

LBM33 Habitat Regulation Assessment Report on the Post Hearings
Main Modifications of the draft Local Plan
January 2024



HRA summary

- i. As required under the Conservation of Habitats and Species Regulations - an assessment of the *'likely significant effects'* must be undertaken see Appendix A. For this HRA a risk based approach involving the application of the precautionary principle will be adopted in the assessment, such as the conclusion of *'no likely 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 in the HRA catchment area as agreed with Natural England
- ii. The review of the Main Modifications (MMs) is set out in Appendix A. It identifies the proposed change, the reasons for this and whether the change alters the conclusions of previous HRA such and importantly if an additional assessment is required namely an Appropriate Assessment. The proposed MMs relate to the following principal changes:
 - Changes for clarity and improve policy effectiveness.
 - To ensure the policy is 'Sound'.
 - Considerations raised by the Planning Inspectors - for example previously proposed Additional Modifications (AMs) to be changed to a MMs.
 - To ensure conformity with the National Planning Framework (NPPF)

Habitat Regulation Assessment (HRA) legislation

- iii. The HRA refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):
 - SACs are designated under the European Habitats Directive and target particular habitat types (Annex 1) and species (Annex II). The listed habitat types and species (excluding birds) are those considered, to be most in need of conservation at a European level.
 - SPAs are classified in accordance with Article 4(1) of the European Union Birds Directive for rare and vulnerable birds (as listed in Annex I of the Directive), and under Article 4(2) for regularly occurring migratory species not listed in Annex I.
- iv. The assessment must also consider potential SPAs, candidate SACs, Sites of Community Importance (SCIs) and Ramsar sites. Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).

v.

The overall purpose of the HRA is to conclude whether or not a proposal or policy, or development plan, would adversely affect the integrity of the European site, either alone or in combination with other plans and projects. This is judged in terms of the implications of the plan for the 'qualifying features' for which the European site was designated:

- SACs – Annex I habitat types and Annex II species
- SPAs – Annex I birds and regularly occurring migratory species not listed in Annex I
- Ramsar sites – the reasons for listing the site under the Convention

HRA stages and methodology

Figure 1: Habitats Regulation Assessment stages.

Habitats Regulation Assessment		Outcome
<p>Stage 1: Screening (Significance test)</p>	<ul style="list-style-type: none"> • Identification of European Sites both within Merton's boundary, within 15 km of the boundary and/or within the potential influence of the plan. • Examine conservation objectives (if available) • Analyse the policy/plan and its key components • Identify potential effects on European Sites • Examine other plans and programmes that could contribute to 'in combination' effects • Information was obtained for each European Site, based on publicly available information and consultation with Natural England where appropriate. • This included information relating to the sites' qualifying features; conservation objectives (where available) vulnerabilities/ sensitivities and geographical boundaries. • <i>If no effects likely report that no significant effect.</i> • <i>If effects are judged likely or uncertainty exists- the precautionary principle applies proceed to stage 2</i> 	<p>Where effects are unlikely, prepare a 'finding of no significant effect report.'</p> <p>Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.</p>
<p>Stage 2: Appropriate Assessment (the 'Integrity Test')</p>	<ul style="list-style-type: none"> • Collate information on sites and evaluate impact in light of conservation objectives • Consider how plan 'in combination' with other plans and programmes will interact when implemented (the Appropriate Assessment) • Consider how effect on integrity of site could be avoided by 	<p>Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through firstly avoidance, and secondly, mitigation including the mechanisms and timescale for</p>

	<p>changes to plan and the consideration of alternatives</p> <ul style="list-style-type: none"> • Develop mitigation measures (including timescale and mechanisms) • <i>Report outcomes of AA (Appropriate Assessment) and develop monitoring strategies</i> • <i>If effects remain following the consideration of alternatives and development of mitigations proceed to stage 3</i> 	<p>these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.</p>
<p>Stage 3: Assessment where no alternatives and adverse impacts remain</p>	<ul style="list-style-type: none"> • Identify ‘imperative reasons of overriding public interest’ (IROPI) • Identify/ develop potential compensatory measures • Difficult test to pass, requirements are onerous and untested to date. 	<p>This stage should be avoided if at all, possible. The test of IROPI and the requirements for compensation are extremely onerous.</p>

vi. In assessing the effects of Merton’s submission Local Plan in accordance with Regulation 102 of the Conservation of Habitats and Species Regulations 2012, there are potentially two tests to be, applied by the competent authority: a ‘*Significance Test*’, followed, if necessary, by an Appropriate Assessment, which will inform the ‘*Integrity Test*’. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 102(1) (b), consider whether the plan is directly connected with or necessary to the management of the sites (this stage is undertaken at stage 1), If not
- Step 2: Under Reg. 102(1) (a) consider whether the plan is likely to have a significant effect on the site, Either alone or in combination with other plans or projects (the ‘Significance Test’). (This stage is undertaken at stage 1) If yes,
- Step 3: Under Reg. 102(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the ‘Integrity Test’). In so doing, it is mandatory under Reg. 102(2) to consult Natural England, and optional under Reg. 102(3) to take the opinion of the public. (This step is undertaken during Stage 2: Appropriate Assessment).
- Step 4: In accordance with Reg.102(4), but subject to Reg.103, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

vii. It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is understood that ‘*imperative reasons of overriding public interest*’ (IROPI) are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission. The ‘competent authority’, in this case Merton Council, should undertake the HRA.

Case law

- viii. This HRA has been prepared in accordance with relevant case law findings, including most notably the ‘People over Wind’ and ‘Holohan’ rulings from the Court of Justice for the European Union (CJEU). The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage.
- ix. The precise wording of the ruling is as follows:
Article 6(3)must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.
- x. The Court of Justice of the European Union (CJEU) held that any measures intended to avoid or reduce the harmful effects of a project on a site should not be considered at the screening stage. The CJEU said that to do so would compromise the practical effect of the Habitats Directive in general. It also noted that the purpose of the assessment stage could be undermined and circumvented if this occurred. Although the term 'mitigation measures' is not referenced in the Habitats Directive, the CJEU noted that it should be understood as meaning measures that are intended to avoid or reduce the harmful effects of the proposed project on the site concerned. The European Court of Justice (ECJ) interpreted this to mean that if a project is likely to have a significant adverse effect on a European site, it should be subject to an appropriate assessment, regardless of any proposed mitigation measures intended to avoid or reduce the identified harmful effects of the development.
- xi. While the overall effect of this ruling is that many plans and projects which would not have previously required a full HRA may now be required to undertake one, the key question is to consider is what aspects, if any, of the proposed plan or project count as ‘mitigation measures’ (i.e. with respect to reducing or avoiding significant impacts on the relevant protected habitats) and what aspects can be considered to be a central part of the plan or project being proposed. A recent UK High Court ruling in August 2018 (R (on the application of Langton) v Defra (EWHC 2190 Admin) confirmed that conditions on badger cull licences were not ‘mitigation measures’ and therefore could be considered for the purposes of habitats screening.
- xii. In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Plan could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage. The council considers none of the emerging policies or proposed site allocations in the Plan, contain any aspects that could reasonably be identified as a ‘mitigation measure’ which has been specifically designed to avoid or eliminate potential significant effects on the relevant habitats arising from the implementation of the Plan. However, we acknowledge that certain policy criteria may help to reduce potential impacts, this is an integral part of the proposed Plan and are not included with the intention of mitigating significant impacts on protected habitats.

xiii. This HRA also fully considers the *Holohan v An Bord Pleanala* (November 2018) judgement which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the ‘appropriate assessment’ must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

xiv. The approach to the HRA also takes into consideration the ‘Wealden’ judgement and the ‘Dutch Nitrogen Case’ judgements from the Court of Justice for the European Union.

xv. The 2018 ‘Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen)’ judgement stated that:

...the positive effects of the autonomous decrease in the nitrogen deposition...be taken into account in the appropriate assessment..., it is important that the autonomous decrease in the nitrogen deposition be monitored and, if it transpires that the decrease is less favourable than had been assumed in the appropriate assessment, that adjustments, if required, be made.

xvi. The Dutch Nitrogen judgement also states that according to previous case law:

...it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the ‘appropriate assessment’ within the meaning of Article 6(3) of the Habitats Directive.

Conclusion

xvii. The screening of the proposed Main Modifications (Appendix A) and the Modifications to the Policies Map (Appendix A1) has found they would not, lead to any ‘likely significant effects’ on any European sites (alone or in combination).

- xviii. This HRA report concludes the general findings of the submission HRA (OD12) and HRA (LBM08 Main Modifications May 2022) remain – namely ‘*no likely significant effect*’ on the European sites based on known information at the time of writing. Consequently, there is no requirement for Appropriate Assessment.

HRA Consultation

- xix. The Habitats Regulations requires plan making/competent authority to consult with Natural England (environmental statutory body). The Habitats Regulations gives responsibility for consultation with other bodies and the public to the discretion of the plan-making authority. Where possible the guidance recommends that this consultation be,
- xx. undertaken alongside the consultation for the Plan. Also, send a copy of this HRA Report, to Natural England, Environment Agency (EA) and Historic England (HE) for consideration, comments and advice.

Main Habitats Regulations Assessment report

1. Introduction

- 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 ([OD12](#)) report was submitted alongside the Plan. Throughout the HRA process the council consulted with Natural England, other stakeholders and the public. 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. As part of the planning process in May 2022 a HRA ([LBM08](#)) was carried out to assess proposed modifications following the Inspectors Preliminary Questions letters.
- 1.2. The public Examination of the Plan was held in June (stage one) and October (stage two) in 2022. In March 2023, the council, received a Post Hearing Letter ([INSP22](#)) and the Post Hearings clarification letter dated 28th April 2023 ([INSP23](#)). The letters specified that they consider that further Main Modifications (MMs) are necessary for reasons of soundness and legal compliance. This report is assessing these matters and proposed MMs. It must be noted that this HRA is only looking at MMs and not at Additional Modifications (AMs). Reasoning being that AMs are not subject to HRA as they are unlikely to result in negative impacts or significant negative effects to European sites. AMs tend to be grammatical corrections.
- 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. Main Modifications must resolve any issues in order to make the Local Plan 'justified' or improve the effectiveness of the policy. 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 (NPPF).
- 1.4. The draft Plan's aim is to steer development actively away from ¹European Sites and associated sensitive areas. The purpose of this HRA is to consider whether the MMs proposed at this stage would:
 - Lead to any new effects on any European sites (alone or in combination) that have not been considered by the HRA to date.
 - Alter the findings of the submitted HRA ([OD12](#)) for example the findings and/or conclusions.
- 1.5. As set out in Merton Council's Hearing Statement in response to the Inspector's questions ([Matter 1](#): issue 3 particularly question 6 and Appendix 1), we continue to use the term "European sites" for consistency in this HRA and other documents in Merton's Plan, having

¹ The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites and Ramsar sites (international designated under the Ramsar Convention). Government's January 2021 publication - Changes to the Habitats Regulations 2017 sets out the differences between the 2017 Regulations and the post-Brexit situation. However, as this change came into focus during the Plan development and to avoid any confusion the council for now are still referring to these sites as 'European Sites'

considered the regulatory changes that came into force in January 2021 following the UK's departure from the European Union. An informative clarity on the use of the term 'European sites' and the replacement laws for European Directives (Appendix C to this HRA).

- 1.6. [In July 2022, the Department of Levelling up, Housing and Communities \(DLUHC\)](#), issued a Ministerial update on nutrient neutrality and habitats regulations assessment. The update provides further details in relation to the rollout of nutrient neutrality advice to additional catchments in the March 2022 statement.
- 1.7. Nutrient pollution in rivers, lakes and estuaries has an adverse effect by causing eutrophication and algal blooms, harming delicate ecosystems. Some areas are protected as Habitat Sites and under the Habitats Regulations. Competent authorities must carefully consider the impacts of any new plans and projects on habitats sites, and whether those impacts may have an adverse effect on the integrity of a habitat site which requires mitigation. Areas where there is a potential for harm to a failing habitats site due to additional nutrients can receive nutrient neutrality advice, meaning that additional nutrient impact from development must be mitigated. There are currently twenty-seven nutrient pollution catchment areas, none in the Greater London area.
- 1.8. Through the [Levelling Up and Regeneration Bill 2023](#), the government has placed a new duty on water and sewerage companies to upgrade their wastewater treatment works by 2030 in areas where habitats sites are in 'unfavourable condition'. During the plan's development the council engaged with the water companies regarding policies and proposed site allocations and uses. Statements of Common Ground between the council, water and wastewater statutory undertakers in Merton: Thames Water and SES water and relevant matters on delivery have been included in the relevant site allocations has been produced.
- 1.9. Many of the internationally important water dependent places (lakes, rivers, estuaries, etc) are designated as protected under the Conservation of Habitats and Species Regulations 2017 (as amended) known as Habitats Sites. When local authorities assess projects and planning applications, consideration is given to whether the plan or project is likely to have significant effects on the Habitats Sites by way of an HRA.

2. Identification of European Sites and characterisation

- 2.1. There are two European sites which are immediately relevant for Merton. One is within the borough boundary, Wimbledon Common and the other is Richmond Park (a Royal Park) which is 3-4km away at its furthest in the adjoining borough of Richmond upon Thames. It has been agreed with Natural England that 15km is a suitable catchment to identify Habitats Regulations designated sites, as the effects of a plan can go beyond its boundary.
- 2.2. Beyond these two sites, there are several sites outside London such as the Thames Basin Heaths, the Windsor Forest Great Park and the Mole Gap to Reigate Escarpment, which are too far away to be considered relevant. In addition, a part of the South West London Water bodies is beyond the 15km catchment. Therefore, the potential impacts of the Plan will be screened on the conservation objectives of Wimbledon Common and Richmond Park. The description and the reason for their designation are set out below.

Wimbledon Common

- 2.3. Wimbledon Common is designated as a Special Area of Conservation (SAC) in 2005, Site of Special Scientific Interest (SSSI) and Water Framework Regulations England and Wales, still referred to as WFD for ease of reference. WFD introduced a comprehensive river basin management planning system to help protect and improve the ecological health of our rivers, lakes, estuaries and coastal and groundwaters. The main aims of the WFD are to prevent deterioration and enhance the status of aquatic ecosystems, including groundwater, promote sustainable water use and reduce pollution.
- 2.4. The SAC and its natural habitats and/or species 'Qualifying Features' - listed below (please note are subject to natural change):
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats.
 - The structure and function of the habitats of qualifying species.
 - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.
 - The populations of qualifying species and
 - The distribution of qualifying species within the site
- 2.5. The Common measures 351.38 ha and is 1.5km to the northwest of Wimbledon town centre and 1km of Richmond Park. A considerable amount of the SAC designation can be within Merton and a smaller area within Putney Heath (London Borough of Wandsworth). The west of Wimbledon Common SAC also borders the Royal Borough of Kingston upon Thames.
- 2.6. The Common supports the most extensive area of open, wet heath on acidic soil in London. The site also holds a variety of other acidic heath and grassland communities reflecting the variations in geology, drainage and management. Associated with these habitats are several plants uncommon in the London area. The high plateau in the east and north of the site has a capping of glacial gravels overlying Claygate Beds and London Clay exposed on the western slope of the Common. The acidic soil and poor drainage of the plateau give rise to a mosaic of wet heath and unimproved acidic grassland. Semi-natural broadleaved woodland covers the deeper, clay soils of the western slope. The acidic grassland dominated by common bent *Agrostis capillaris* and sheep's fescue *Festuca ovina*, with soft rush *Juncus effusus* well represented where drainage is impeded.
- 2.7. Also, present are two locally uncommon grasses, wavy hair grass *Deschampsia flexuosa* and in damper depressions, purple moor grass *Molinia caerulea*. Typical herb species of unimproved grassland occur including heath bedstraw *Galium saxatile*, tormentil *Potentilla erecta*, harebell *Campanula rotundifolia*, and eyebright *Euphrasia officinalis*. Purple moor grass also characterises the ground flora beneath encroaching pedunculate oak birch woodland on the gravels of the plateau. A significant cover of heather *Calluna vulgaris* distinguishes areas of both dry and wet heath.

2.8. The Conservation Objectives for the European interests are subject to natural changes is *to maintain (implies restoration if the feature is not currently in favourable condition), in favourable condition, the heathland habitat and habitat for stag beetle*. Further information on the condition of the park can be found in Appendix B of this report.

Figure 2: Wimbledon Common SSSI condition summary.

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
94.99%	0.00%	94.99%	5.01%	0.00%	0.00%

Source: Natural England compiled September 2023

Figure 3: Features from overlapping site on Wimbledon Common.

Feature	Overlapping site	Site Designation
H4010 Northern Atlantic wet heaths with Erica tetralix	Wimbledon Common SAC	SAC
H4030 European dry heaths	Wimbledon Common SAC	SAC
S1083 Stag beetle, <i>Lucanus cervus</i>	Wimbledon Common SAC	SAC
Lowland dry acid grassland (U1a)	Wimbledon Common SSSI	SSSI
Lowland dry acid grassland (U1b, No suggestions)	Wimbledon Common SSSI	SSSI
Lowland dry acid grassland (U4)	Wimbledon Common SSSI	SSSI
Lowland dry heath	Wimbledon Common SSSI	SSSI
Lowland wet heath	Wimbledon Common SSSI	SSSI

Source: Natural England compiled September 2023

2.9. Other key environmental assets of Wimbledon Common:

- London Wildlife Trust managed - Local Nature Reserve Fishpond Wood
- Largest area of wet heath in London, areas of dry heath and one of London's very few sphagnum bogs
- High ground hosts an ancient tumulus and an ancient monument Caesar's Camp can be seen near the Royal Wimbledon Golf Course.

2.10. Wimbledon Common has many old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for the stag beetle, *Lucanus cervus*. The stag beetle is listed as an Annex II species in the Habitats Regulations and is a primary reason for the designation of this site. Wimbledon Common also supports several other scarce invertebrate species associated with decaying timber.

2.11. The following Annex I habitats are present as a qualifying feature; however, these are not a primary reason for designation of this site. Features of European Interest are the features for which a European site is selected. They include habitats listed on Annex 1 of the Habitats Regulations, species listed on Annex II of the Habitats Regulations and populations of bird species for which a site is designated under the Habitats Regulations.

- Northern Atlantic wet heaths with Erica tetralix
- European dry heaths

2.12. Current pressures on Wimbledon Common are:

- Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood).
- Habitat fragmentation.
- Invasive species (specifically oak processionary moth Thaumetopoea processionea).
- Atmospheric pollution (nitrogen deposition).

Richmond Park (Crown Land)

2.13. Richmond Park is designations as a National Nature Reserve, SSSI and SAC. The Park measures 856 ha and is located 1-3km from Wimbledon Common. Richmond Park is a Royal Park and is managed by the Department for Environment, Food and Rural Affairs (Defra). Richmond Park is managed as a royal deer park since the seventeenth century, producing a range of habitats of value to wildlife. Richmond Park is of importance for its diverse deadwood beetle fauna associated with the ancient trees found throughout the parkland. In addition, the Park supports the most extensive area of dry acid grassland in Greater London.

