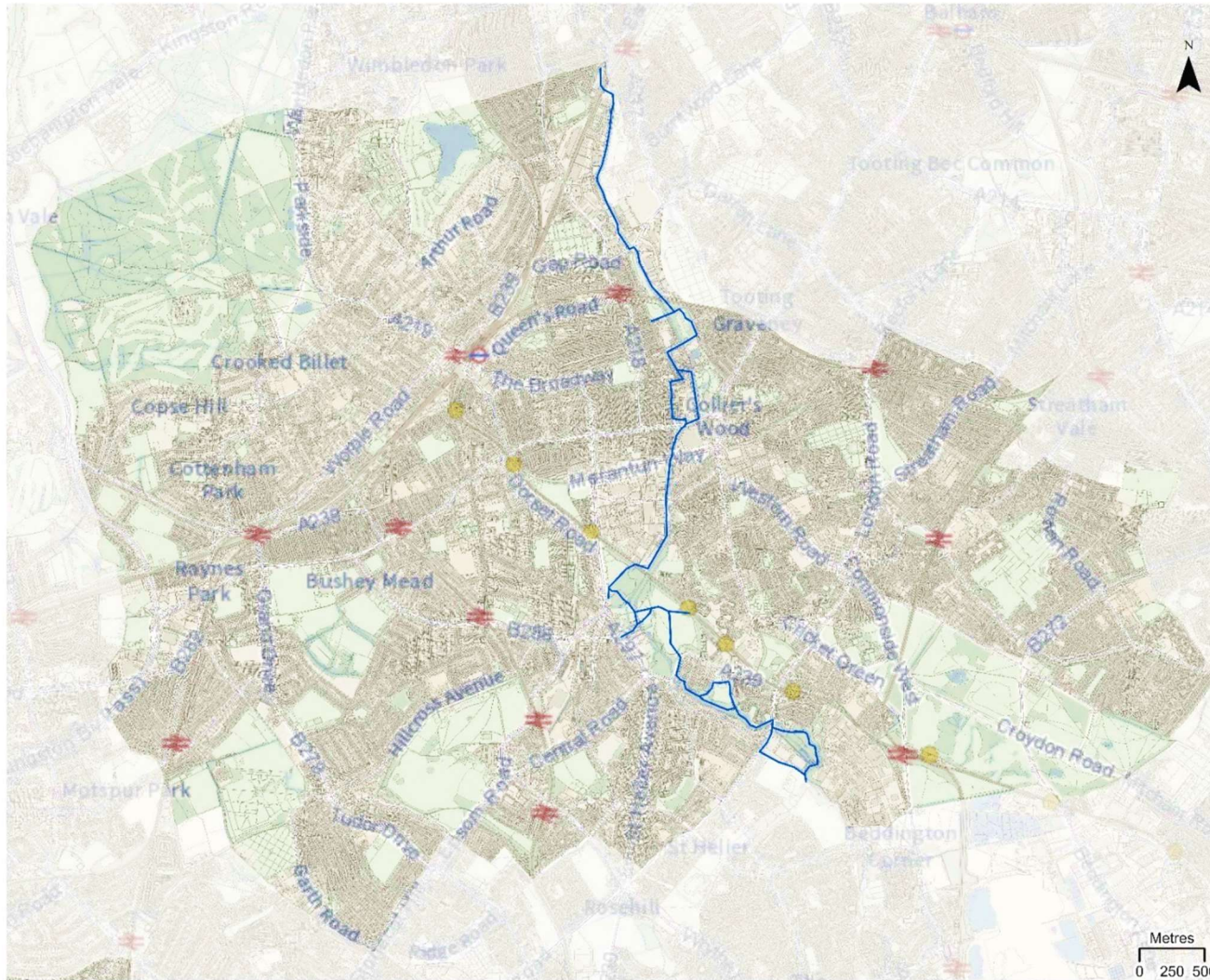
MM-Listed Buildings- Map-10



MM-Locally Listed Buildings-Map-11



MM-Wandle Cycle Route- Map-12