2.14. Richmond Park also supports nationally scarce species associated with dung and wetlands although these are generally not as threatened by habitat loss as the deadwood fauna. Approximately 135 beetle species have so far been recorded from wetland habitats and 75 species from dung, including the nationally restricted Aphodius zenkeri, rarely found outside deer parks due to its specific association with deer dung. None was specifically identified in the Natural England Site Improvement Plan, although loss of habitat (dead wood) would affect the stag beetle population. Further information on the condition of the park can be found in Appendix B of this report.

Figure 4: Richmond Park SSSI condition summary.

Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
100.00%	0.00%	100.00%	0.00%	0.00%	0.00%

Source: Natural England compiled September 2023

Figure 5: Features from overlapping sites – Richmond Park.

Feature	Overlapping site	Site Designation
S1083 Stag beetle, <i>Lucanus cervus</i>	Richmond Park SAC	SAC
Invert. assemblage A211 heartwood decay	Richmond Park SSSI	SSSI
Invert. assemblage A212 bark and sapwood decay	Richmond Park SSSI	SSSI
Invert. assemblage A213 fungal fruiting body	Richmond Park SSSI	SSSI
Lowland dry acid grassland (U1b, No suggestions)	Richmond Park SSSI	SSSI
Lowland dry acid grassland (U4/20)	Richmond Park SSSI	SSSI

Source: Natural England compiled September 2023

- 2.15. Both European Sites within Merton’s catchment have been designated primarily due to the presence of Stag beetles and Wimbledon Common for some secondary habitat protection. The main impacts identified are related to, the potential increased recreational use and the secondary impacts would be due to air pollution, increase in housing provision and transport use (emissions).
- 2.16. Stag Beetles are dependent on mature trees and deadwood therefore there is less concern that recreation will have an unduly detrimental impact on their habitat. The designated wet and dry heaths on Wimbledon Common could, however, be affected by trampling from walkers, dog walkers or other recreational users. Nevertheless, Wimbledon Common and Putney Heath Conservators and the Royal Parks Authority by way of provisions under the Anti-Social Behaviour, Crime and Policing Act 2014 (changes to the Act replaces Dog Control Orders) and other byelaws consider the management of the common and park, respectively a way of minimising potential impact.
- 2.17. The submission HRA identified the following pathways² of the Plan on the Europeans Sites including SAC as:
- Recreation and urbanisation.
 - Air pollution.
 - Non-physical disturbance (noise, vibration and light).

² Routes by which a change in activity within Merton can lead to an effect upon a European site.

3. Screening assumptions and information used in reaching conclusions about likely significant effects

- 3.1. As reported in the submission HRA, during the screening stage the draft policies and site allocations were, screened individually, which is consistent with current guidance. For some types of impacts, screening for *'likely significant effects'* has been determined on a proximity basis, using GIS (Geographic Information System) data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. It should be noted that loss of habitat from outside of the boundaries of a European site could still affect the site if it occurs in an area used for offsite foraging or roosting by the qualifying species of the site. For example, land in an area used for foraging or roosting by SPA birds for example would be functionally connected to a European site. Therefore, consideration has been given to whether the European sites close to Merton have mobile species amongst their qualifying features that could be affected by habitat loss resulting from development on functional land outside of the European site boundary.
- 3.2. Potential effects on functionally connected land will only be relevant in relation to Lee Valley SPA / Ramsar as this site has bird species as its qualifying features. The stag beetle is a qualifying feature of Wimbledon Common and Epping Forest SAC and may travel outside of the SAC boundaries; however, they will not travel far. Research suggests that 2km may be an appropriate buffer inside which sites could be functionally connected, as this is the distance that males travel to females during the breeding season. Epping Forest SAC is more than 2km outside the borough boundary and also outside the 15km HRA catchment area.

4. Interpretation of 'Likely Significant Effect'

- 2.1 Relevant case law helps to interpret when effects should be considered as a Likely Significant Effect, when carrying out HRA of a land use plan.
- 2.2 It was the [Waddenzee case \(European Court of Justice C-127/02\)](#) ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:
- An effect should be considered 'likely,' "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site"* (para 44).
- 2.3 An effect should be considered *'significant,' "if it undermines the conservation objectives"* (para 48).
- Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned"* (para 47).
- 2.4 An opinion delivered to the Court of Justice of the European Union commented that: "The requirement that an effect in question be significant" exists in order to lay down a de minimus threshold. Plans or projects that have no appreciable effect on the site are thereby, excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or

near the site would risk being impossible by reason of legislative overkill.”

- 2.5 The [Sweetman case \(European Court of Justice C-258/11\)](#) reinforced and further refined the Waddenzee case interpretation. The Advocate General’s Opinion stated *“the question is simply whether the plan or project concerned is capable of having an effect. It is in that sense that the English ‘likely to’ should be understood.”*

5. Potential Effects of Merton’s Local Plan

- 5.1. This section looks at the whole draft Plan and potential threats to the European Sites. Since the last HRA, ONS (Office for National Statistics) released data from the Census 2021. The initial findings are that Merton population has increased by 7% when compared to the previous census in 2011. This means Merton’s population on Census Day was 215,200. The census also found that the population density (person per kilometre) is 5,722 with the highest concentrations in the east of the borough.
- 5.2. It is recognised that during the height of the Covid-19 pandemic there were pressures on open spaces. During this unprecedented period, the recreational pressures on parks and open spaces increased due to local travel restrictions. This was also the case with both Richmond Park and Wimbledon Common where there was an increase of visitors, mainly by those who lived near the two European Sites. Analysis of the proposed pattern of development and site allocations within the Plan demonstrate that there is not a concentration of new development proposed within proximity to the European sites and more importantly the Plan actively directs development away from these sites.

Recreation and urbanisation/Visitor and recreational pressure

- 5.3. The habitats and species of the European Sites are known to be sensitive to recreational pressure, primarily dog walking. The Plan could have an adverse impact to the sensitivity by increasing the number of people accessing the European Sites. Other potential impacts include population growth, rise in housing development and possible upturn in work and travel patterns.
- 5.4. However, the management of Wimbledon Common and Putney Heath Conservators, the Royal Parks Authority and the use of legal instruments such as bylaws for example, [Wimbledon and Putney Commons Act, 1871](#), dog lead zones (during the bird/wildfowl breeding season) and dog control orders; are some of the tools which can assist in reduce and protect the Common from any potential unfavourable biodiversity and nature impacts.
- 5.5. The removal of deadwood on the Common (SAC) makes the heathland components and stag beetle (*Lucanus cervus*) populations potentially vulnerable to recreational pressure and / or incidental fires. The stag beetles are dependent on mature trees and deadwood for survival. The [Wimbledon Common SAC Site Improvement Plan](#) (Natural England 2014) identifies that removal of dead wood from the site by visitors may reduce the ability of the SAC to support stag beetle. However, the removal of deadwood is based on a personal decision of relatively few visitors and cannot be upscaled with surrounding residential growth.

- 5.6. The heathlands of the SAC are theoretically vulnerable to recreational pressure and Wimbledon Common generally (not just the SAC component) is a popular site for visitors and being an unfenced the whole area is open to the public 24 hours a day throughout the year. However, according to habitat mapping on MAGIC³ the heathland is only found in the northern part of the SAC. In contrast, the main hotspots for recreational usage are the grassland areas further south which do not contain SAC features. While the Natural England condition assessment for the SAC states that most of the heath fails to meet key targets for quality, the report also concludes that there are no indications of significant adverse impacts from trampling, burning or other recreational disturbance.
- 5.7. Potentially, site allocation Wi3 (the existing All England Lawn Tennis club site) could increase visitor number to the Common. It is considered that this is unlikely to be the case and the impact is considered to be low for a number of reasons. As mentioned in paragraph 5.6 the visitor hotspots are the grassland to the southern end of the Common. Visitors to the common tend to use this area as it is less dense and open section of the Common. Additionally, this part is closer to the Wimbledon Village with its shops and places to eat which support the alfresco outdoor summer picnic vibe.
- 5.8. The Wimbledon Championships at site Wi3 runs for a few weeks once a year and is an all-day ticketed event (approx. 11am-11pm), limiting opportunities for its visitors to use their Wimbledon Championships tickets effectively and also visit Wimbledon Common SAC, 0.8km walk away. Most visitors to the Wimbledon Championships at Site Wi3 walk either from Southfields underground station to the north or via Church Road from Wimbledon Station; there is also direct shuttlebus provision from Wimbledon train station to Site Wi3. We must also consider that, at 0.8km away, the walking distance to Wimbledon Common may be too far to walk to from the Wi3 site for some visitors and they prefer to stay, relax and soak up the atmosphere the main Championship venue or the adjacent Wimbledon Park.

Increased fly tipping

- 5.9. Fly tipping is the illegal deposit of waste on land contrary to Section 33(1) (a) of the Environmental Protection Act 1990. The types of waste fly tipped range from 'black bag' waste to large deposits of materials such as industrial waste, tyres, construction material and liquid waste. Fly tipping is a significant blight on local environments; a source of pollution; a potential danger to public health and hazard to wildlife. It also undermines legitimate waste businesses where unscrupulous operators undercut those operating within the law.
- 5.10. However, the council and the Environment Agency (EA) both have a responsibility in respect of illegally deposited waste. Local councils deal with most cases of fly tipping on public land, whilst the EA investigates and enforces against the larger, more serious and organised illegal waste crimes. Furthermore, the council can issue Fixed Penalty Notice for offences such as littering and fly tipping. Therefore, it is considered that there are no 'likely significant effects on fly tipping identified in relation to the European sites.

³ [Defra MAGIC](#)

Cat predation

- 5.11. The most recent figures are from the Mammal Society they estimate that the UK's cats catch up to 275 million prey items a year, of which 55 million are birds. This is the number of prey items that were, known to have been, caught. We do not know how many more the cats caught, but did not bring home, or how many escaped but subsequently died. The most frequently caught birds, according to the Mammal Society are probably (in order) house sparrows, blue tits, blackbirds and starlings. However according to the RSPB despite the large numbers of birds killed, there is no scientific evidence that predation by cats in gardens is having any impact on bird populations UK-wide. This may be surprising, but many millions of birds die naturally every year, mainly through starvation, disease, or other forms of predation. There is, however, evidence that cats tend to take weak or sickly birds as prey.
- 5.12. *Effect of the Plan on the European Sites:* No 'likely significant effects' of recreation and urbanisation pressures identified. The nearest site allocation, Wi3, is more than 200m away from Wimbledon Common SAC and is not allocated to deliver homes or other facilities where pets could live. Furthermore, existing legislative powers such as for fly tipping will assist in managing the Common and are enforceable by the council and other statutory bodies.

Atmospheric Pollution (Air pollution)

- 5.13. In accordance with Environment Act 1995 local authorities must assess and review the quality of air in their respective areas. This is done by way of a [Local Air Quality Management \(LAQM\) Plan](#), as well as regular reviews and assessment of air quality in the borough. The LAQM determines whether the air quality objectives are being met.
- 5.14. Emissions from the road traffic is the highest contributor to air pollution followed by emissions from coal-fired power stations and then industry in the UK. Surprisingly, agricultural practices are a prominent source as it collectively produces 88% of the UK's ammonia gas. This gas combines with other naturally occurring substances and produces a particulate matter which is harmful to humans. Eighty per cent of nitrogen dioxide (NO₂) comes from internal combustion engines. The huge increase in the number of cars on the roads means there is now one car for every two people living in England. This not only has a significant impact on air quality but also produces adverse effects such as noise pollution, lack of physical exercise and injuries due to road traffic accidents.
- 5.15. Air pollution can have both long and short term effects on health, and some groups of people are more susceptible than others. People with existing respiratory problems with their heart and/or lungs will be seriously affected by air pollution.
- 5.16. The Wealden judgement (2017) has 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.

- 5.17. The major roads within 200m (0.2km) of the European sites and still within 15km of Merton are as follows:
- A3 London Road as known as the Portsmouth Road including the Kingston-By-Pass
 - A219 (Parkside)
 - A306 (Roehampton Road)
 - A308 (Kingston Hill)
- 5.18. Wimbledon Common SAC is the only habitats site where air pollution is cited as an identified pressure. The main pollutants of concern for European sites are oxide of nitrogen (NO_x (nitrogen oxides) ammonia (NH₃) and sulphur dioxide (SO₂). NO_x can have a directly toxic effect upon vegetation. In addition, NO_x or ammonia concentration deposition within the atmosphere will lead to greater rates of nitrogen deposition into soil which can have a serious harmful effect on the quality of semi natural habitats. Both the dry and wet heathland vegetation qualifying features of the Wimbledon Common SAC are potentially sensitive to pollution originating from traffic.
- 5.19. However, levels of poor air quality around Wimbledon Common is low. This is due to the make-up of the Common, for example its size, number of trees and vegetation; all of which help to reduce air pollution; both by directly removing pollutants and reducing air temperatures. The modelled annual mean NO₂ deposition based on estimates for 2020, for the strategic roads surrounding the SAC indicate that the A3 fails the annual mean objective (<49ug/m³), whereas the A219 and A306 do not, although there is potential for them to also fail should traffic flow increase significantly.
- 5.20. The 2019 [London Atmospheric Emissions Inventory \(LAEI\)](#) data indicates that the proposed increase in Annual average daily traffic (AADT) on roads within 200m of the Wimbledon Common SAC is significantly less than the 1,000 AADT screening threshold. Therefore, it is considered that the proposed development within the borough does not have the potential to increase air pollution which could have a likely significant effect on the integrity of the Wimbledon Commons Special Area of Conservation.
- 5.21. Effect of the Plan on the European Sites: No “likely significant effects” of non-physical disturbance (atmospheric pollution) identified in relation to the European sites.

Non-physical disturbance - noise, vibration and light

- 5.22. Noise and vibration effects during the construction of new developments are most likely to disturb bird species and thus a key consideration with respect to European sites where birds are the qualifying features. Such effects may also impact upon some mammals and fish species. Noise from construction will be managed through planning conditions and legislations (planning and/or environmental protection).
- 5.23. Artificial lighting at night (for example streetlamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species and therefore have an adverse effect on the integrity of European sites. Where bats or nocturnal birds are a qualifying feature. The effects of noise, vibration and light are most likely to be significant if development takes place within 500m of a European site with qualifying features sensitive to these disturbances. The draft Plan expects new developments to be designed to

minimise light pollution from internal and external lighting, reducing any impact on wildlife, nature designations and blue infrastructure such as along the River Wandle. None of the Plan's proposed policies or site allocations lie within 500m of a European site.

- 5.24. *Effect of the Plan on the European Sites:* No 'likely significant effects' of non-physical disturbance (noise, vibration and light) identified in relation to the European sites.

Water quantity and quality

- 5.25. The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts such as high levels of toxic chemicals and metals can result in immediate death of aquatic life and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. An increase in demand for water abstraction and treatment resulting from the growth proposed in the Plan could result in changes in hydrology at European sites, specifically a decrease in water quality or changes to water levels. There could be a 'likely significant effect' on site integrity depending on the qualifying features and particular vulnerabilities of the European sites.
- 5.26. The proposed development that will be delivered by way of the Plan could increase demand for water abstraction and treatment, which could affect the integrity of European sites as a result of changes to hydrological regimes. Residential development is likely to result in the most significant increases in demand for water abstraction and treatment, although employment development is also likely to contribute to increases. It is not believed that there are any concerns with the change to the Plan's period collectively companies have recognised the need to improve water quantity and quality by boosting supply, reducing leaks and reducing usage. The water companies covering Merton have all produced plans covering period that is substantially greater period than the Local Plan. The [Thames Water Drainage and Wastewater Management Plan 2025-2050](#), [Shape your water future Our Water Resources Management Plan 2020 – 2100](#) and Sutton and East Surrey [Draft Water Resources Management Plan 2025 - 2075](#). These plans recognise that London's population is growing and there is need for more homes in the capital. These pressing issue have be factored into their plans with reviews being carried out between 1-3 years against targets and milestones.
- 5.27. The European sites within and around the borough are unlikely to be significantly affected in this way as the provision of housing will largely be achieved through the redevelopment of existing urban areas and will therefore utilise existing infrastructure, including foul water and surface drainage facilities.
- 5.28. In addition, Thames Water's extensive sewer upgrading project across the capital, will also help to accommodate population growth across London, including tackling the problems caused by overflow from the city's Victorian system of sewers. There are also established regulatory mechanisms over the treatment of waste water (regulated by the Environment Agency) that consider environmental impacts including likely significant effects on European sites, which should provide safeguards to ensure no adverse effects on integrity arise.

- 5.29. [Thames Water Utilities Ltd](#) (TWUL) and [Sutton and East Surrey Water](#) (SES) supplies water in Merton. TWUL has a duty as a statutory water undertaker to provide clean and wastewater services and is responsible for the management, maintenance and operation of flood control structures under their ownership. Water Companies are defined as a Risk Management Authority within the Flood Water Management Act and are responsible for flood risk management functions in accordance with the Water Resources Act 1991 and the Land Drainage Act 1991. TWUL is responsible for, surface water drainage from development via adopted sewers and for maintaining trunk sewers into which many of the highway drainage in the study area connects.
- 5.30. [Thames Waters Water Resources Management Plan Annual Review 2020-21](#) outlined that there is sufficient and secure water supply in London and the objectives set out in the Water Resource Management Plan (2019) were being met. Although, it is acknowledged that in the long term more water resources will be required, and as part of this are exploring a range of options to facilitate this, including catchment solutions, third party options, and securing resilience for the public water supply and other sectors
- 5.31. *Effect of the Plan on the European Sites:* No 'likely significant effects' based on water quantity and quality identified in relation to the European sites.

Nutrient neutrality

- 5.32. Nutrient pollution is a particular problem for freshwater habitats and estuaries. Increased levels of nutrients (especially nitrogen and phosphorus) can speed up the growth of certain plants, disrupting natural processes and changing wildlife. This process damages water dependent sites, harming the plants and wildlife, and affects the oxygen carrying capacity of the water. In technical terms it can put sites in 'unfavourable condition'. The sources of excess nutrients are site specific, but predominantly originate from wastewater treatment works and agricultural pollution.
- 5.33. Wetlands and water management has become an increasingly important part of protecting habitats in Merton. There are currently nine ponds in varying in size and depth located around Wimbledon Common (and Putney Heath) which are important for the diversity of wildlife. Each of the ponds has a specific set of management objectives that are required to ensure the ongoing protection of these special sites. Located within the surroundings of a largely urban landscape, all the Commons' ponds are exposed to ongoing pressures such as pollution, recreational damage and the introduction of non-native invasive flora and fauna.
- 5.34. *Effect of the Plan on the European Sites:* No 'likely significant effects' of non-physical disturbance (nutrient neutrality) has not been identified in relation to the European sites.