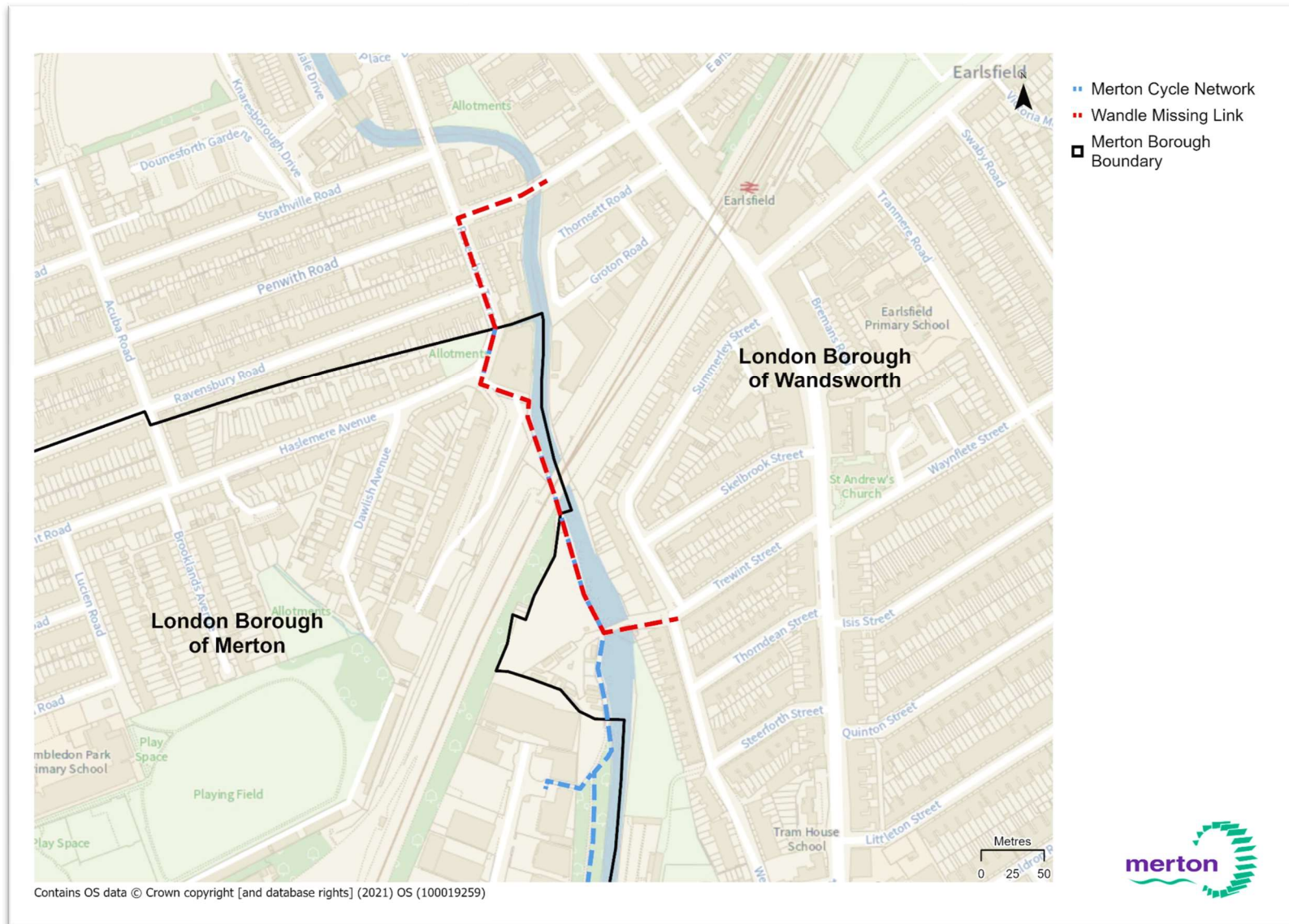


— Wandle Cycle Route



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MM-Merton-Cycle Network-Map13