6. In combination effects

- 6.1. It is a requirement of the Habitats Regulations to consider the effects of projects or plans "in combination" at the screening stage. Articles 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in combination with other plans or projects. The 'in-combination' requirement is undertaken in order to make

sure that prior to their authorisation the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

- 6.2. The submission HRA looked at the in-combination effects of neighbouring boroughs. Since then, there have been some changes to their Local Plans and more up to date HRA carried out by the local authorities. Figure 6 has been updated accordingly.
- 6.3. The Habitats sites considered in this assessment alone sit within the geographical area surrounded by six boroughs within Greater London: Richmond upon Thames, Wandsworth, Sutton, Lambeth, Kingston and Croydon. The London Plan developed by the Greater London Authority (GLA) also covers Merton. Neighbouring boroughs Local Plans and HRA have been reviewed as part of the in-combination assessment.

Figure 6: In combination findings.

Local authority	Housing	Transport	The authority HRA findings.	This HRA comment(s)
The London Plan 2021	522,870 from 2019/20 -2028/29	None identified	<i>It was concluded that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects.</i>	N/A.
Croydon Local Plan 2018 and Local Plan review The Regulation 19 Consultation took place between January – February 2022. 1. Proposed submission consultation: January to February 2024 2. Submission of plan to Secretary of State: Summer 2024 3. Local plan examination anticipated during late 2024 (subject to	Seeking to deliver a minimum of 41,580 homes between 2019 - 2039 in their Local Plan.	None identified.	Croydon’s HRA concluded <i>However, it can be concluded that due to a general absence of either impact pathways or, in the case of the stag beetle interest features of Wimbledon Common SAC and Richmond Park SAC, a general resilience to housing and employment growth, no adverse effect on any SAC will result from the CLPR.</i> <i>This matches the conclusion drawn in the HRA for the London Plan.</i> 6.4 <i>It can be concluded that the Plan document will not result in an adverse effect on the integrity of</i>	Development identified in Croydon Council’s Local Plan are unlikely to have any likely significant adverse effects on the European sites.

Local authority	Housing	Transport	The authority HRA findings.	This HRA comment(s)
<p>availability of inspectors)</p> <p>4. Local plan adoption anticipated December 2025</p>			<p><i>any international sites either alone or in combination.</i></p>	
<p>Wandsworth Local Plan adopted 2016 and 2018 (various Development Plan Documents). Replaced July 2023 Wandsworth Local Plan review submitted to Secretary of State in April 2022 and adopted July 2023.</p> <p>Partial review of Wandsworth Local Plan (affordable housing policies only) published for Reg 18 consultation October-December 2023</p>	<p>The London Plan sets a target for Wandsworth of 19,500 additional homes to be provided over a ten-year period (2019/20 to 2028/29).</p>	<p>None identified.</p>	<p>Local Plan Publication (Regulation 19) Version January 2022 concluded <i>'This screening assessment of the DWLP has not identified any likely significant effects or impacts on the integrity of any European Site'.</i></p>	<p>Development identified in Wandsworth Council's Local Plan are unlikely to have any likely significant adverse effects on the European sites.</p>
<p>Sutton Local Plan 2016 -2031</p>	<p>The council will enable the delivery of new homes to help meet London's housing needs and local housing needs by aiming to deliver at least 6,405 new homes over the plan period (2016-2031 – 427 homes per year), subject to any subsequent borough target approved by the Mayor of London over the plan period</p>	<p>None identified.</p>	<p><i>The Council conclusion that none of the emerging policies options or site allocation was likely to have a significant effect. This was endorsed by Natural England.</i></p>	<p>Development identified in Sutton's Council's Local Plan are unlikely to have any likely significant adverse effects on the European sites.</p>
<p>Lambeth Local Plan adopted 2022-2035 (adopted in 2021).</p>	<p>The council seeks to maximise the supply of additional homes in the borough to meet and exceed Lambeth's housing</p>	<p>None identified</p>	<p><i>The HRA concluded 'In summary, this screening assessment on the DRLLP PSV 2020 has not identified</i></p>	<p>Development identified in Lambeth Local Plan are unlikely to have any likely significant adverse effects on the European sites.</p>

Local authority	Housing	Transport	The authority HRA findings.	This HRA comment(s)
	requirement of 13,350 homes for the ten-year period 2019/20 to 2028/29 in their adopted Local Plan.		<i>any likely significant adverse effects on any European Site. Similarly, it is considered that the DRLLP PSV 2020 will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the DRLLP PSV 2020 for Lambeth borough’.</i>	
<p>Kingston Adopted Core Strategy (2012).</p> <p>The Royal Borough of Kingston Upon Thames are currently producing a new Local Plan for Kingston. At the time of writing this HRA - Publication version (Regulation 19): spring/summer 2024</p>	Minimum target is 9,640 homes between 2019/20 and 2028/29 (Draft Local Plan – Reg 18: dated 28 November 2022 - 28 February 2023).	None identified	<p>Kingston Local Plan Habitats Regulations Screening Assessment (November 2022)</p> <p><i>It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging RBKT Local Plan when considered with other strategic plans based on the findings of this screening assessment and a review of the HRAs supporting Local Plans for adjacent authorities.</i></p>	<p>Kingston Council’s Habitats Regulations Screening Assessment (Nov 2022) was based on screening Kingston’s draft (Regulation 18). It stated that it could not rule out an in-combination effect as a result of policies in Kingston’s emerging Plan when considered with other strategic plans.</p> <p>Kingston’s HR Screening Assessment also states that when considering their proposed Site Allocation SA22, <i>at this screening stage it is not possible to rule out potential effects on Wimbledon Common SAC due to changes in air quality and recreational pressures.</i> This is related to their site allocation known as SA22 Kingston University, Kingston Hill Campus which measures 15.71 ha. This site is an established campus of Kingston University including educational buildings and halls of residence.</p> <p>It is proposed for allocation as a “longer-term potential development site”, according to Kingston’s Interim Integrated Impact Assessment Report December 2022 “means residential and non</p>

Local authority	Housing	Transport	The authority HRA findings.	This HRA comment(s)
				<p>residential allocations for this Site have not yet been made". SA22 is proposed for allocation for a similar uses to its current established use: mixed use development including residential (no figure is provided) and educational use within years 11-20/+ of Kingston's Local Plan.</p> <p>Supporting text for Policy KS3 of Kingston's Local Plan states at para 9.21 <i>The Local Plan will continue to support the refurbishment and intensification of educational facilities within the borough. This includes Kingston University's programme of modernisation and renewal at the Penrhyn Road, Kingston Hill and Knights Park campuses.</i></p> <p>While the quantum of development including number of homes for SA22 is yet to be established in Kingston's draft Local Plan, Kingston's Habitats Screening Assessment para 8.3.4 states that there could be potential for traffic generated from the site (and other nearby allocations) to pass along the A3 road adjacent to Wimbledon Common SAC. It also states at para 8.315 that as the Kingston University site is within 0.43miles of Wimbledon Common SAC, development could cause recreational pressure.</p> <p>Merton Council believes that this site in combination will not have a 'likely significant effect' on Wimbledon Common or other SACs for the reasons set out in</p>

Local authority	Housing	Transport	The authority HRA findings.	This HRA comment(s)
				paragraph 6.4 onwards at the bottom of this table.
Richmond Local Plan review: Consultation on the ' Publication ' Draft Local Plan (Regulation 19) 9 June to 24 July 2023. Submission and examination: Late summer 2023 to summer 2024	The borough's ten-year housing target is 4,110 homes.	None identified	Richmond Upon Thames: Regulation 19 Draft Local Plan Habitat Regulations Assessment Appropriate Assessment concluded: that the Richmond-Upon-Thames Local Plan will not result in adverse effects on the integrity of any European Sites.	Development identified in Richmond's Local Plan are unlikely to have any likely significant adverse effects on the European sites.

- 6.4. With reference to [Kingston Council's emerging Local Plan \(Regulation 18\) Habitats Regulations Screening Assessment](#) (see figure 6 above) Merton Council believes that Kingston's emerging Local Plan, including their proposed policy KS3 and proposed Site Allocation SA22 (Kingston University Kingston Hill Campus) will not have a 'likely significant effect' on European site within our catchment area when considered in combination with the provision of Merton's Local Plan.
- 6.5. Kingston's Reg 18 proposed site allocation SA22 is currently an established Kingston University campus including educational buildings, a café, restaurant and halls of residence. This is reflected in supporting text for Kingston emerging policy KS3 which refers to Kingston University's "*modernisation and renewal programme*" at three campuses, including Kingston Hill (site SA22). SA22 is proposed as a long-term allocation for a mix of uses including education and residential. Kingston Local Plan, however, does not contain any potential quantum for new homes or educational uses, or any details of how Policy KS3 (a)'s proposal "*to identify appropriate opportunities, including on their existing sites, to meet their [Kingston University's] needs for new and upgraded facilities*" would be delivered at proposed site SA22.
- 6.6. Kingston and Merton's Local Plans have housing targets derived from the London Plan 2021. [Figure 13.1 of Kingston's Reg 18 Local Plan](#) shows Kingston's indicative housing trajectory which runs from 2019-2031 and does not contain any housing or residential development attributed to site SA22, which is described as being delivered in +11/20 years, "*longer term*". At present, it is not possible to see how or whether SA22 contributes to Kingston meeting its share of London's housing needs.
- 6.7. Taking a precautionary approach, Merton's HRA has assumed that Kingston's proposed allocation SA22 is developed between 2031 and 2041 and includes some additional residential and educational development in line with its proposed allocation. However, even following a precautionary approach, it is not considered that, as currently drafted, policy KS3 or site allocation SA22 proposes the delivery of significant, genuinely additional, development compared to the established uses on site, and the direction of travel also includes modernisation and upgrade of existing campus facilities.

- 6.8. [Kingston's Interim Integrated Impact Assessment Report December 2022](#) (page 101) describes Kingston's proposed allocation SA22 location as relatively good in terms of public transport accessibility (PTAL 2-4) and adjacent the Borough Strategic Cycling and Walking Network. The student population is unlikely to be driving and are more likely to use sustainable transport for example the university bus which travels between the university campuses and Kingston town centre, as well as the number of public transport routes that serve the area. This chime with Kingston's emerging policy KS3 which states at B(2) that *New... buildings for education use should... (b) promote safe, active and sustainable travel through School Travel Plans, reduce car uses and the impact of school trips on local highway networks;*
- 6.9. SA22 is over 200 metres away from Wimbledon Common - 0.43km measured as straight line distance. However the shortest walking route between SA22 and Wimbledon Common SAC measures 1.6km, including crossing the busy A3 road. It is not considered reasonable for cats and other pets that may arise from any additional homes or halls of residence at SA22 to predate Wimbledon Common given the distance and the difficulty of successfully crossing the A3 road. Access from SA22 to Wimbledon Common is approximately 35 minutes by public transport and approximately 10 minutes drive, although the opportunities for private car parking in or near Wimbledon Common are very limited for non CPZ permit holders.
- 6.10. Kingston's emerging Local Plan contains a series of policies that *"prioritise the needs of pedestrians and cyclists as well as access to public transport, before car travel.*(KT2) and restrict private car parking for new developments, in common with the London Plan 2021. When considering Merton's Local Plan provisions in combination with Kingston's proposals it is considered reasonable that additional educational, mixed use or residential development of site SA22 or others site allocations (in Kingston and Merton) would not give rise to recreational pressures that would have a likely significant effect on Wimbledon Common SAC.
- 6.11. Kingston's HRA Screening cites air pollution as an identified pressure to the integrity of Wimbledon Common SAC and notes the levels of existing air pollution in relation to Wimbledon Common SAC, where known. Both Kingston Regulation 18 Local Plan and Merton's Reg19 Local Plan (including as proposed to be modified) contain policies that are in general conformity with the London Plan in seeking to improve air quality during both construction and for the lifetime of new developments.
- 6.12. Any development will need to have regard to the London Plan. It seeks to improve air quality in London namely policy SI1 *Improving air quality* which sets out clear criteria for development to meet a number of requirements to reduce air pollution such as: (part b)
To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:
 1) *Development proposals should not:* a) *lead to further deterioration of existing poor air quality*
 b) *create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
 c) *create unacceptable risk of high levels of exposure to poor air quality.*
- 6.13. Furthermore, development proposals must be at least Air Quality Neutral. (SI1 part 2a) *development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution.....*(SI1 part 2b).

- 6.14. Part e states that *Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site.*
- 6.15. Furthermore, where it can be *demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.*
- 6.16. The policy also sets what must be done to reduce the impact on air quality during the construction phase of development proposals and the need to demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.
- 6.17. Overall, the Mayor's air quality policies in the London Plan, the Mayor's Transport Strategy and the London Environment Strategy are expected to result in a considerable net improvement in air quality over the plan period (and beyond); even allowing for growth in population and jobs as set out in the London Plan. Importantly, both Kingston's and Merton's emerging Local Plans must be in general conformity with the London Plan and its associated documents/guidance. Furthermore, the HRA findings for the London Plan did not find likely significant effects on SACs.
- 6.18. Therefore it is considered that Kingston's draft Local Plan, including site SA22 and policy KS3 will not have likely significant effects on air pollution or other potential harm to Wimbledon Common SAC, in combination with other Local Plans including Merton's emerging Local Plan.

7 Proposed Main Modifications (MMs) summary

- 7.1. This section provides a summary of the proposed MMs. This report is focused on the MMs the council are making to the Plan relating to the Hearings (June and October), discussions and communications, between the council after the Hearings with the Inspectors for example the Post Hearing Letter(s).

Additional Modifications moved to Main Modification

- 7.2. The Inspectors letter recommended that a number of Additional Modification (AM) proposed by the council should be Main Modification (MM) due to the weight of the change and or edit. The council has excepted the recommendation. It should be noted the alterations do not change the direction of the Plan.

Plan period and housing delivery stepped approach

- 7.3. The council is proposing MM1.1 to change the plan's development period this is due to the length of time between key stages taking long. At submission stage the plan's period was 2021/22-2035/36. The proposal is for the Plan to cover 2021/22 - 2037/38. This is in keeping with the requirement of the NPPF.
- 7.4. NPPF paragraph 22 states that:
- Strategic policies should look ahead over a minimum 15 year period from adoption¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.....*
- 7.5. Paragraph 61 (NPPF) states:
- To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area.....*
- 7.6. The proposed MM throughout the Plan will improve accuracy, ensure 'Soundness' and complying with the NPPF (para 22) requirements, to produce a 15 year Plan. The proposed changes to the Housing Trajectory reflects this change and adds an additional 2 years for housing delivery period.
- 7.7. The council does not believe there are any 'likely significant effects' due to the Plan period changing as it is in keeping with the NPPF requirement to produce a development plan. However, what may have an effect is the proposed housing delivery stepped approach illustrated in the housing trajectory (Appendix A). It covers a 17 years 2 addition year and over the Plan period.
- 7.8. Merton's housing target is 9,180 homes for the ten-year period 2019/20 to 2028/29 or 918 homes per annum. This is based on a detailed analysis of land availability and capacity across London that Merton worked with the GLA and all other London boroughs. In recognition of the significant increase in housing delivery required by these targets, the London Plan states at paragraph 4.1.10, that these may be achieved gradually and encourages boroughs to set a realistic and where appropriate, stepped housing delivery target over a ten-year period.
- 7.9. London Plan paragraph 4.1.11 states that if a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 Strategic Housing Land Availability Assessment (SHLAA) findings which covers a period up to 2041. In addition, any local evidence of identified capacity, in consultation with the GLA and take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements and rolling forward the housing capacity assumptions applied in the London Plan for small sites.

- 7.10. The council is proposing taking a stepped approach to deliver housing covering 2021/22 – 2037/38 in line with London Plan requirements. This approach should deliver a minimum of 12,084 additional homes as set out below. Therefore, from 2029/30 to 2032/33 Merton is proposing a total housing target of 3,400 new homes, which is higher than the London Plan SHLAA requirement for 1,896 new homes.

Figure 7: Merton’s stepped housing delivery

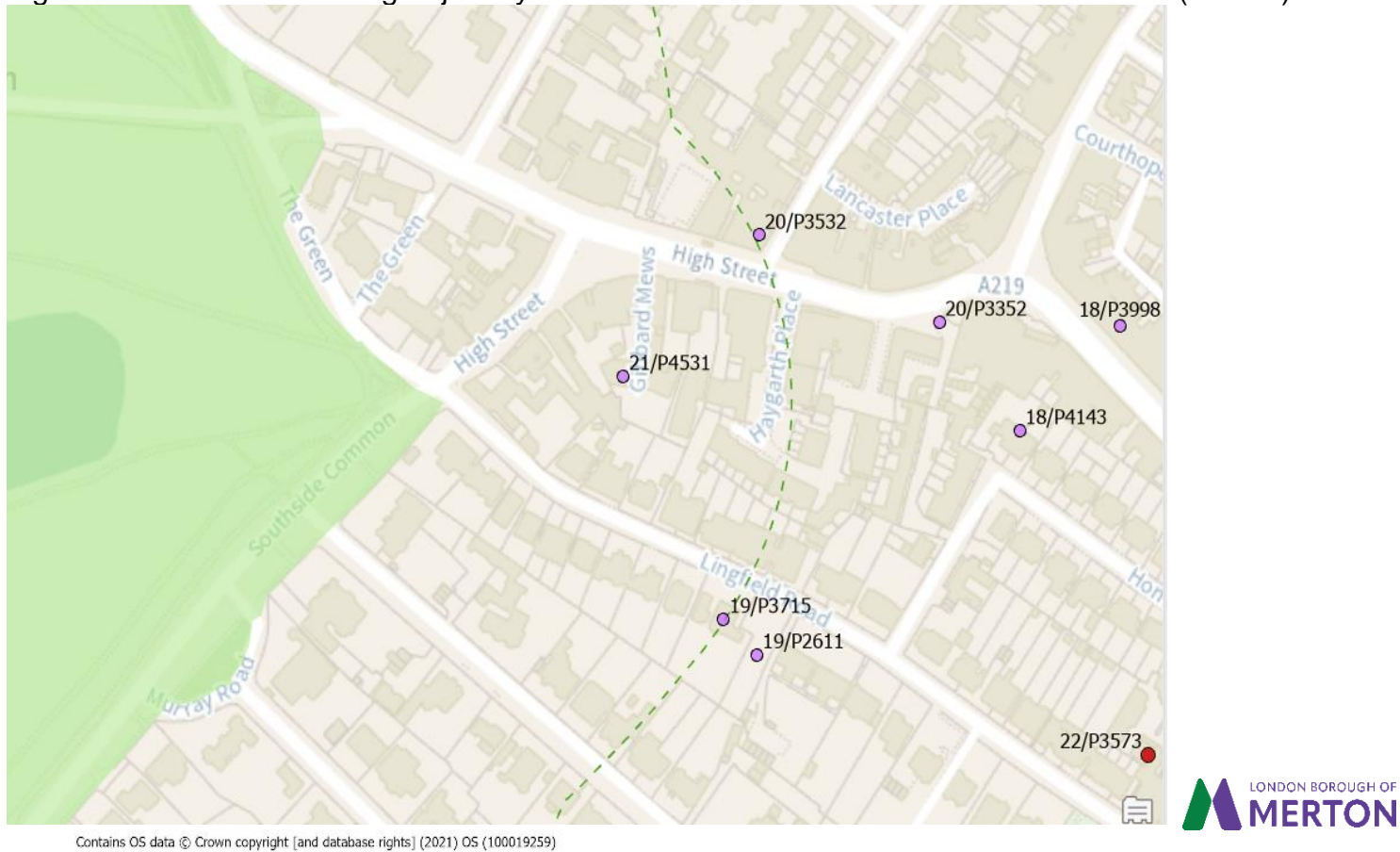
Year	Target
2021/22	918
2022/23	500
2023/24	450
2024/25	700
2025/26	720
2026/27	775
2027/28	775
2028/29	775
2029/30	1120
2030/31	1200
2031/32	780
2032/33	700
2033/34	474
2034/35	548
2035/36	548
2036/37	548
2037/38	548
Total	12,084

- 7.11. The aim is to deliver additional new homes by bringing forward housing capacity through Merton Opportunity Area (Morden, South Wimbledon, Wimbledon and Colliers Wood town centres), large scale regeneration project, enabling mixed use development within the town centres, bringing vacant properties back into use through Merton’s empty homes strategy and preparing masterplans, development briefs and design guidance for larger housing sites for example.
- 7.12. A reason for taking this action is due to changes in the expected delivery of some our large-scale development in the borough. For example, the demolition of 748 homes for the Estates Regeneration (three housing estates in Mitcham, Morden and South Wimbledon) before 2029 which means the council cannot deliver the required 9,180 new homes between 2019/20 and 2028/29. The Estate Regeneration is support by the Estate Local Plan which was subject to a HRA and other environmental assessments.

- 7.13. It found no 'likely significant effect' on the European sites. The regeneration of all three estates will result in an uplift of over 2,000 new homes. Other large sites identified in Merton's housing trajectory are expected to be delivered later than was once assumed during the SHLAA consultation in 2017.
- 7.14. Merton's Opportunity Area (designated in the London Plan) is set to deliver 5000 new homes and 6000 jobs (indicative figure up to 2041). An Opportunity Area Planning Framework (OAPFs) will be produced in accordance with London Plan policy *SD1 Opportunity Areas*. It will be subject to a number of impact assessments including HRA, Sustainability Appraisal and other environmental assessment for example Air Quality Assessment.
- 7.15. The HRA for the London Plan found (in regard to the OA designations) that overall, *the Mayor's air quality policies, other London Plan policies, the Mayor's Transport Strategy and the London Environment Strategy is expected to result in a considerable net improvement in air quality in Londonconsiderably over the plan period (London Plan) and beyond, even allowing for growth in population and jobs over the same time period and beyond national initiatives. It also concluded that development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral. Furthermore, the London Plan HRA found that policy SD1 Opportunity Areas had no 'Likely Significant Effect'.*
- 7.16. It continued to state *for the most part the opportunity areas are relatively remote from European sites and the overall focus on the role of the London Plan (and the Mayor's agencies) in these opportunity areas is on improvement/delivery of sustainable public transport, which will be positive for air quality.*
- 7.17. *Effect of the proposed MMs (plan period and housing delivery stepped approach) on the European Sites:* the council does not believe that the stepped approach for delivering much needed new homes will have 'a likely significant effect' to the European sites, either alone or in combination with other neighbouring boroughs. The plan period is in keeping with national and regional planning policies regarding producing a local development plan.
- 7.18. The housing delivery stepped approach as mentioned above is reliant on large sites already identified in the SHLAA for the later years. An example is the Estates regeneration sites supported by the [Estates Local Plan](#) where a HRA for the plan, found no 'likely significant effect'.
- 7.19. The other large sites have been allocated in the draft Local Plan and are assessed as part of the HRA process for the draft Local Plan. Any submitted planning application for any site would be subject to planning policies (national, regional and local) and if required an Environmental Impact Assessment (EIA) as part of the planning application process, for larger sites.
- 7.20. All sites are required to have regard to the London Plan and its associated document for example London Plan Guidance (LPG) – these cover a range of area from environment, social and economic. Providing further details of London Plan policies and technique advise. More importantly, the sites in question are over two hundred metres away from the Common with the exception of a

development in Gibbard Mew (see figure 8) which is a small development (less than 9 units) and as such are unlikely to have a significant effect on the Common.

Figure 8: Sites in the housing trajectory within 200 metres of Wimbledon Common SAC (Merton).



- 7.21. The closest site in a neighbouring borough is site SA22 (Kingston University campus). SA22 is 1.6km walking distance from Wimbledon Common SAC (0.43km straight line distance) and could be argued is a less attractive destination compared to Richmond Park, which is a mere 0.5km walk away from SA22. Please refer to section 6.

Housing development policies

- 7.22. A modification is proposed to update the minimum housing target requirement set out in strategic policy H11.2 and move the stepped housing trajectory from supporting text, into Strategic Policy H11.2 (*Housing Provision*) to ensure the Plan is effective. MMs are proposed to update the housing trajectory to:
- Reflect the latest position on the housing supply pipeline projected over the Plan period.
 - Reflect the latest position on the delivery status of a number of large sites and also the phasing programme for the estates regeneration of Eastfields, High Path and Ravensbury estates.
 - Provide an updated stepped housing target for Merton.
- 7.23. A MM is proposed to supporting text (para. 11.1.22) to improve the clarity and effectiveness of the Plan concerning the securing of affordable housing monetary contributions from sites proposing 2- 9 new homes. In addition, the council is also proposing a MM to policy H11.6 and its supporting text to address government's new policy direction (December 2023) on Planning Policy for Traveller Sites.

Viability

- 7.24. A MM is proposed to strategic policy IN14.1 (*Infrastructure*) to include requirements that comply with the approach to viability testing, decision making and infrastructure prioritisation as set out in the London Plan policy DF1 (*Delivery of the plan and planning obligations*). MMs are proposed, to include cross references where relevant to strategic policy IN14.1 in other chapters of the Plan e.g. chapter 2 (*Climate Change*) and chapter 11 (*Housing Provision*).

Monitoring framework (local plan)

- 7.25. The council is proposing a new policy named Monitoring Framework (chapter 17) the purpose of this policy is to monitor the performance of the Plan and its effectiveness. It also allows the council, to understand whether policies have worked as they were intended. The monitoring period will be implemented from the first year of adoption. The Monitoring Framework table identifies the monitoring indicators which will monitor the effectiveness and performance of the Local Plan and sets out triggers for action and the action the council will take for example a full or partial review of the Plan. The implementation of the Plan's policies will be reported in Merton's Authority Monitoring Report (AMR).

Tall buildings clusters and their environments development policies

- 7.26. MMs are proposed to include strategic height diagrams for the Morden Regeneration Zone and Wimbledon town centre, to ensure general conformity with the London Plan. In addition, the term 'taller buildings' has been replaced with 'tall buildings' to provide a clear and consistent terminology throughout the Plan and to better reflect the language of the London Plan Policy D9 Tall buildings.

- 7.27. Other proposed MMs changed references to maximum heights in favour of ‘appropriate’ heights and require the submission of local design guides or design codes to allow for appropriate stepping up of storey heights in the environs of both the boundaries of the areas where tall buildings are considered suitable and adjacent to identified clusters, to avoid abrupt transitions. These changes relate to policy D12.6 and the neighbourhood policies and site allocations throughout the Plan.

Green infrastructure development policies and designations

- 7.28. There are proposed MMs for several site allocations, all to provide clarity in the text or update the site allocation maps to show further features such as MOL designations and other green infrastructure adjacent to a site, for example, sites W5, Mo3 and Wi3. These changes do not affect the findings of the submitted SA (July 2021 and November 2021).
- 7.29. All proposed minor changes to the MOL around the All England Lawn Tennis Club have now been withdrawn and some minor changes, removing an approximately 200sqm area, are proposed to the SINC and Green Corridor designations within Morden Park, to ensure that the boundaries accurately align with approved and implemented landscaping details and the location of an electrical substation.
- 7.30. MMs are proposed to policy O15.4, which, where appropriate, use the phrase ‘trees, hedges and other landscape features’ instead of merely ‘trees’, thereby improving clarity that other landscape features of amenity and biodiversity value will also be protected, and clarity is also improved with the removal of unnecessary duplicated requirements and matters that are addressed in TPO regulations.

Morden regeneration zone development policy

- 7.31. There are proposed MMs that improve clarity through the provision of a definition and the consistent use of the term ‘*comprehensive regeneration*’ and another that also improves clarity, flexibility and deliverability by allowing incremental development proposals on large sites (0.25ha and above) that contribute to the delivery of comprehensive regeneration. The MMs do not affect the total number of units resulting from comprehensive regeneration within the Morden Regeneration Zone (circa 2000 units), which has not changed since the submission SA/SEA.

Climate change development policies

- 7.32. Following the adoption of Building Regulation Part L 2021 on 15th June 2022, as part of a consortium of 18 London boroughs Merton commissioned a consultant to review the 2D12 *Towards Net Zero Carbon* study (2019) in light of changes to Part L. Government released the modelling behind the new Building Regulations in December 2022 which was required for the review.
- 7.33. The results of this review were published in the [Delivering Net Zero](#) study in May 2023. As this study has been published at a later stage during the Local Plan examination, Main Modifications to the council’s climate policies are recommended in line with evidence presented in Submitted Document 2D12 *Towards Net Zero Carbon* study (2019), general conformity with the London Plan 2021, the update to Building Regulations Part L and the equivalence in targets set based on 2013 to 2021 Building Regulations.

- 7.34. The examination process evidence has led to the following changes to the climate change policies and supporting text:
- The minimum onsite carbon reduction targets in policy CC2.2 (c) and supporting text have been updated in light of changes to Part L and reflecting general conformity with the London Plan and the Mayor’s Energy Assessment Guidance.
 - The Mayor’s “Be Lean” requirements in policy CC2.3 (c) and the relevant supporting text have been removed because the updated evidence demonstrated that these targets were challenging to achieve against Part L 2021.
 - Policy CC2.3 (e) has been removed and the latest Energy Use Intensity figures as per the 2023 study are expressed in the supporting text to assist developers in how they might demonstrate that they have made the fullest contribution to minimising energy use.
- 7.35. The MMs across the climate change chapter seek to ensure the supporting text remains in general conformity with the London Plan 2021 and has regard to the GLA’s Energy Assessment Guidance, reflecting the change in Part L Building Regulations published in 2022. Modifications have also been proposed within the climate change chapter where these other policies have changed (e.g. Merton’s housing targets in policy H11.2 and to the infrastructure prioritisation included in policy (IN14.1); these changes are discussed in the relevant sub heading in this section.

Site allocations

- 7.36. The council is proposing modification to a few site allocations. These are triggered by changes elsewhere in the Plan, for example, modifications to policy D12.6 building heights; this in turn has led to MMs for some site allocations. Other MMs have been made to provide clarity and improve readability with the aim to set out clearly the council’s expectation for each site, its role for delivering housing (where applicable) and its contribution to growth. A significant site allocation change is Wi3 the council is proposing reducing the size of the site but not its proposed use – sporting recreation and associated uses.
- 7.37. The Post Hearing Letters (INSP22, INSP23) the Inspectors stated that: *As drafted, the site allocation for Wi3 sits uneasily with either the legislative definition of allocations given in the 2012 Regulations, or that of the Plan itself in these terms, and reads as a set of more generalised aspirations relating to the site and its surroundings, which result in an ambiguous and thus ineffective policy position.* They further noted:
-that the proposed MMs and the policies in the Plan ensure that the site allocation does not have a likely significant effect on Wimbledon Common SAC. Furthermore, On the other side, the land within AELTC’s ownership is a golf course, and only part of the wider Wimbledon Park, a designated heritage asset which is in a number of ownerships, straddles Merton’s boundary with the London Borough of Wandsworth and includes a range of different uses. Furthermore, when this is considered against the background of the diversity of character found on either side of Church Road, we consider that the allocation is unclear, and ambiguous and it would not be evident how a decision maker should react to development proposals relating to the site as a whole – the allocation is thus at odds with the Framework (at paragraph 16 (d)) in these terms.*

- 7.38. The submission HRA assessment for site Wi3 found that the allocation *positively steer development away from European Sites and associated areas*. In light of the recent Inspectors comments and the NPPF, the council is proposing removing Wimbledon Park from site allocation Wi3.
- 7.39. In January 2019, the council consulted with Natural England on the HRA Scoping Report, their response on the report was as follows:
'Natural England does not consider that this SEA/SA scoping report and Habitat Regulation Assessment poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation'.
- 7.40. Again, in September 2021, the council consulted with Natural England on the Plan (including site allocations) and its supporting documents namely the HRA their response was as follows:
'Natural England has no comments to make on this consultation'
- 7.41. At no point did Natural England raise any concerns on the findings of the HRAs (at the time Wi3 included Wimbledon Park). Furthermore, the council has engaged and worked closely with Natural England and Historic England on all aspect of the Plan especially on matter pertaining to natural environment and historic assets.
- 7.42. In assessing Wi3, the HRA has regard to the Wealden judgement and the revised Natural England method regarding combination air pollution and how the effects are to be 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 (DfT), 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.
- 7.43. Car ownership and demand for travel within the borough and between neighbouring boroughs has remained broadly static, with the latest DfT monitoring data suggesting a fall in Merton traffic levels over the past 15 years (before COVID-19). The development of this site will mean a possible increase in traffic this is mainly construction traffic namely lorries to and from the site moving materials during construction along the Parkside (A219) off the A3, all of which could have an impact on air quality in the area.
- 7.44. Lorries in the UK are required by law to be Euro VI compliant. The Euro VI standards were originally set out in Regulation 595/2009 and its implementing Regulation 582/2011, with further amendments contained in Regulation 133/2014. Euro VI are standards reduce harmful pollutants from vehicle exhausts, including:
- Nitrogen oxide (NOx).
 - Carbon monoxide (CO).
 - Hydrocarbons (HC).
 - Particulate matter (PM).

- 7.45. The Euro VI emissions standard gained increased potency in 2019 as it consolidated the criteria under which new ultra-low emission zones (ULEZ) and clean air zones (CAZ) are currently enforced.
- 7.46. Noise pollution during construction could be increased however, in accordance with planning policies (national and regional) and current legislation any submitted planning application would need to be supported by a Construction Logistic Plan (CLP) which must set out what measures would be taken in regard to:
- Environmental impacts: reduce and mitigate any adverse impacts and lower vehicle emissions and noise levels.
 - Road risk: Improving the safety of road users.
 - Congestion: reduced vehicle trips, particularly in peak periods.
- 7.47. The CLP focuses specifically on construction supply chains and how their impact on the road network can be reduced. The construction supply chain covers all movements of goods, waste and servicing activity to and from site. A CLP differs from a Construction Management Plan (CMP) or Construction and Environmental Management Plan (CEMP) in that CLPs are developed earlier in the planning process and focus, specifically on logistics. The information and planned measures identified in the CLP can also be included in the CMP or CEMP.
- 7.48. Construction of Wi3 (and any other site) can potentially generate dust emissions. However, current standards and proven construction methodologies available to minimise dust effects as set out in the [Institute of Air Quality Management guidance 'Assessment of dust from demolition and construction 2014'](#) ensuring the impact are manage, reduced and minimised. As well as the guidance, any development proposal must have regard to the Greater London Authority (GLA) [Control of Dust and Emissions Supplementary Planning Guidance \(SPG\)](#). The aim of the SPG is to reduce emissions of dust, PM₁₀ and PM_{2.5} from construction and demolition activities in London a part of any development proposal.
- 7.49. At present the spectators to Wimbledon Tennis tournament is up to 40,000 people per day. With the site expected to be delivered circa 2030s, it is estimated the development of Wi3; visitor numbers would increase to 50,000 per day approximately during the Championship. Most visitors travelling to the Championship main site (Church Road) largely tend arrive by a combination of sustainable travel modes, namely public transport (including the special bus service) and walking, this is expected to be the case with the delivery of Wi3. Also, there are a number of underground stations serving the area. Southfields (the nearest) on the District Line, Wimbledon Station (District Line, tram and railway) and on the eastern side of Wimbledon Park is Wimbledon Park underground station (District Line).
- 7.50. An increase in traffic and movement to and from the site is also possible. However, this is likely to be for a short period 1-3 weeks before and during the Wimbledon Championship (currently 2 weeks). As with, the current tournament Wi3 would be subject to traffic and parking restrictions, parking suspension and importantly counter terrorism measures in accordance with Counter Terrorism Security Office (NaCTSO), including National Vehicle Threat Mitigation Unit.

- 7.51. Other traffic measures include (based on current practise – these are subject to change informed by NaCTSO and National Vehicle Threat Mitigation Unit):
- The used during the tournament is extension Control Parking Zones (CPZs) the surrounding areas are subject to CPZs.
 - Extended CPZs to 11.30pm and is strictly enforced by the council.
 - Road closures including Church Road and Somerset Road and a number of roads near Wimbledon Common are closed to prevent parking by visitors.
- 7.52. Any action taken by the council is part of Traffic Management under the Road Traffic Regulation Act 1984 (S.16A of the 1984 Act). The Traffic Management orders enforced in 2023 during the Championships can be viewed on the council's [website](#) as a guide (subject to change each year).
- 7.53. The site allocation itself does not provide an increase in on-site parking for year round visitors to the area, which is limited to on-street parking were allowed. Therefore, the development of the site it is not encouraging vehicle use or an increase of it. The site allocation won't facilitate significant numbers of additional visitors by vehicle and those visiting year round would not be affected by road diversions that required them to use the A219 Parkside, it is not considered that additional visitors to the site year-round, would have a significant effect on the protected habitats site of Wimbledon Common.
- 7.54. It must be acknowledged that any development may have an impact on air quality and the environment. However, it is not believed the development of Wi3 (alone or in combination) would result in a 'likely significant impact' on the Wimbledon Common including the SAC due to its location more than 200m away from the common.
- 7.55. The council believes that current legislation and policies lessen any potential air quality impacts for example, the Euro VI compliant law (Regulation 595/2009, Regulation 582/2011 and Regulation 133/2014).
- 7.56. Any submitted development proposal for the site would be subject to a number of assessments to support any planning application (on environmental and air quality matters, construction plan, heritage and design and traffic management).
- 7.57. As in earlier HRAs, it is recommended the developer consults and engage with Natural England at the earliest stage of the design and layout process to inform any submitted planning application and if, there are any alterations to the submitted application.
- New policy Wimbledon Park development policy – N8.1*
- 7.58. The council is proposing a new policy for Wimbledon Park following discussions that took place during the Hearings and with regard to the 2012 Town and Country Planning (Local Plan) (England) Regulations and NPPF paragraph 196. The policy covers the majority, but not all, of the designated Wimbledon Park Grade II* Registered Park and Garden within the London Borough of Merton geographic boundary. As this is a new policy it has not been assessed as part of the HRA process before and will be 'screened in'.