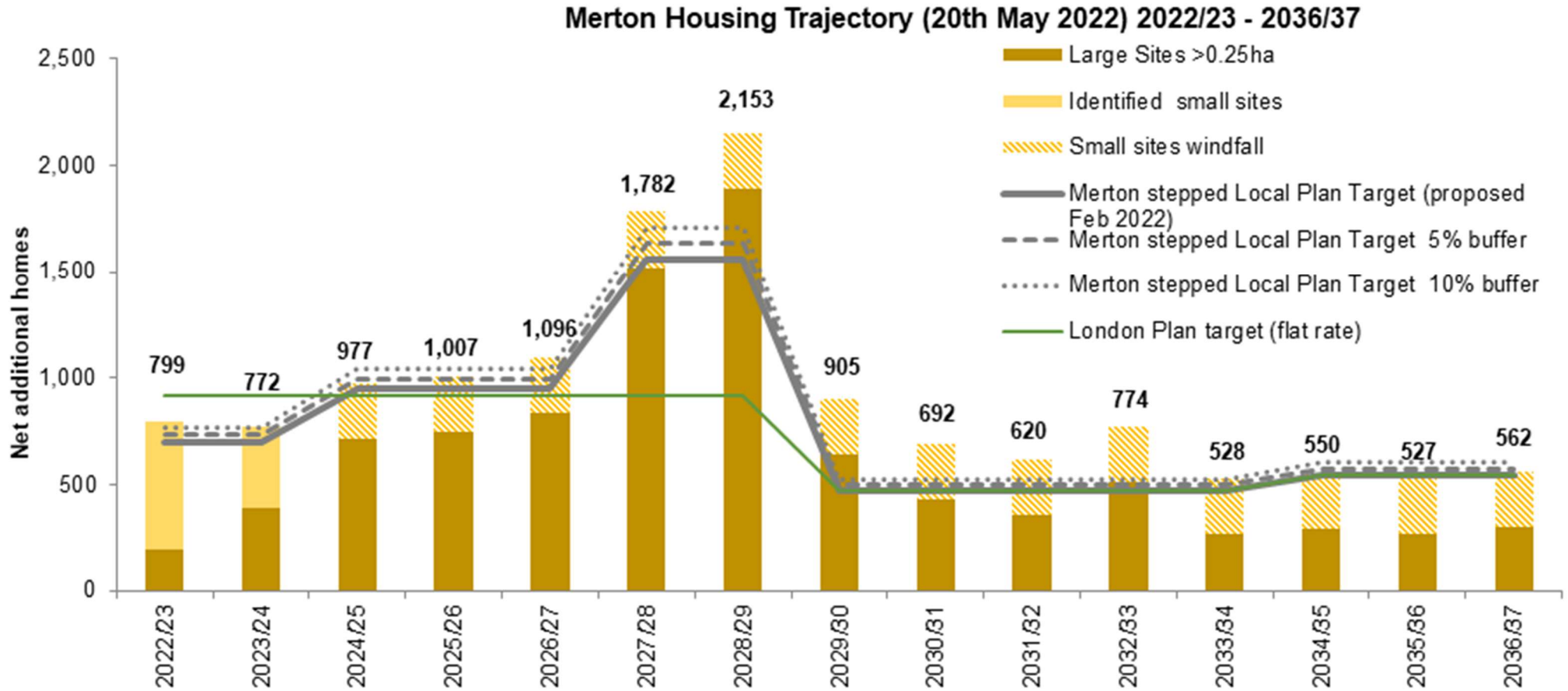


Page 348 - Figure Paragraph 11.2.7 and Figure 4.2.2 Merton’s stepped housing delivery target (MM1.1)

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	<u>Shortfall from 2019/20 and 2020/21</u>	Total
Merton Local Plan target	775 <u>750</u>	775 <u>700</u>	775 <u>700</u>	1,080 <u>950</u>	1,080 <u>950</u>	1,080 <u>950</u>	1,350 <u>1,555</u>	1,350 <u>1,555</u>		8265 <u>7,360</u>
London Plan target	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	1,033 <u>918</u>	<u>928</u>	8265 <u>6,426</u>

Figure 11 4.2.2 Merton's stepped housing delivery target



After page 665 (MM19.1) new Policy

19. MONITORING

Policy M19.1 Monitoring

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

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

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

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

Supporting text

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

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

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

19.1.4 Currently, the council has no reason to believe that the plan will not be implemented in full. However, the council accepts that there could be circumstances where development fails to come forward for a number of reasons, some of which are beyond the control of the council. These could include delivery challenges on a site or a more general slowdown in the economy and its ability to deliver viable development. Where the council can use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

Local Plan monitoring framework

- 19.1.5 The monitoring framework sets out the monitoring indicators for the Local Plan, which will be reported in the AMR. The AMR is not the only monitoring tool. There are separate monitoring arrangements of other related strategies, for example, the climate change strategy and action plan, and the South London Waste Plan. The monitoring framework below relates to the performance of this Local Plan.
- 19.1.6 Regular monitoring will include analysis of delivery data and trends. Taking account of changes in legislation at the regional and national level. Reviewing the plan's supporting evidence base where necessary. If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to a full or partial review of the Local Plan and its policies.