- 7.59. The policy aims to provide for the conservation, enhancement and ongoing management of the registered park and garden, whilst also ensuring that clear support is given for continued long-term investment in AELTC's facilities to maintain its global position as a world class sporting venue of national and international importance. The policy aims to conserve and enhance the historic park and lake, provides opportunities to remove the park from Historic England's Heritage At Risk register, reflects the biodiversity, sporting and recreation activities across all landholdings.

8 'Screened in' MMs

- 8.1. This section looks at the proposed MM which have been 'screened in' (see Appendix A) to assess the effects on the integrity of European sites. These include:

- Policy N8.1 Wimbledon Park (new policy).

Wimbledon Park N8.1 (new policy)

- 8.2. The council is proposing a new policy N8.1 following the Inspectors comments and in consideration of NPPF paragraph 199 requirements. This new policy has been 'screened in' as it has not been subject to HRA before. The council believes a standalone policy will provide for the conservation, enhancement and ongoing management of the registered park and garden, whilst ensuring that clear support is given for continued long-term investment in All England Lawn Tennis and Croquet (ALTEC) facilities to maintain its global position as a world class sporting venue of national and international significance.
- 8.3. The policy seeks also to provide for sport, recreation, play and amenity uses within the park. Wimbledon Park currently supports a wide range of sports and recreational uses across its three land ownerships including angling, watersports, field and track, bowls, hockey, cricket, tennis and beach volleyball. It also provides open space for informal sports and recreation, particularly on the Great Field in the public park, walking around the park and parts of the lakeshore, the recently deculverted brook and in the children's playgrounds and splash play.
- 8.4. The majority of the Grade II* Registered Park is in private ownership and is not publicly accessible. The public park at Wimbledon Park is 27 hectares, 9 hectares of which comprise the lake. It lies in the north of the borough. There are entrances for vehicles and pedestrians on Revelstoke Road in the east and Wimbledon Park Road in the northwest. There is also a pedestrian entrance on Home Park Road to the east.
- 8.5. Effect of the site allocation on the European Sites: The public park is intensively used for sports and recreation and this policy seeks to maintain this, while improve public access to private land ownership where possible. This policy supports the provision of well-maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support access to and enjoyment of more of the park for people of all ages and abilities.

8.6. The policy does not provide for any housing. The policy is in accordance with the NPPF 98 which states:

Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

8.7. The potential effects of the proposed new policy for Wimbledon Park has been considered in combination with other policies and site allocations in Merton's Local Plan and in combination with other Local Plans. Section 6 sets this out in detail, and figure 6 outlines the "in combination" assessment with other Local Plans. Given the contents of Kingston Reg 18 Local Plan HRA Screening (December 2022), paragraphs 6.4-6.16 go into detail about the specific potential effects that have been considered arising from Kingston's Reg18 Local Plan, including the housing target, the longer-term allocation of Site SA22 and policies including KS3 which supports "*new and upgraded facilities*" at all three Kingston University campuses including SA22.

8.8. When considering the "in combination" effects, the new Wimbledon Park policy is not considered to have a "likely significant effect" on Wimbledon Common or other SACs for the reasons set out below.

- 1) The new Wimbledon Park policy does not propose any new homes; therefore there will be no predation from pets or additional recreational pressures arising from policy N8.1.
- 2) The closest part of Wimbledon Park Policy N8.1 (currently not publicly accessible) to Wimbledon Common is 0.8km away / approximately 10 mins walk. It is considered that there won't be "likely significant effects" from the Wimbledon Park policy N8.1 on additional recreational pressures arising from increased visitor numbers.
- 3) The new policy N8.1 supports investment in sports and recreation within Wimbledon Park. It is reasonable to conclude that implementation of policy N8.1 will be more likely to increase visitor travel to and dwell time within Wimbledon Park rather than policy N8.1 increasing visitors coming to Wimbledon Park as a result of the policy implementations with the direct intention of then travelling onwards to Wimbledon Common. Both Wimbledon Park and Wimbledon Common are part of the Capital Ring orbital walking route which circles London but it is not considered that Policy N8.1 Wimbledon Park will have any effect on the numbers of people using this pan-London walking route to travel away from Wimbledon Park.
- 4) Access to Wimbledon Park is available via a variety of modes: walking, cycling, taking public transport and driving by private car. The policies in Merton's emerging Local Plan, those of neighbouring boroughs and the London Plan promote active travel and public transport over travel by private car. Wimbledon Park is accessible by walking or cycling from nearby Southfields or Wimbledon Park underground stations or from Wimbledon rail / underground / tram station. There are a limited number of parking spaces within parts of the park and the policy does not propose substantial increase in parking provision.

8.9. While investment as per policy N8.1 will increase the number of visitors to Wimbledon Park, it is considered that there will be no likely significant effects from visitors travelling to Wimbledon Park on Wimbledon Common SAC as planning policies facilitate travel by sustainable modes and not by private car. In addition, increasing more sustainable travel for example electric vehicles and supporting infrastructure will assist in reducing air pollution effects.

Consideration of Wimbledon Park policy and site SA22 (Kingston) - construction traffic and air pollution

8.10. Proposed site allocation SA22 is for long-term development (described as +11-20 years, beyond 2021) for a mix of uses including education and residential. As mentioned section 6, at the time of writing no information is contained in Kingston's Local Plan on the quantum of development for SA22. Policy KS3 (Kingston) proposes new and upgraded facilities for SA22 and other Kingston University campuses.

8.11. Taking a precautionary approach it is reasonable to assume there will be at least some new educational and residential development at SA22 in the long term in addition to upgrades of existing facilities. In the case of both Kingston's SA22 / policy KS3 and Merton's N8.1 Wimbledon Park, landscaping, upgrading existing facilities and any new development will require a level of construction traffic.

8.12. Construction traffic can access Wimbledon Park via a variety of routes and only construction traffic which accesses Wimbledon Park via the A219 will be within 200m of the Wimbledon Common SAC. Similarly construction traffic can access site SA22 (Kingston site) via the A308 which passes close to Richmond Park SAC avoiding any close proximity to Wimbledon Common SAC.

8.13. Wimbledon Park policy N8.1 clearly sets what developers must do to reduce the impact on air quality during the construction phase of development proposals. Importantly the need to demonstrate how development proposals will comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance. Both the London Plan and Merton's emerging Local Plan seek to address the potential for air pollution during construction at all stages.

8.14. Kingston's emerging policy KC2 requires major developments to achieve Air Quality Positive Approach, which exceeds the London Plan standards. Kingston's draft policy KT5 *Sustainable Servicing* requires developments to co-ordinate and manage deliveries including construction traffic to minimise their impact on the highway, their need for journeys and their emissions.

8.15. Both boroughs have declared their entire geography boundaries as Air Quality Management Area and are supported by their individual Air Quality Action Plan (AQAP) as part of our duty to London Local Air Quality Management. The AQAPs set out the actions each council will take to improve air quality from monitoring, health and wellbeing considerations, improving walking and cycling infrastructure, reducing pollution in and around schools and enforcing the Non-Road Mobile Machinery (NRMM) Low Emission Zone

8.16. Considering the above and each council's objectives and aims to reduce air quality, increase more sustainable travel and to protect and enhance the environment, the council is of the belief that policy N8.1 Wimbledon Park will not have a 'likely significant effect' on Wimbledon Common SAC when considered in combination with other proposals in Merton's Local Plan or with Local Plans in

neighbouring boroughs plans. In accordance with the NPPF para 27. Merton Council will continue to co-operate on cross boundary issues and other relevant matters including housing, green infrastructure and environment protection; this includes development proposals near the designated SACs.

- 8.17. This HRA again recommends planning applicants of all but minor schemes consult and engage with Natural England at the earliest stage of the planning application process and before submission of any application and if there are any alterations to the submitted application.

9 Categorisation of the potential effect of the policies on the European Sites

- 9.1. As required under Regulation 102 of the Conservation of Habitats and Species Regulations - an assessment of the 'likely significant effects' of the Plan will be undertaken. A 'traffic light' approach will record the likely impacts of the policies and site allocations on European sites and their qualifying habitats and species. Using the colour categories shown below and the categorisation of the potential effect of the policies on the European Sites matrix found in figure 9.

Red	There are likely to be significant effects (Appropriate Assessment required).
Amber	There may be significant effects, but this is currently uncertain (Appropriate Assessment required).
Green	There are unlikely to be significant effects (Appropriate Assessment not required).

Figure 9: Categorisation of the potential effect of the policies on the European Sites.

Category A: No negative effect	
A1	Policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
A2	Policies intended to protect the natural environment, including biodiversity.
A3	Policies intended to conserve or enhance the natural, built, or historic environment, where enhancement measures will not be likely to have any negative effect on a European Sites.
A4	Policies that positively steer development away from European Sites and associated sensitive areas.
A5	Policies that would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
Category B: No significant effect	
B	Effects are trivial or 'de minimis,' even if combined with other effects.
Category C: Likely significant effect alone	

C1	The option, policy or proposal could directly affect a European Sites because it provides for, or steers, a quantity or type of development onto a European Site, or adjacent to it.
C2	The option, policy or proposal could indirectly affect a European Site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically, or physically connected to it or it may increase disturbance as a result of increased recreational pressures.
C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European Site.

Figure 10: Potential effect of 'the screened in' policies on the European Sites.

Policy Title	Effects if policy is implemented	European site(s) potentially affected	Categorisation of the potential effect of the policies on the European Sites	Comment
Wimbledon Park (New policy) MM 112.			A3	Policies intended to conserve or enhance the natural, built, or historic environment, where enhancement measures will not be likely to have any negative effect on a European Sites.

Appendices

Appendix A: Screening of proposed MMs

- a. The page and paragraph numbers are those in the [Stage 3 pre-submission draft Local Plan consulted on 22 July to 6 September \(Ref. 0D1\)](#). An absent Mod Ref. number in a sequence of numbers represents a former modification that is no longer proposed. **Bold text** indicates the proposed MM. ~~Strikeout~~ shows proposed text to be removed.
- b. The modifications are being proposed to:
- Improve clarity and consistency in the interests of clarity and
 - To ensure that the plan is sound, justified and effective
 - In the interests of clarity and to ensure consistent use of terminology.
 - To secure general conformity with the London Plan/NPPF and in the interests of effectiveness.

Figure A1: HRA screening of the Main Modifications LBM29

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM1	2, 327, 311, 341, 344, 374, 378, 380, 530, 541, 544, 547, 548, 550, 551	1.1.5 -1.1.6	<p>The Local Plan sets out the council's statutory planning policy framework for the borough. This plan sets out the level of growth, which needs to be planned for in Merton and identifies where that growth should will be located and how it should will be delivered. The policies set out in the plan will be used to determine planning applications in the borough. The Local Plan must be read as a whole document. The placement of the topic chapters and the policy within the chapters is no reflection on their importance or weight – it does not stand for a hierarchy.</p> <p>The Local Plan covers a range of matters, including, the number of the homes (including affordable) and employment provision needed and where they should will be, located. It also sets out policies for the protection and enhancement of the natural and historic environment, the provision of supporting infrastructure for growth and other policies to manage change in local areas including town centres, industrial areas neighbourhoods and the borough generally.</p>	In the interests of clarity and to ensure that the plan is sound. The change ensures that consistent terminology is used throughout the Plan.	No change to HRA findings. No ' <i>likely significant effects</i> '
MM2	7	Under 'Good Growth', 2 nd , 3 rd	Dealing with such a level of growth is undoubtedly a huge challenge, putting pressure on land, housing, infrastructure and the	In the interests of clarity and to ensure	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
		and 4 th paragraphs	<p>environment. It also comes as we are facing other unprecedented challenges: Brexit, Coronavirus (COVID-19), its impact and the following recovery, air pollution, climate change and entrenched inequality.</p> <p>The local plan seeks to ensure that Merton's future growth must be is planned in a sustainable way in accordance with the London Plan Good Growth principles. This includes maintaining a good balance between economic, social and environmental objectives, e-Creating liveable attractive and safe places for people to live, study, work and visit, as well as d Delivering our ambition of becoming a net-zero carbon borough by 2050, and creating resilient and adaptive environments, in response to the Climate Emergency for the benefit of all in Merton.</p> <p>Future growth also means planning for Ensuring we plan and supporting predicted population growth, increase demands for affordable homes, the impacts of the Covid-19 pandemic — its impact on people especially in deprived areas and the COVID pandemic recovery and the need to enable job creation. Delivering development, which meets the current needs of the present without compromising the ability of future generations to meet their own needs.</p>	consistent use of terminology.	No 'likely significant effects'
MM3	11	1.2.26	Design must consider safety and security, layout and orientation, public realm, social inclusion and environmental health impacts such as noise and air quality to ensure we are creating healthy neighbourhoods, which are accessible for all. The potential harmful effects to human health such as loss of daylight and sunlight, loss of privacy, loss of outlook, overcrowding, isolation, exposure to odours, noise and vibration and appropriate ventilation must be considered in design.	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM4	13	1.2.35	Ensuring we have the infrastructure and services to meet the needs of our growing and aging population is important such as transport, utilities, broadband, education and health. Delivering growth means ensuring we have the right infrastructure to meet	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			our needs for now and in the future. Careful planning together with our partners and stakeholders will make is key to ensuring Merton is more efficient and more resilient and preparing prepared it for the future needs and demands.		
MM5	14, 32, 37, 333, 346, 347, 348, 349, 373	1 st sentence below sub heading: Identifying Merton's Growth areas.	A considerable proportion of Merton's growth up to 2037/38 and beyond is expected to be delivered in the Opportunity Area (OA). The OA is designated in the London Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton's OA.	To ensure consistency with the National Planning Policy Framework (NPPF) in terms of the coverage of strategic policies.	Screened out No change to HRA findings. Findings - no ' <i>likely significant effects</i> ' <i>Please refer to section 7.</i>
MM6	14,121, 202, 383	3 rd para under 'Density and mixed uses'	In accordance with the London Plan 2021, tall Taller buildings are one form of high-density development that can be appropriate right in some the locations identified in this plan , subject to exemplary excellent design, good public transport accessibility and impact on existing character, heritage and townscape. ...	To ensure that the plan is clear and effective.	No change to HRA findings. No ' <i>likely significant effects</i> '
MM7	17-18	2 nd and 3 rd paragraphs under Opportunity Area (OA)	To ensure that the OA fully realise its growth and regeneration potential the council will work with the GLA to produce an Opportunity Area Planning Frameworks (OAPFs) in accordance with London Plan policy SD1 Opportunity Areas, subject to GLA priorities and resources. This plan-led approach, outlining delivery of affordable housing, create mixed and inclusive communities and ensure the OA will contribute to regeneration objectives to tackle spatial inequalities and environmental, economic and social barriers that affect the lives of all. The OAPF will would be prepared in a collaborative way with Merton's diverse communities (including children and young people, Black, Asian and other ethnic minority groups, businesses	To secure general conformity with the London Plan and in the interests of effectiveness.	No change to HRA findings. No ' <i>likely significant effects</i> '

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			and stakeholders). The key priorities for an OA, as outlined in the London Plan, are to:		
MM8	18, 21, 22, 23, 24, 96, 120, 129, 141, 143, 149, 154, 157, 193, 195, 199, 207, 208, 212, 226, 290, 293, 314, D12.7b. v, 12.7.3, 422, 430, 13.1.8, 13.1.11 , 13.1.19 , 438, 469a, 469c,	2 nd bullet point under Wimbledon	Support the highest quality development that preserves local amenity, enhances and conserves Wimbledon's rich heritage assets, character and appearance of place (AM14).	To ensure that the Plan is clear and effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
	14.2.9, 14.2.10, 532, 15.8.16, 546m, 546 qii, 548, 15.10.24, 649, 655				
MM9	32	Spatial vision	<p>3.1 By 20376-38 Merton will <u>have</u>:</p> <ul style="list-style-type: none"> • Be on our way Made progress towards becoming net-zero carbon by 2050 in partnership with other organisations and importantly with our residents. • Continued to grow the borough's low carbon and circular economy. • Have minimised greenhouse gas emissions and ensured resilience overheating, flooding and other the impacts of climate change. • <u>Improved community health and wellbeing and</u> reduced health and income inequality within the borough and the disparities between the east and west of the borough 	In the interests of clarity	<p>Screened out</p> <p>Findings - no change to HRA findings. No <i>'likely significant effects'</i></p> <p><i>Please refer to section 7.</i></p>
MM10	32	Spatial vision, new bullet point.	<ul style="list-style-type: none"> • <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> 	For compliance with national policy and to reflect the environmental Strategic Objectives set out on page 29, in the interests of the Plan's effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM11	35, 84, 431, 443, 456, 465, 471, 490,	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 ensure consistency with national policy.	No change to HRA findings. No 'likely significant effects'
MM12	37	2.1.11	<p>Current housing projections for Merton indicate that a minimum of 12,084 additional homes will be built during the plan period around 29,000 new dwellings could be built in Merton between 2021 and 2050. Policy must therefore ensure that new development in Merton does not create a legacy of poor performance that will require remedial action in the future and add to Merton's retrofit burden. In their Climate Emergency Design Guide (2020), the London Energy Transformation Initiative (LETI) concluded that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025.</p> <p>Footnote 2 - Refer to Policy H11.2. Based on sites identified to be delivered during the 15 year plan period and an assumed delivery of the Intend to Publish London Plan 2021 target for Merton of 918 new dwellings per year for the remaining 15 years to 2050. See Housing policies for further details.</p>	To ensure that the Plan is positively prepared and effective, and to secure consistency with national policy insofar as the coverage of strategic policies is concerned.	No change to HRA findings. No 'likely significant effects'
MM13	37 38	2.1.14 2.1.15	<p>3.2 There is a significant gap between current building standards (Part L 20212013) and the standards required to become net-zero carbon by 2050 [1251]. In order to achieve a net-zero carbon balance across the UK housing stock, LETI found that all new development will need to be designed to achieve an Energy Use Intensity (EUI), i.e. energy use measured at the meter, of 35kWh/m2/yr [9]. However, the current Part L average EUI in <u>2020 was</u> is 140 kWh/m2/yr.</p> <p>...</p>	To ensure that the Plan sets out effective targets in the context of updated Building Regulations.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
	38	2.1.17	<p>Delays in incorporating up to date carbon factors in Part L can lead to perverse modelling outcomes by overestimating the carbon savings from gas given that the carbon factors currently used in Building Regulations do not take into account the decarbonisation of the electricity grid achieved since 2012 [10]. Part L also overestimates the emissions associated with electricity use over a building's lifetime as it does not consider impacts of further projected reductions in carbon intensity of electricity in coming decades.</p> <p>...</p> <p>Building Regulations are expected to be updated in 2022 and 2025 but current proposals for the Future Homes Standard 2025 do not address the shortcomings set out above and are not ambitious enough to deliver the savings required to achieve our carbon reduction targets [15] [16] [17] [18].</p> <p>...</p>		
	40	2.1.19	<p>...</p> <p>We are committed to driving sustainable design and minimising greenhouse gas emissions through local policies in Merton. Policies CC2.2 minimising greenhouse gas emissions; CC2.3 minimising energy use and CC2.4 low carbon energy are intended to go beyond the London Plan requirements to drive building energy performance which is compatible with our 2050 net-zero carbon target, by maximising on-site savings through energy efficiency and low carbon and renewable energy generation. These policies set out Merton's requirements based on the current Building Regulations (2013 2021) Part L methodology, but also embed recommendations from the Zero Carbon Hub, the CCC 's report on making UK housing fit for the future and, LETI's Climate Emergency Design Guide <u>and the Delivering Net Zero study</u> where possible.</p>		
	55	2.3.16	<p>...</p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>In addition, current Building Regulations (201321) do not address unregulated emissions associated with cooking, white goods and other equipment which can represent up to 50% of a building's operational emissions [9]. Operational performance of buildings therefore cannot be verified using the Part L methodology. The CCC has highlighted the importance of improving building performance monitoring and focussing on 'as built' performance in order to close this performance gap which could deliver £70-260 in annual bill savings per household [11].</p>		
MM14	42	Policy CC2.2 Minimising Greenhouse Gas Emissions	<p>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 <u>minimising</u> greenhouse gas emissions has been made on site.</p> <p>This will be achieved by requiring:</p> <p>All development:</p> <p><u>We will require:</u></p> <p><u>All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:</u></p> <p>e. 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"> o Be lean: use less energy and manage demand during operation o Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly o Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site o Be seen: monitor, verify and report on energy performance 	To ensure that the policy is effective	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:		
MM15	42, 51, 56, 255, 268, 334, 346, 374, 375, 378, 380, 383, 388, 391, 393, 402, 404, 408, 417, 418, 544, 546, 548, 567	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.	No change to HRA findings. No <i>'likely significant effects'</i>
MM16	43	Policy CC2.2 Minimising Greenhouse Gas Emissions, part c	To achieve the relevant minimum carbon reduction targets as set out in the table below:	To ensure justified targets in the context of updated Building Regulations in a manner that is in general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings																											
			<table border="1"> <thead> <tr> <th>Development Type</th> <th>Minimum on-site total reduction in CO₂³</th> <th>Benchmark total reduction in CO₂³</th> </tr> </thead> <tbody> <tr> <td>Major residential development of 10 or more dwellings (including new build, change of use, conversions and major refurbishments)</td> <td>3560%</td> <td>50%+</td> </tr> <tr> <td>Minor new build residential development of 1 or more dwellings⁴</td> <td>3560%</td> <td>50%+</td> </tr> <tr> <td>Minor residential change of use and conversions resulting in the creation of 1 or more dwellings</td> <td>35%</td> <td></td> </tr> <tr> <td><u>Office buildings of 500sqm GIA or more (including new build, change of use and major refurbishments)</u></td> <td>25%</td> <td></td> </tr> <tr> <td><u>School buildings of 500sqm GIA or more (including new build, change of use and major refurbishments)</u></td> <td>35%</td> <td></td> </tr> <tr> <td><u>Industrial buildings of 500sqm GIA or more (including new build, change of use and major refurbishments)</u></td> <td>35%</td> <td></td> </tr> <tr> <td><u>Hotel of 500sqm GIA or more (including new build, change of use and major refurbishments)</u></td> <td>10%</td> <td></td> </tr> <tr> <td><u>All other non-residential development of 500sqm GIA or more (including new build, change of use and major refurbishments)</u></td> <td>35%50%</td> <td></td> </tr> </tbody> </table>	Development Type	Minimum on-site total reduction in CO ₂ ³	Benchmark total reduction in CO ₂ ³	Major residential development of 10 or more dwellings (including new build, change of use, conversions and major refurbishments)	3560%	50%+	Minor new build residential development of 1 or more dwellings ⁴	3560%	50%+	Minor residential change of use and conversions resulting in the creation of 1 or more dwellings	35%		<u>Office buildings of 500sqm GIA or more (including new build, change of use and major refurbishments)</u>	25%		<u>School buildings of 500sqm GIA or more (including new build, change of use and major refurbishments)</u>	35%		<u>Industrial buildings of 500sqm GIA or more (including new build, change of use and major refurbishments)</u>	35%		<u>Hotel of 500sqm GIA or more (including new build, change of use and major refurbishments)</u>	10%		<u>All other non-residential development of 500sqm GIA or more (including new build, change of use and major refurbishments)</u>	35%50%			
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MM17	43, 46	Footnote 3	This represents a minimum improvement beyond Part L of Building Regulations 2013 2021 . When Building Regulations are updated (e.g. The Future Homes Standard expected in 2025) we will seek to apply an equivalent standard against clarify how the policy's requirements relate to the new Building Regulations in an Explanatory Note on Approaches to Sustainable Design & Construction.	To ensure that the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'																											
MM18	43, 44, 47, 636	Policy CC2.2 Minimising Greenhouse Gas Emissions, part e(ii)	off-site provided that an alternative proposal which offers <u>Additionality</u> ⁵ is identified, delivery is certain and subject to agreement with the council. <i>New footnote: ⁵ See Glossary for definition of Additionality</i>	In the interests of effectiveness, to ensure clarity, and to ensure general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'																											
MM19	44	2.2.1	In line with the London Plan, all developments in Merton should are required to maximise on-site carbon savings in accordance with the Mayor of London's energy hierarchy through energy efficiency, the use of clean energy, and on-site renewable energy generation.	To ensure that the Plan is clear and unambiguous and to secure effectiveness.	No change to HRA findings. No 'likely significant effects'																											

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM20	47	2.2.10 – 2.2.11	<p>In 2019/2020, a study commissioned by several London boroughs (<u>Towards Net Zero Carbon</u>), to investigate the cost of carbon and its role in achieving greater carbon reductions on site, found that the London Plan on-site carbon reduction targets and cost of carbon were are inadequate for delivering the savings required to achieve net-zero carbon [12]. <u>The Towards Net Zero Carbon study demonstrated that due to the decarbonisation of the electricity grid, for the same specifications, a greater improvement over Part L was achieved with no extra effort/cost. The study also concluded that a carbon offset price of £60-£95/tCO2 was not sufficient for local authorities to deliver the required carbon savings off site.</u> The study demonstrated that, using more up to date carbon emissions factors than those used in Building Regulations 2013 (SAP 10 and SAP 10.1)⁹, with an efficient low carbon heating system (e.g. a heat pump) and reasonable levels of fabric and ventilation performance, new build residential and non-residential developments can and should achieve at least a 60% and 50% improvement against Building Regulations 2013 respectively. The decarbonisation of the electricity grid means that, for the same specifications, a greater improvement over Part L is achieved with no extra effort/ cost.</p> <p><u>In 2022, following the adoption of Part L 2021 of Building Regulations, Merton and 17 other London boroughs commissioned a review of the Towards Net Zero Carbon study against Part L 2021. This review (Delivering Net Zero, May 2023) tested several building typologies against Part L 2021 and recommended the following percentage improvement targets [51]:</u></p> <ul style="list-style-type: none"> <u>• Domestic buildings: 65% better than Part L 2021</u> <u>• Office buildings: 25% better than Part L 2021</u> <u>• School buildings: 35% better than Part L 2021</u> <u>• Industrial buildings: 45% better than Part L 2021</u> 	To ensure that the Plan includes effective targets in relation to updates to the Building Regulations.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<ul style="list-style-type: none"> • <u>Hotel: 10% better than Part L 2021</u> • <u>Other non-domestic buildings: 35% better than Part L 2021</u> <p><u>The Delivering Net Zero study was developed in response to changes to Part L of Building Regulations which came into effect in 2022. As such, this local evidence was completed and published at a late stage of the Examination process of this Local Plan. As a result of this, Policy CC2.2(c) contains the minimum targets and benchmarks set out in the Mayor's Energy Assessment Guidance 2022 apart from where the Delivering Net Zero study identified targets which are lower than the minimum target set out in the Mayor's Energy Assessment Guidance (i.e. 35% improvement against Part L 2021). Nonetheless, as set out in Policy CC2.2(b), all development resulting in the creation of one or more dwellings or 500sqm or more non-residential GIA will be required to demonstrate how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net zero carbon emissions on site.</u></p> <p>In order to drive on-site carbon reduction, we therefore require all major residential development of 10 or more units (including new builds, change of use, conversions and major refurbishments) and all minor new build residential development of 1 or more units to achieve at least a 60% improvement against Building Regulations 2013 on site. All non-residential development of 500sqm or more GIA (including new builds, change of use and major refurbishments) will need to achieve at least a 50% improvement against Building Regulations 2013 on site. All minor change of use and conversions resulting in the creation of 1 or more dwellings will need to achieve at least a 35% improvement against Building Regulations 2013 on site to account for the limitations associated with existing buildings and small-scale development.</p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM21	48	2.2.15-2.2.16	<p>Etude et al. [12] found that the The London Plan 2021 carbon offset price (£95/tCO2 in the London Plan 2021) is too low to actually deliver equivalent carbon savings and therefore does not incentivise sufficient on-site savings [12][51]. Indeed, the cost of installing additional PV to achieve further improvement on site is currently at around £190/t and this cost is expected to increase to £325/t using the SAP 10.1 carbon factors as a result of the further decarbonisation of grid electricity. This means that, uUsing the cost of carbon recommended in the London Plan 2021, it is cheaper and easier for developers to offset carbon emissions via cash-in-lieu contributions than it is to achieve the actual savings on site, resulting in developments with higher operational emissions and local authorities with insufficient funds to deliver equivalent carbon savings off site.</p> <p>In 2019, Etude et al. also found that it would cost a local authority at least £300/t to save carbon in a sustainable way, taking into account administration and management costs [12]. Local authorities therefore have insufficient funds to deliver equivalent carbon savings off site through cash-in-lieu contributions using a cost of carbon of £95/t.</p>	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM22	48	2.2.17	<p>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/tCO2 as of 2021. The price for offsetting carbon is regularly reviewed; if prices were to change significantly this may trigger review of the Policy to determine whether updates would be needed. Any changes to Merton's suggested carbon offset price will be updated in future guidance.</p>	In the interests of the Plan's effectiveness.	No change to HRA findings. No 'likely significant effects'
MM23	49	2.2.21	<p>Developers will be expected to adopt the highest possible standards of fabric and ventilation and heating plant to maximise carbon savings on site. Any development that fails to achieve the necessary on-site performance targets or to demonstrate that</p>	To ensure that the Plan is justified and in general conformity	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>carbon savings have been maximised, must provide full evidence and justification as to why the scheme is unable to comply. Where the developer contends the policy requirements in relation to viability of a particular proposal, the onus would lie with the developer to demonstrate what can viably be achieved through the submission of a viability assessment. We may seek payments from applications for the cost of independent viability assessment(s). <u>Where it has been demonstrated that planning considerations cannot viably be supported, Policy IN14.1 sets out the infrastructure prioritisation that applicants and decisions-makers should apply in accordance with Policy DF1 of the London Plan.</u></p>	with the London Plan.	
MM24	50 and 52	Climate Change CC2.3 Minimising Energy Use, part c and 2.3.5	<p>To achieve the following minimum on-site carbon savings through energy efficiency alone, as part of achieving the overall savings set out in Policy CC2.2 (c) Minimising Greenhouse Gas Emissions, in order to reduce energy demand:</p> <p>i. All development resulting in the creation of 1 or more residential units (including new builds, change of use, conversions and major refurbishments) must achieve at least a 10 per cent improvement against Building Regulations 2013* through energy efficiency measures.</p> <p>ii. All non-residential development of 500sqm GIA or more (including new builds, change of use and major refurbishments) must achieve at least a 15 per cent improvement against Building Regulations 2013 through energy efficiency measures.</p> <p>*NEW FOOTNOTE: Once the GLA have adopted their updated Energy Assessment Guidance 2022, an updated target will be published in Merton's Explanatory Note on Approaches to Sustainable Design and Construction in line with the GLA's latest guidance.</p>	To secure the effectiveness of the Plan following updates to Building Regulations.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings																
			<p>....</p> <p>2.3.5. Merton Council therefore requires compliance with minimum on-site carbon reduction targets through energy efficiency alone in line with the London Plan. Developers will need to demonstrate a 10% and 15% improvement for all residential development resulting in the creation of 1 or more units and non-residential development of 500sqm GIA respectively (including new builds, change of use, conversions and major refurbishments).</p>																		
MM25	51	Climate Change CC2.3 Minimising Energy Use, part d	<p>To demonstrate compliance with the following relevant fabric efficiency targets*:</p> <table border="1"> <thead> <tr> <th>Type of Development</th> <th>Zero Carbon Hub Interim FEES until 31 December 2022²²</th> <th>Zero Carbon Hub Full FEES from 01 January 2023 to 31 December 2024</th> <th>Space Heating Demand Target from 01 January 2025²³</th> </tr> </thead> <tbody> <tr> <td>Blocks of flats and mid-terrace houses</td> <td><43 kWh/m²/yr</td> <td><39 kWh/m²/yr</td> <td><15 kWh/m²/yr</td> </tr> <tr> <td>Semi-detached, end of terrace and detached houses</td> <td><52 kWh/m²/yr</td> <td><46 kWh/m²/yr</td> <td><20 kWh/m²/yr</td> </tr> <tr> <td>Non-residential development</td> <td>-</td> <td>-</td> <td><15 kWh/m²/yr</td> </tr> </tbody> </table> <p>*NEW FOOTNOTE – Both the Fabric Energy Efficiency Standard and Space Heating Demand Target are based on regulated energy use.</p>	Type of Development	Zero Carbon Hub Interim FEES until 31 December 2022 ²²	Zero Carbon Hub Full FEES from 01 January 2023 to 31 December 2024	Space Heating Demand Target from 01 January 2025 ²³	Blocks of flats and mid-terrace houses	<43 kWh/m ² /yr	<39 kWh/m ² /yr	<15 kWh/m ² /yr	Semi-detached, end of terrace and detached houses	<52 kWh/m ² /yr	<46 kWh/m ² /yr	<20 kWh/m ² /yr	Non-residential development	-	-	<15 kWh/m ² /yr	To ensure that the Plan is effective following updates to the Building Regulations. In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
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MM26	51	Climate Change CC2.3 Minimising Energy Use, part e	<p>From 2025, to meet the maximum Energy Use Intensity targets as set out in the relevant guidance.</p>	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'																
MM27	56	2.3.22 and new paragraph	<p>Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to future-proof their development and lead the way in decarbonising Merton until EUI targets are required through national regulations or a locally derived methodology. Merton Council will enforce EUI targets from 2025; these targets will be confirmed in relevant guidance closer to the time in order to</p>	To ensure that the Plan is effective and justified.	No change to HRA findings. No 'likely significant effects'																