Reviewing the plan

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

Local Plan Monitoring Framework

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<u>Growth Area (Opportunity Area)</u>	<u>London Plan indicative target (up to 2041) to deliver 5,000 new homes and 6,000 jobs (indicative figure).</u>	<u>Cumulative housing completions since OA designation.</u> <u>Cumulative non-residential floorspace approvals and completions since OA designation.</u>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<p data-bbox="277 201 439 233"><u>Air quality</u></p> <p data-bbox="277 304 770 496"><u>To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</u></p>	<p data-bbox="965 201 1420 312"><u>Number of days p.a. when air pollution is moderate or high for PM10*</u></p> <p data-bbox="965 384 1473 536"><u>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre - more than 35 times a year at any measuring site.</u></p>	<p data-bbox="1659 201 2119 272"><u>Decreasing number of days of high PM10 over a 3-year period.</u></p>
<p data-bbox="277 552 461 584"><u>Biodiversity</u></p> <p data-bbox="277 655 775 1046"><u>To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</u></p>	<p data-bbox="965 552 1424 624"><u>Changes in areas of biodiversity importance.</u></p>	<p data-bbox="1659 552 2130 624"><u>No net loss of sites of importance for nature conservation (SINCS).</u></p>
<p data-bbox="277 1062 707 1134"><u>Land and soil condition and pollutants</u></p> <p data-bbox="277 1206 730 1358"><u>To conserve Merton's geodiversity and protect soils from development and over intensive use.</u></p>	<p data-bbox="965 1062 1473 1214"><u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u></p>	<p data-bbox="1682 1062 2152 1174"><u>NO PLANNING PERMISSIONS GRANTED CONTRARY TO ENVIRONMENT AGENCY ADVICE ON FLOOD RISK AND WATER QUALITY GROUNDS.</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<p data-bbox="277 197 600 229"><u>Sustainable land use</u></p> <p data-bbox="277 301 752 453"><u>To make the best and most efficient use of land to support sustainable patterns and forms of development.</u></p>	<p data-bbox="965 197 1451 269"><u>Planning permissions granted and completed.</u></p>	<p data-bbox="1659 197 2085 309"><u>95% of major planning permissions started within a 3 year period.</u></p>
<p data-bbox="277 505 770 577"><u>Heritage (including architectural and archaeological heritage)</u></p> <p data-bbox="277 649 779 1008"><u>To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.</u></p>	<p data-bbox="965 505 1458 617"><u>Number of heritage assets on Historic England’s Heritage at Risk Register.</u></p>	<p data-bbox="1659 505 2141 617"><u>A reduction in the number of heritage assets on the Heritage at Risk register.</u></p>
<p data-bbox="277 1056 640 1088"><u>Flood risk management</u></p> <p data-bbox="277 1160 781 1311"><u>To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</u></p>	<p data-bbox="965 1056 1424 1168"><u>Number of planning permissions granted contrary to Environment Agency advice.</u></p> <p data-bbox="965 1240 1476 1351"><u>Number and location of Environment Agency flood warnings issued across Merton each year.</u></p>	<p data-bbox="1659 1056 2130 1168"><u>No planning permissions granted contrary to Environment Agency advice.</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<p data-bbox="277 201 725 272"><u>Climate change – operational carbon savings</u></p> <p data-bbox="277 344 781 536"><u>To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon Merton by 2050.</u></p>	<p data-bbox="965 201 1485 352"><u>Average percentage improvement in operational carbon emissions against Part L of the Building Regulations.</u></p> <p data-bbox="965 424 1464 616"><u>Monitoring changes to Part L of the Building Regulations and the London Plan in case these result in changes to Merton’s policies and targets.</u></p>	<p data-bbox="1659 201 2154 272"><u>Carbon reduction targets set out in policy CC2.2.</u></p> <p data-bbox="1659 472 2145 544"><u>Monitoring and updating the Local Plan as required.</u></p>
<p data-bbox="277 671 546 703"><u>Carbon offsetting</u></p> <p data-bbox="277 775 741 927"><u>To offset any carbon shortfall from development where zero carbon cannot be achieved on site.</u></p>	<p data-bbox="965 671 1458 743"><u>Carbon offsetting proposed where on site reduction is not achievable.</u></p> <p data-bbox="965 815 1442 887"><u>Monitoring changes to the carbon offset price.</u></p>	<p data-bbox="1659 671 2136 743"><u>Reporting on carbon offsetting in Infrastructure Funding Statement.</u></p> <p data-bbox="1659 879 2145 951"><u>Monitoring and updating the Local Plan as required.</u></p>
<p data-bbox="277 1023 450 1054"><u>Energy use</u></p> <p data-bbox="277 1126 759 1198"><u>To manage and reduce demand for energy.</u></p>	<p data-bbox="965 1023 1447 1094"><u>Energy Use Intensity (kWh/m2/yr) for developments</u></p>	<p data-bbox="1659 1023 2119 1094"><u>Energy Use Intensity targets set out in policy CC2.3 from 2025</u></p>
<p data-bbox="277 1206 557 1238"><u>Embodied Carbon</u></p> <p data-bbox="277 1326 786 1398"><u>To manage and reduce embodied carbon.</u></p>	<p data-bbox="965 1206 1473 1318"><u>Embodied carbon (kgCO2/m2) from large developments which submit a Whole Life Cycle Assessment</u></p>	<p data-bbox="1659 1206 1845 1238"><u>Best practice</u></p>