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>consider the latest evidence and technologies. <u>In 2022/2023 Etude et al. modelled several building typologies to identify the following Energy Use Intensity benchmarks for a range of development types for a consortium of 18 London boroughs including Merton [51]:</u></p> <ul style="list-style-type: none"> • <u>Residential – 35 kWh/m2/yr</u> • <u>Student or key worker accommodation, care homes, extra care homes - 35 kWh/m2/yr</u> • <u>Warehouses and light industrial units – 35 kWh/m2/yr</u> • <u>Schools - 65 kWh/m2/yr</u> • <u>Offices, Retail, HE teaching facilities, GP surgeries – 70 kWh/m2/yr</u> • <u>Hotels - 160 kWh/m2/yr</u> <p><u>New Paragraph - Merton Council expects all new development to make all reasonable but commercially prudent endeavours to achieve these EUI and space heating demand benchmarks in demonstrating that it has made the fullest contribution to minimising energy use in accordance with Policy CC2.3. In doing so, developments would help to tackle fuel poverty and lead the way in decarbonising Merton in a manner that ‘future-proofs’ its new building stock.</u></p> <p><u>[25] – Bioregional, Etude, Currie & Brown, “Greater Cambridge Local Plan: Net Zero Carbon Evidence Base. Task D – Technical Feasibility,” May 2021. [Online]. Available: Feasibility study https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/NetZeroTechnicalFeasibility_GCLP_210831.pdf.</u></p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>[26] Bioregional, Etude, Currie & Brown, Mode, “Greater Cambridge Net Zero Carbon Evidence Base Non-technical summary,” August 2021. [Online]. Available: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Greater%20Cambridge%20Local%20Plan%20Net%20Zero%20Carbon%20Evidence%20Base%20-%20Non%20Technical%20Summary%20FINAL.pdf.</u></p> <p><u>[51] Etude, Levitt Bernstein, Introba, Inkling, Currie & Brown, “Delivering Net Zero – An evidence study to support planning policies which deliver Net Zero Carbon developments”, May 2023. [Online] Available: https://www.merton.gov.uk/planning-and-buildings/sustainability-and-climate-change/buildings-and-energy</u></p>		
MM28	57, 59	Policy CC2.4 Low Carbon Energy, part a	All new development to use low carbon heat. There can be no gas boilers in new dwellings or new non-domestic residential development in Merton from January 2023.	To ensure that the Plan is effective and justified.	No change to HRA findings. No <i>‘likely significant effects’</i>
MM29	61	New paragraph below 2.4.14	<u>Where heat pumps are proposed developers will also need to ensure that living conditions of existing and future occupiers of the proposed development and neighbouring properties are not materially harmed in terms of outlook, noise or vibrations in line with Design Policies D12.3 (g) and D12.4 (g), and Pollution Policy P15.10.</u>	To ensure that the Plan is effective and consistent with national policy.	No change to HRA findings. No <i>‘likely significant effects’</i>
MM30	64	Policy CC2.5 (a-d)	3.3 Minimising Waste and Promoting a Circular Economy Merton Council will require all All development proposals to <u>should</u> adopt a circular economy approach to building design and construction, <u>and be designed for durability, flexibility and easy disassembly</u> , to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.	To ensure that the policy is clear and effective.	No change to HRA findings. No <i>‘likely significant effects’</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>This will be achieved by requiring:</p> <p>All development:</p> <p>a. Where existing buildings are on site, to To prioritise their 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, and designing building shapes and forms, that can easily be maintained, repaired and renewed across the development lifetime.</p> <p>d. To minimise the environmental impact of materials by specifying sustainably sourced, low impact and re-used or recycled materials; this should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally sourced wherever possible to minimise transport emissions.</p>		
MM31	64	Policy CC2.5 (e)	<p>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 actions taken to reduce life-cycle carbon emissions.</p>	In the interests of clarity.	No change to HRA findings. No ‘likely significant effects’
MM32	82 and 85	3.1.9. and 3.1.14	3.1.9. Merton supports the Mayor of London’s proposal that Colliers Wood is part of the new London Plan’s proposed Opportunity Area at “Wimbledon / South Wimbledon /	To secure general conformity with the London Plan.	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>Colliers Wood with a target of 5,000 homes and 6,000 jobs.</p> <p>3.1.14. However, there are opportunities outside the immediate Wimbledon area in Colliers Wood, South Wimbledon and Morden to work towards delivering the London Plan's proposed Opportunity Area indicative targets figures for homes and jobs, even if the Crossrail2 sites will not be realised within this Plan period.</p>		No 'likely significant effects'
MM33	85	3.1.18	<p>Colliers Wood town centre Site allocation CW2 may be an appropriate location to accommodate higher density development including tall buildings. <u>A local Design Guide or Design Code, that provides a design-led approach to help optimise the capacity of the site while ensuring that the final design reflects local character and design preferences, should be prepared, either by applicants or the council</u> Britannia Point should remain the pinnacle building in the town centre in terms of height. This can then form the basis for a coherent group of buildings that relate well to each other in terms of scale, massing, form and architecture. New buildings must be designed, orientated and laid out within the site and within the context of nearby buildings and structures to mitigate the potential for uncomfortable wind conditions at ground level, which would particularly affect pedestrians and cyclists. <u>The National Design Guide and National Model Design Code will be used to guide decisions on any applications that may come forward in advance of the production of locally produced design guides or codes.</u></p>	To secure general conformity with the London Plan and to ensure that the Plan is positively prepared, justified, effective, and consistent with national policy relating to making effective use of land and achieving well-designed places (sections 11 and 12 NPPF).	No change to HRA findings. No 'likely significant effects'
MM34	86	Paragraphs: 3.1.22; 5.1.4; 5.1.5; 10.2.5; 11.3.10; 13.3.6; 13.4.5; 14.2.31; 15.2.1; 15.6.23; 16.5.4.	Environmental factors, particularly the risk of flooding, as identified in the Sustainability Appraisal and the Strategic Flood Risk Assessment 2018 , will need to be mitigated against before Colliers Wood can deliver to its full potential. Flood mitigation measures and any other environmental considerations will have to be economically viable and in line with the overall aim of creating a thriving and attractive town centre if they are to benefit the area. <u>Please also refer to Policy IN 14.1 (Infrastructure).</u>	To ensure that the Plan is justified, effective and in general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM35	89	Site Allocation CW1, Design and accessibility guidance:	Development should protect and enhance the existing cycle and pedestrian route. The site may be required to make provision for docking areas for cycle/ scooter hire schemes. <u>TfL's strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. There is also an anticipated requirement for space to accommodate docking areas for cycle / scooter hire schemes considering the high expected demand in this location. However, there is a lack of space on the public highway to facilitate additional cycle parking. Consideration should be given to the feasibility of providing publicly accessible secure cycle parking and / or docking areas for cycle or scooter hire schemes on this site at ground level, either as part of any development or if development does not take place.</u>	In the interests of clarity and to secure the effectiveness of the Plan.	No change to HRA findings. <i>No 'likely significant effects'</i>
MM36	89, 92, 96, 99, 102, 229, 232, 235, 238, 241, 247, 293, 296, 307	Site Allocation CW1, Design and accessibility guidance	Development proposals must incorporate the recommendations of Merton's Strategic Flood Risk Assessment (SFRA). <u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>	To ensure that the Plan is justified and effective.	No change to HRA findings. <i>No 'likely significant effects'</i>
MM37	89	Site Allocation CW1,	There is a need for secured cycle parking provision for commuters in Colliers Wood and there is a lack of space on the public highway to facilitate this. Should residential development not take	To ensure clarity.	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
		Infrastructure Requirements:	place on Site CW1, then we would welcome a secure cycle hub on this site as it is opposite the underground station and accessible to both the Wandle Trail and the Cycle Superhighway.		No 'likely significant effects'
MM38	89	All Site Allocations, Infrastructure Requirements:	Development proposals for this site must <u>refer to the Merton Infrastructure Delivery Plan and ensure infrastructure requirements have been addressed by the proposal.</u> have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.	To secure the Plan's effectiveness.	No change to HRA findings. No 'likely significant effects'
MM39	92	Site Allocation CW2, Design and accessibility guidance, point 3	Development will need to be of a scale, layout and design to minimise harm to the residential amenity of the existing residents in Britannia Point and on Christchurch Road. Development must be based on the principle of the existing Britannia Point building remaining the pinnacle in terms of height, with other buildings forming a coherent cluster that enhances the wider Colliers Wood area.	To ensure the Plan is positively prepared, effective, justified and consistent with national policy and the London Plan.	No change to HRA findings. No 'likely significant effects'
MM40	92	Site Allocation CW2, Design and accessibility guidance:	<u>TfL's strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. However, there is a lack of space on the public highway to facilitate this, so this</u> The site may be required to make provision for an <u>appropriate amount and type of</u> publicly accessible cycle storage (hub) <u>for commuters. There is also an anticipated requirement for space to accommodate docking areas to facilitate future cycle or scooter hire schemes considering the high expected demand in this location so, where appropriate, development may be required to make some provision for</u> and docking stations for cycle/scooter hire schemes in proximity to the public highway.	Amended wording in the interests of clarity and to secure the effectiveness of the Plan.	No change to HRA findings. No 'likely significant effects'
MM41	93	Site Allocation CW2 Infrastructure Requirements:	<u>This site is in close proximity to National Grid infrastructure YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To</u>	To ensure that the Plan is clear and effective.	No change to HRA findings. No 'likely significant effects'

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			<p><u>comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.</u></p>		
MM42	93	Site Allocation CW2 Infrastructure Requirements:	Thames Water have indicated that the scale of development for this site that, upgrades of the water supply network infrastructure and wastewater network and sewage treatment infrastructure are likely.	To ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM43	93	Site Allocation CW2 Infrastructure Requirements (also CW5, Mi1, Mi8, Mi16, Mo1, Mo2, Mo3, Mo4, RP3, RP4, RP6, RP7, RP8, Wi5, Wi11, Wi12, Wi13, Wi16)	The developer can request information on network infrastructure by visiting the Thames Water Developer Services website (https://www.thameswater.co.uk/developers) https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	To ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM44	93	Site Allocation CW2, Approach to tall buildings	A mixed-use redevelopment within the site could include taller 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 of buildings that enhances the wider Colliers Wood area. The	To secure general conformity with the London Plan and to ensure that the Plan is positively prepared, justified,	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>Merton Character Study 2021 indicates that buildings of around 52m (approximately 15 storeys) may be appropriate on this site. However, appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code which could be prepared either by applicants or the council. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account the guidance contained in the National Design Guide and the National Model Design Code. In the absence of a Design Guide or Design Code the National Design Guide and the National Model Design Code will be used to guide decisions on future applications.</u>	effective, and consistent with national policy relating to making effective use of land and achieving well-designed places (sections 11 and 12 NPPF).	
MM45	93	Site Allocation CW2, Impacts on Archaeological Priority Area	Yes, Wandle Valley/Colliers Wood Archaeological Priority Zone Area Tier 2 (Change all references to 'Archaeological Priority Zone', to 'Archaeological Priority Area', including the related acronyms, APZ to APA, throughout the Local Plan)	To secure general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'
MM46	93, 104, 134, 136, 139	Site Allocation CW2, Impacts on Archaeological Priority Area	Yes, Wandle Valley/Colliers Wood Archaeological Priority Zone Area Tier 2 (Change all references to 'Archaeological Priority Zone', to 'Archaeological Priority Area', including the related acronyms, APZ to APA, throughout the Local Plan)	To secure general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'
MM47	96, 152, 157, 227, 281, 290, 302, 305,	Site Allocation CW3, Infrastructure Requirements	This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on-site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
	311, 317				
MM48	96, 121, 130, 160, 281, 485	Site Allocation CW3, Infrastructure Requirements	The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.	To ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM49	99	Site Allocation CW4 Design and accessibility guidance:	<u>TfL's strategic cycling analysis has identified a need for significant additional secured cycle parking provision for commuters in Colliers Wood which should include the provision of a cycle hub facility to enable the long stay secure cycle storage required for commuter trips. There is also an anticipated requirement for space to accommodate docking areas for cycle/ scooter hire schemes considering the high expected demand in this location. However, there is a lack of space on the public highway to facilitate additional cycle parking. Redevelopment of the station should make provision for an appropriate amount and type of cycle storage for commuters and/ or provision of docking stations for cycle/scooter hire schemes in proximity to the public highway.</u>	In the interests of clarity and to secure the effectiveness of the Plan.	No change to HRA findings. No 'likely significant effects'
MM50	101	Site Allocation CW5, site map	(Map replaced with the following .)	In the interests of clarity and effectiveness.	No change to HRA findings. No 'likely significant effects'
MM51	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 to ensure consistency with the London Plan.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM52	102	Site Allocation CW5, Design and accessibility guidance:	<u>In line with the Environment Agency requirements, development proposals must enhance the Pickle Stream corridor, including the removal of concrete banks, restoration of ecology to the watercourse and inclusion of a 10m wide riverside buffer strip.</u>	In the interests of clarity, and to ensure consistency with national policy insofar as it requires planning policies to contribute to and enhance the natural and local environment.	No change to HRA findings. No <i>'likely significant effects'</i>
MM53	104	Site Allocation CW5, Impacts a designated open space	<u>Yes, the western edge</u> Parts of the site to the south are <u>is</u> Metropolitan Open Land (<u>MOL</u>) and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer. <u>Refer to Appendices for further information on MOL.</u>	To ensure clarity and effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>
MM54	111, 112	Policy N4.1, various	Mitcham Town <u>District</u> Centre	To ensure that the Plan is justified and effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM55	119	Site Allocation Mi1 Benedicts Wharf, Site deliverability	<u>5-10-15</u> years.	To ensure that the Policy is justified and effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM56	121, 178, 185, 202, 204, 233, 267, 408, 409, 410	Site Allocation Mi1 Benedicts Wharf, Approach to tall buildings	The size of the site allows for a masterplanned approach which could contain taller (<u>MM6</u>) buildings. <u>Evidence supporting the planning permission relating to the site indicates that buildings of around 33m (approximately 10 storeys) may be appropriate. However, appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code, which could be prepared either by applicants or the council. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account the guidance contained in the National Design Guide and the National Model Design Code. In the</u>	To ensure general conformity with the London Plan and to ensure that the Plan is positively prepared, justified, effective, and consistent with national policy relating to making effective use of land and achieving well-	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>absence of a Design Guide or Design Code, the National Design Guide and the National Model Design Code will be used to guide decisions on future applications.</u>	designed places (sections 11 and 12 NPPF).	
MM57	128	Site Allocation Mi3, under Infrastructure Requirements, new paragraph at the end of the part	<u>The developer must consult and engage with the Metropolitan Police Service (MPS) on any development proposals to prevent future development from adversely affecting the MPS's operational facilities. The Council will also engage with MPS to seek advice during any pre or planning application processes.</u>	To ensure that the policy is clear and effective.	No change to HRA findings. No 'likely significant effects'
MM58	130, 154, 196, 229, 232, 235, 244, 299	Site Allocation Mi4, under Infrastructure Requirements	This site is located in an area identified as being deficient <u>of deficiency</u> in access to nature. The council will require <u>expect</u> proposals to alleviate <u>address</u> this deficiency in accordance with the Green Infrastructure policies.	In the interests of clarity and to ensure that the policy is justified.	No change to HRA findings. No 'likely significant effects'
MM59	132	Site allocation Mi5, Design and accessibility guidance:	Development proposals need to be sympathetic to the historic setting, particularly of Canons House and the views from the nearby Metropolitan Open Land <u>and have regard to The Canons Conservation Area Management Plan.</u>	To ensure that the policy is effective.	No change to HRA findings. No 'likely significant effects'
MM60	139	Site Allocation Mi8, Infrastructure Requirements	<u>Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The</u>	To ensure that the policy is effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>developer can request information on network infrastructure by visiting the Thames Water website</u> https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.</p> <p>Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site.</p>		
MM61	146	Site Allocation Mi11 Raleigh Gardens car park, Approach to tall buildings	<p>Approach to tall buildings: Development of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.</p>	To ensure that the Plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>
MM62	159, 161	Site Allocation Mi16 Mitcham Gasworks Western Road, Indicative site capacity (p 159), Approach to tall buildings (p161)	<p>Indicative site capacity: 200-400 <u>500- 650</u> new homes</p> <p>Design and accessibility guidance: The site had outline planning permission for a major residential and employment scheme. The residential element has been delivered over 5 years ago (Hay Drive etc). However, the employment part of the permission (which extended onto the site surrounded by the red line, reaching Western Road) lapsed in July 2012. The site's potential uses, and layout is currently constrained by the c33metre high gasholder that stood on the corner of Western Road and Portland Road was demolished in early 2022. Although the gasholder is no longer used, it has not been officially decommissioned. The landowners are proposing it decommission but until that time development within the vicinity of the gasholder is currently subject to restrictions set out in the Health and Safety Executive's land use planning method (PADH) which limits the potential for residential-led mixed use development until the gasholder is decommissioned.</p>	To ensure that the Plan is in general conformity with the London Plan, is positively prepared, justified and consistent with national policy relating to making effective use of land and achieving well-designed places (sections 11 and 12 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>

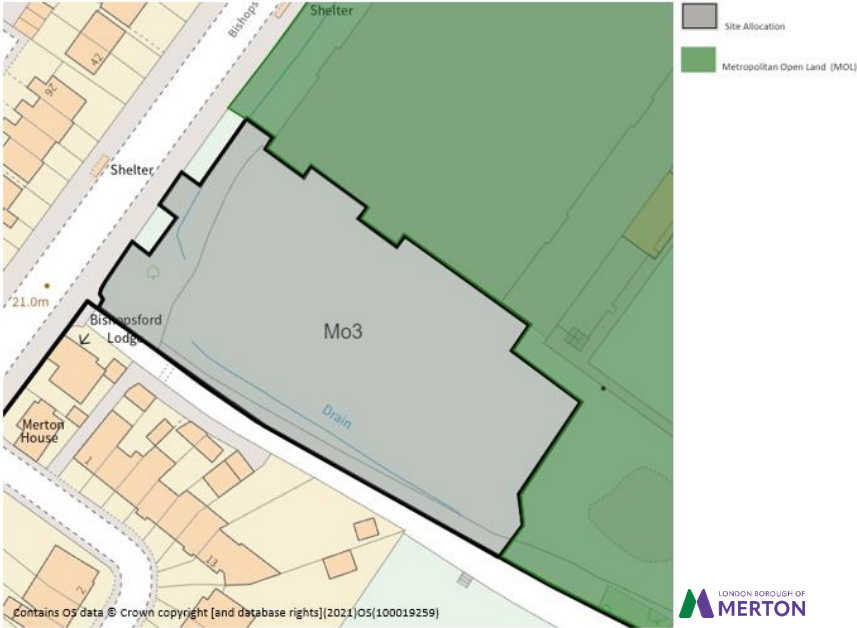
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>The site is subject to a Hazardous Substance Consent (HSC). An application for the continuation of this HSC was granted in 2002 (Ref: 02/P1493). The decommissioning the site and the cancellation of the HSC requirements to enable the redevelopment of the site. The site accommodates two electricity sub stations, an operational gas Pressure Reduction Station (PRS) and above ground gas mains stemming from the historic installation use. A 65metre large redundant gas holder and telecoms mast are is found to the north of the site on the SGN (Southern Gas Networks) owned land. The site would require decontamination due to its earlier use.</p> <p>Approach to tall buildings A mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.</p> <p><u>Initial analysis of the site indicates that its character, appearance and size could provide opportunities for buildings of a range of heights that would allow for a greater variety in building types and forms, which could enhance visual interest whilst ensuring that optimal use would be made of this previously developed land. The analysis indicates that an upper limit of around 33m (10 storeys) may be appropriate on this site, alongside the provision of a replacement telecoms mast.</u></p> <p><u>Appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code which could be prepared either by applicants or the council. The Design Guide or Design Code should be based on effective community engagement and reflect local aspirations for the development of the area and should take into account the guidance contained in the National Design Guide and the National Model Design Code. In the absence of a Design Guide or Design Code the National Design Guide and the</u></p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>National Model Design Code will be used to guide decisions on future applications.</u>		
MM63	160	Site Allocation Mi16, under Design and accessibility guidance	A large redundant gasholder and telecoms mast is are found to the north of the site on the SGN (Southern Gas Networks)-owned land. The site would require decontamination due to its earlier use.	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM64	173, 176, 177, 178, 181, 183, 184, 185, 187, 188, 202	Morden: Policy N5.1, KEY OBJECTIVES: MORDEN	3.5 Providing more high quality homes Incorporate Provide new homes in the <u>Morden and in particular, within the Morden Regeneration Zone.</u> Wider Morden Town Centre Area creating a diverse mix of housing sizes and tenures.	In the interests of clarity and effectiveness.	No change to HRA findings. No 'likely significant effects'
MM65	176	Morden: Policy N5.1 map	<i>Delete map</i>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM66	176, 5.1.18, 5.1.23, 5.1.60, Site Allocation Mo3 (moved), under 'Impacts a designa	Morden Policy N5.1 text	...intensification and comprehensive development <u>regeneration</u> within Morden Regeneration Zone...	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
	ted open space', new paragraph below text				
MM67	177, 180, 182, 190, 202	Morden: Policy N5.1 part a	Development p Proposals for large sites (0.25 hectares and above) that assist contribute to the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo41 (AM87), will be supported.	To ensure that the Plan is positively prepared and justified.	No change to HRA findings. No 'likely significant effects'
MM68	178	Morden: Policy N5.1 part e	Supporting tall buildings within the Morden Regeneration Zone in accordance with the details in the Strategic Heights Diagram for the Morden Regeneration Zone and in Policy D12.6 Tall Buildings and in limited locations within the Wider Morden Town Centre Area, where they are considered appropriate in order to facilitate intensified development. Tall buildings should be located appropriately and relate well to the surrounding context and public realm, particularly at street level. Tall buildings must be informed by comprehensive townscape appraisal and visual assessment	To secure general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'
MM69	178	Morden: Policy N5.1 part h and 5.1.20	Supporting incremental site-by-site development outside the Morden Regeneration Zone but within the Wider Morden Town Centre Area, where it: <ul style="list-style-type: none"> • is of a high-quality design, • complements and co-ordinates with the surrounding built form and public realm, • supports the delivery of new homes and complementary town centre uses, and • makes it easier for all to get around and in particular, encourages walking and cycling <p>...</p>	To ensure that the Plan is clear.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			5.1.20 The part of the Wider Morden Town Centre Area that is outside the Morden Regeneration Zone, is the area for incremental change, where the design and layout of public realm and streetscape is to be actively co-ordinated by the council, so that the Morden Regeneration Zone sits well within the local context.		
MM70	180	New paragraph below 5.1.11	<u>Development proposals for large sites (0.25 hectares and above) that come forward to contribute to the delivery of comprehensive regeneration, as stated in Policy N5.1 part a, should have regard to the vision, objectives and principles set out in the SDF.</u>	To ensure the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'
MM71	181	5.1.12	The Wider Morden Town Centre Area <u>Morden town centre</u> is within an Opportunity Area as designated in the London Plan 2021 <u>and identified in Figure 2: Opportunity Area, in Chapter 1B 'Good Growth'</u> . We will <u>work with the GLA to</u> (AM96) produce an Opportunity Area Planning Framework, <u>subject to GLA priorities and resources</u> , which will include the significant contribution that the Wider Morden Town Centre Area <u>Morden Regeneration Zone</u> will make towards the Opportunity Area's target to accommodate 5000 new homes and 6000 new jobs.	To ensure general conformity with the London Plan and in the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM72	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 strategy 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</u> site can be developed in a comprehensive manner, to avoid fragmented development and suboptimal densities in this highly accessible location...	To ensure that the Plan is effective.	No change to HRA findings. No 'likely significant effects'
MM73	182	5.1.18	... <u>References to comprehensive regeneration in this policy refer to the nature and scale of the regeneration and not a delivery method</u> (MM66) <u>and, in accordance with London Plan policies H1 and H2, references to large sites in this policy refer to sites of 0.25 hectares and above.</u>	To ensure that the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM74	183	5.1.23	<p><i>Add the sentence at the end of the paragraph.</i></p> <p><u>The new bus standing facilities are identified as a medium to long term requirement in the Infrastructure Delivery Plan 2021 and in accordance with policy IN 14.1 Infrastructure, developments may be required to make planning contributions towards the provision of these facilities.</u></p>	To achieve consistency with national policy, which requires plans to set out the contributions expected from development (per paragraph 34 of NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM75	185	5.1.34	<p><u>The Strategic Heights Diagram for the Morden Regeneration Zone indicatively illustrates a composition of appropriate building heights that locate the tallest buildings on and around Morden underground station. To avoid inappropriate abrupt transitions of building heights, the redevelopment of sites immediately adjacent to the tall building boundary and indicative clusters identified in the Strategic Height Diagrams, should be supported by a local Design Guide or Design Code, as set out in Policy D12.6 'Tall buildings'. The proposed height for each building within the Morden Regeneration Zone will need to be justified in accordance with the criteria in policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'. The scale of existing buildings...</u></p>	To ensure the Plan is positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>
MM76	187	5.1.46	<p><u>As identified in the Infrastructure Delivery Plan 2021, the comprehensive regeneration of the Morden Regeneration Zone is likely to trigger the need for additional health infrastructure to meet local needs.</u> Morden Road Clinic has also been identified by the NHS (National Health Service) as a site allocation (Mo5)...</p>	To achieve consistency with national policy, which requires plans to set out the contributions expected from development (per	No change to HRA findings. No <i>'likely significant effects'</i>