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

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
	<p><u>Environment Agency across Merton annually.</u></p> <p><u>Water quality status of water bodies across borough.</u></p> <p><u>Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.</u></p>	
<p><u>Open space and nature</u></p> <p><u>To protect, connect and enhance Merton’s natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</u></p>	<p><u>Net loss of designated open space for development.</u></p> <p><u>Metres of main river improved and restored across Merton.</u></p> <p><u>Biodiversity Net Gain delivered across Merton.</u></p>	<p><u>No net loss of designated open space.</u></p>
<p><u>Sustainable transport</u></p> <p><u>To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</u></p>	<p><u>Overall sustainable mode share.</u></p> <p><u>Uptake of low emission vehicles.</u></p>	<p><u>Increase in overall sustainable mode share based on a rolling three year average.</u></p> <p><u>Increase in registered EV vehicles in Merton – measured annually.</u></p>
<p><u>Health and wellbeing</u></p>	<p><u>Delivery of healthcare facilities identified in Merton’s Local Plan.</u></p>	<p><u>n/a (Monitoring will be reported in the Health and Wellbeing Strategy</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<p><u>To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</u></p>	<p><u>Number of people taking up physical activities and stating they are in ‘good health.’</u></p> <p><u>Number of Health Impact Assessments (HIA) carried out.</u></p>	<p><u>annual update known as the Merton Story and added to the AMR.)</u></p> <p><u>All development proposals that meet the Local Plan policy requirements to submit a Health Impact Assessment.</u></p>
<p><u>Housing</u></p> <p><u>To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton’s demographic changes and local housing demand.</u></p>	<p><u>Progress against borough wide affordable housing targets.</u></p> <p><u>Number of homes built each year.</u></p>	<p><u>Building regulation M4(3) – 10% of all new build self-contained homes.</u></p> <p><u>M4(2) – 90% of all new build self-contained homes.</u></p> <p><u>50% of new homes borough wide to be affordable across the plan period.</u></p> <p><u>Of affordable homes, 70% to be low-cost rent</u></p> <p><u>30% to be intermediate tenure.</u></p>
<p><u>Safe environments</u></p>	<p><u>Number of Health Impact Assessments carried out and type of development.</u></p>	<p><u>Health Impact Assessments carried out for all developments required by policy.</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>
<p><u>To contribute to safe and secure environments for all people including people with Protected Characteristics.</u></p>		<p><u>Increase in % of people feeling safe as measured in Merton Residents Survey.</u></p> <p><u>Yearly decrease in serious crime and crime against people with Protected Characteristics.</u></p>
<p><u>Infrastructure</u></p> <p><u>To ensure that environmental, social and physical infrastructure is managed and delivered to support demographic change.</u></p>	<p><u>Delivery of infrastructure projects identified in the Infrastructure Delivery Plan.</u></p>	<p><u>Number of infrastructure projects delivered.</u></p>
<p><u>Design</u></p> <p><u>To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</u></p>	<p><u>Increase in number of major schemes reviewed by the Design Review Panel at pre – application stage.</u></p>	<p><u>% of planning appeals allowed by the Planning Inspector for applications originally refused for design reasons by the council.</u></p>

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

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

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

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

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

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

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