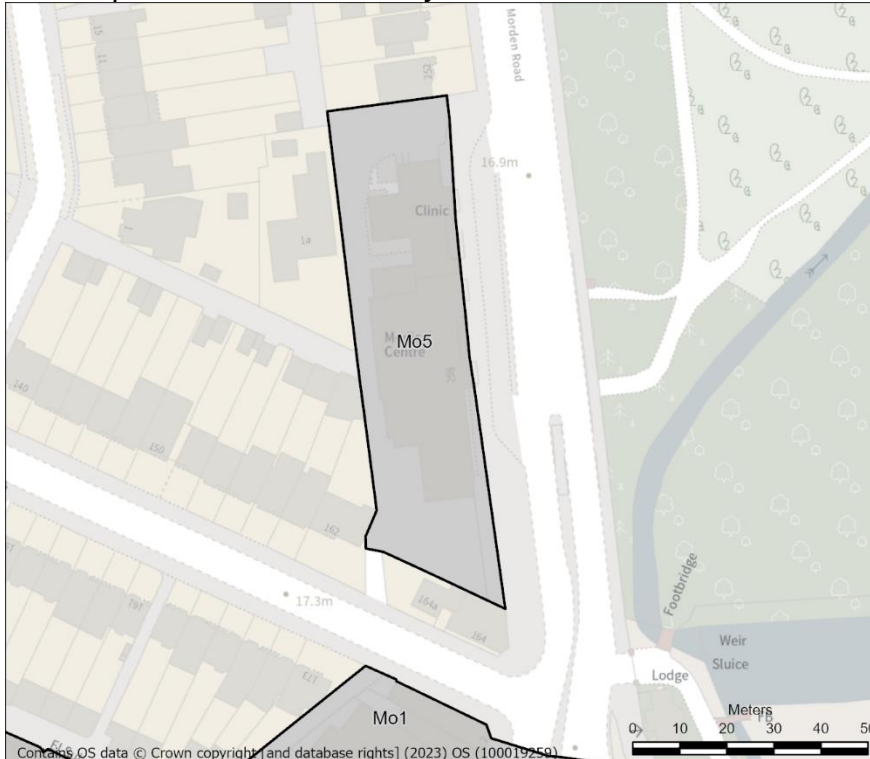
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
				paragraph 34 of NPPF).	
MM77	193-212	All Site Allocations	Development proposals for this site must <u>refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</u> have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.	To achieve consistency with national policy, which requires plans to set out the contributions expected from development (per paragraph 34 of NPPF).	No change to HRA findings. No 'likely significant effects'
MM78	198	Site Allocation Mo3, (moved) site map	<p>(Map replaced with the following:)</p> 	To ensure that the plan is effective and in the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM79	199	Site allocation Mo3 (moved),	Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the	To ensure that the Plan is effective,	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
		Infrastructure Requirements	<p>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 and accompanying plans or Landscaping Plan submitted with any planning application.</p> <p><u>In accordance with NPPF 142, proposals for this site must also include compensatory improvements to the environmental quality and accessibility of the Wandle Valley MOL, to mitigate against the loss of the MOL on site. 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>	consistent with national policy and in general conformity with the London Plan.	No ' <i>likely significant effects</i> '
MM80	202	Site Allocation Mo4, Site deliverability	Commencement within 5 years and delivery in phases within 10-15 years.	To ensure that the Plan is effective and justified in these terms.	No change to HRA findings. No ' <i>likely significant effects</i> '
MM81	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 5	<p>Incorporating green infrastructure and where appropriate, contributing to <u>that contributes to improved drainage, air quality and</u> the creation of green links through the Wider Morden Town Centre Area <u>Morden Regeneration Zone</u>,...</p>	In the interests of clarity, effectiveness, and to secure consistency with national policy insofar as it expects planning policies to aim to achieve healthy places (NPPF paragraph 92), that major developments should incorporate sustainable drainage	No change to HRA findings. No ' <i>likely significant effects</i> '

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
				systems (NPPF paragraph 169); and that opportunities to improve air quality or mitigate impacts should be identified, such as through green infrastructure enhancement (NPPF paragraph 186).	
MM82	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 6	The use of tall buildings where appropriate <u>and in accordance with the Strategic Heights Diagram for the Morden Regeneration Zone and Policy D12.6 'Tall Buildings'</u> , in order to optimise development that relates well to the surrounding context and public realm, particularly at street level.	To ensure general conformity with the London Plan.	No change to HRA findings. <i>No 'likely significant effects'</i>
MM83	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 7	The provision of an appropriate mix of retail, office, community and leisure uses, including night time uses, which provide an appropriate level of active frontage <u>and do not have an unacceptable impact on the living conditions of neighbouring occupier</u>	To make sure that the policy is justified and consistent with national policy insofar as it expects planning policies to ensure that developments ensure that developments create places with a high standard of amenity (NPPF paragraph 130(f)).	No change to HRA findings. <i>No 'likely significant effects'</i>
MM84	202	Site Allocation Mo4, Design and accessibility guidance: new paragraph below	<u>Development proposals for large sites (0.25 hectares and above) such as 34-44 London Road, that contribute to the delivery of comprehensive regeneration, could be brought forward at any time in the plan period.</u>	To ensure that the Plan is justified and effective in these terms.	No change to HRA findings. <i>No 'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
		the first paragraph			
MM85	202	Site Allocation Mo4, Design and accessibility guidance: text	<p>In accordance with <u>the Strategic Heights Diagram for the Morden Regeneration Zone</u> a plan-led approach, taller (MM6) buildings would be acceptable in this town centre site, to...</p> <p>In accordance with <u>the Strategic Heights Diagram for the Morden Regeneration Zone and Policy D12.6 'Tall Buildings'</u> a plan-led approach, taller (MM6) buildings would be acceptable in this town centre site, to ensuring the best use of this land that benefits from excellent public transport accessibility. Tall buildings must however relate well to the surrounding context and public realm, particularly at street level and must be informed by a comprehensive townscape appraisal and visual assessment <u>Design Guide or Design Code to demonstrate the appropriate stepping up of heights above or below those stated and avoid abrupt transitions in building heights.</u></p>	To ensure that the Plan is in general conformity with the London Plan and consistent with national policy in terms of making effective use of land (NPPF section 11), and in respect of the use of design guides and codes (NPPF paragraphs 128 to 129)	No change to HRA findings. No 'likely significant effects'
MM86	204	Site Allocation Mo4, Approach to tall buildings	<p>This site will include tall buildings in appropriate locations subject to consideration of impacts on existing character, heritage and townscape as part of a plan-led approach, which could take the form of a masterplan, supplementary planning document or an outline planning application.</p> <p><u>The Merton Character Study 2021 and other supporting design evidence has informed the range of appropriate heights set out in Policy D12.6 'Tall Buildings' and the Strategic Heights Diagram for the Morden Regeneration Zone. However, appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code, which could be prepared either by applicants or the council. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account the guidance contained in the National Design Guide and the</u></p>	To ensure that the Plan is in general conformity with the London Plan and consistent with national policy in terms of making effective use of land (NPPF section 11), and in respect of the use of design guides and codes (NPPF paragraphs 128 to 129).	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>National Model Design Code. In the absence of a Design Guide or Design Code the National Design Guide and the National Model Design Code will be used to guide decisions on future applications.</u></p>		
MM87	206	Site Allocation Mo5, site map	<p>The developer will need to engage with TfL to provide suitable alternative bus stand and bus stop facilities. <u>Where appropriate, development proposals may be required to make financial contributions towards the delivery of these facilities, in the form of planning obligations.</u></p>	<p>To achieve consistency with national policy insofar as it requires plans to set out the contributions expected from development (paragraph 34 NPPF).</p>	<p>No change to HRA findings. No 'likely significant effects'</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM88	204	Site Allocation Mo4, Infrastructure Requirements	<p><i>New map with modified boundary</i></p>  <p>Contains OS data © Crown copyright [and database rights] (2023) OS (1000192450)</p>	To ensure that the Plan is effective.	No change to HRA findings. <i>No 'likely significant effects'</i>
MM89	207	Site Allocation Mo5, Infrastructure Requirements	<p><u>Development proposals will need to demonstrate that clinical capacity will be maintained for residents during the redevelopment of this site.</u></p>	To ensure that the Policy is justified and effective.	No change to HRA findings. <i>No 'likely significant effects'</i>
MM90	209	Site Allocation Mo6, move wording from Design and accessibility guidance to Infrastructure Requirements	<p><u>We will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. This site is an area identified as being deficient in access to public open space. We will require on site provision in accordance with the infrastructure policies and London Plan. The site is in an area</u></p>	To achieve consistency with national policy in terms of ensuring clarity (per paragraph 16 NPPF), in regard to the provision of safe	No change to HRA findings. <i>No 'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>identified as being deficient in access to children's play space for ages 5-11 years and 0-4 years.</u>	and accessible green infrastructure (per paragraph 92 NPPF).	
MM91	212	Site Allocation Mo7, move wording from Design and accessibility guidance to Infrastructure Requirements	<u>The site is in an area identified as being deficient in access to children's play space for ages 0-4 years. We will require on site playspace provision in accordance with the infrastructure policies and London Plan.</u>	To ensure that the Policy is clear and effective.	No change to HRA findings. No 'likely significant effects'
MM92	227-247	All Site Allocations: Infrastructure Requirements:	<i>Insert this sentence at the start of the 'Infrastructure Requirements' part of all Raynes Park Neighbourhood site allocations:</i> <u>Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</u>	To achieve consistency with national policy insofar as it requires plans to set out the contributions expected from development (paragraph 34 NPPF).	No change to HRA findings. No 'likely significant effects'
MM93	229	Site Allocation RP3, Infrastructure Requirements	...proposals to alleviate this deficiency in accordance with the Green Infrastructure policies. <u>Development proposal should aim to restore the Pyl Brook, with natural banks and buffer habitat to create a wide corridor, facilitating biodiversity net gain and providing a significant improvement to the green corridor.</u>	To ensure consistency with national policy insofar as it expects planning policies to contribute to and enhance the natural and local environment, by, amongst other things minimising impacts	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			This site is in an area identified as being deficient in access to public open space. The Council will...	on and providing net gains for biodiversity (paragraph 174 NPPF).	
MM94	230	Site Allocation RP2, Impacts on an ecology designation	Southern end of the site is near green corridors No	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM95	233	Site allocation RP3 Burlington Road, Approach to tall buildings	The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings. The site could include a range of tall buildings up to an appropriate upper limit of circa 52m (approx. 15 storeys). However, appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code, which could be prepared either by applicants or the council. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account the guidance contained in the National Design Guide and the National Model Design Code. In the absence of a Design Guide or Design Code the National Design Guide and the National Model Design Code will be used to guide decisions on future applications.	To ensure that the Plan is in general conformity with the London Plan and consistent with national policy in terms of making effective use of land (NPPF section 11), and in respect of the use of design guides and codes (NPPF paragraphs 128 to 129).	No change to HRA findings. No 'likely significant effects'
MM96	233	Site Allocation RP3, Infrastructure Requirements	Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure, but do not have concerns relating to the and wastewater network infrastructure.	To ensure that the Plan is effective and justified.	No change to HRA findings. No 'likely significant effects'
MM97	234	Site Allocation RP4 Bushey Road site allocation and deliverability	Site allocation: Commercial (including retail subject to the relevant tests being met), business and industrial uses where such uses are appropriate to a residential area. Long term this site has potential for residential-led mixed use development which could include with potential for ground and lower floors commercial, business, services and local community uses appropriate to a residential area.	To ensure the plan is effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			Site deliverability: <u>0-5</u> for commercial, business and industrial uses; <u>-10-15</u> years for mixed use residential.		
MM98	235	Site Allocation RP4, Design and accessibility guidance	Development proposals will need to incorporate suitable mitigation measures <u>to address the issues associated with the critical drainage area.</u>	To ensure that the Plan is justified and effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM99	236	Site Allocation RP4, Infrastructure Requirements	<u>Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.</u>	To ensure that the Plan is effective, and in the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM100	238	Site Allocation RP5, Infrastructure Requirements	This site is in an area identified as being deficient in access to public open space. The council will require <u>major development</u> proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site <u>where this</u>	To ensure that the allocation is justified.	No change to HRA findings. No <i>'likely significant effects'</i>

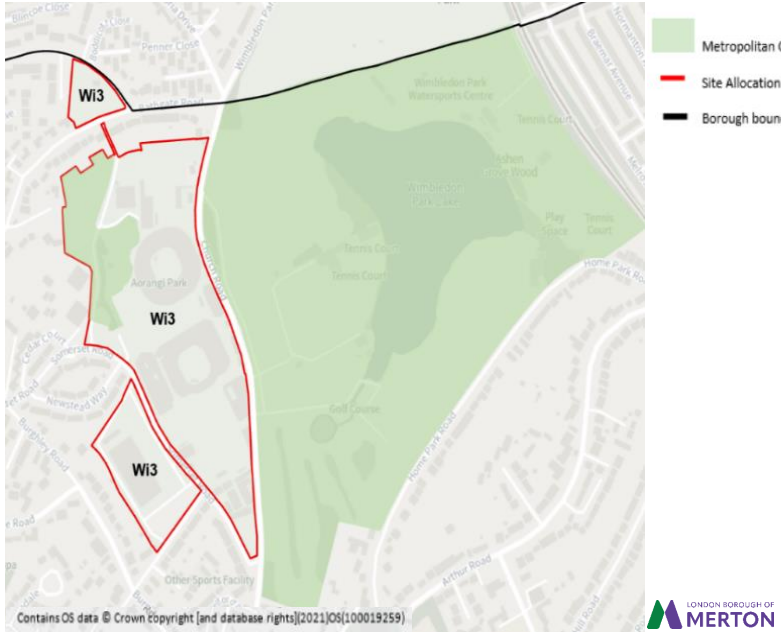
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			is suitable and viable , in accordance with the Green Infrastructure policies.		
MM101	255	South Wimbledon Policy N7.1, part c	Supporting developments and occupiers that help improve or strengthen local character, reflecting the area's rich architectural history or providing a modern interpretation <u>which respects heritage assets</u> ;	To achieve consistency with national policy in terms of setting out a positive strategy for the conservation and enjoyment of the historic environment (paragraph 190 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM102	255	South Wimbledon Policy N7.1, part d	Support developments <u>in the Local Centre</u> that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;	To ensure that the Policy is clear and effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM103	255	South Wimbledon Policy N7.1, part g	Protecting and enhancing the public open space at Nelson Gardens <u>and Haydons Road Recreation Ground</u> and improving links to Abbey Rec, Wandle Park and other nearby open spaces;	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM104	255	South Wimbledon Policy N7.1, part h	Support <u>well designed</u> development commensurate with the excellent public transport access of the area;	To ensure that the Plan is effective and consistent with national policy insofar as the achievement of well-designed places is concerned (per section 12 NPPF)	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM105	255	South Wimbledon Policy N7.1, part j	<u>Integrate</u> Work with the regeneration phases being delivered on the High Path estate over the next 10-15 years, guided by the Estates Local Plan <u>to ensure the development enhances the local environment</u> ; this includes the proposed public park at High Path;	To ensure that the Plan is effective and consistent with national planning policy insofar as it requires planning policies to consider the social, economic and environmental benefits of estate regeneration (paragraph 94 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM106	255	South Wimbledon Policy N7.1, part k	Supporting the redevelopment at South Wimbledon station (<u>Site Allocation Wi8</u>) which respects and enhances the Grade II listed building and <u>other heritage assets within the area, delivers a range of benefits including</u> encouraging a public space, <u>cycle parking, improved station facilities</u> and secondary pedestrian entrance to the underground station off the busy main roads.	In the interests of clarity and to ensure that the Plan is consistent with national policy relating to the conservation of heritage assets (section 16 NPPF) and that opportunities to promote walking, cycling and public transport are identified and pursued (paragraph 104(c) NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM107	267	Wimbledon: Policy N9.1, new part between (d) and (e.)	<u>Supporting tall buildings within Wimbledon Town Centre in accordance with the details in the Strategic Heights Diagram for Wimbledon Town Centre, and the requirements in Policy D12.6 Tall Buildings</u>	To ensure that the Plan is in general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'
MM108	268, 317	Wimbledon: Policy N9.1, part j.	Securing <u>improvements to public transport and</u> (AM159) 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.	To ensure that the Plan is effective and justified.	No change to HRA findings. No 'likely significant effects'
MM109	268	Wimbledon Policy N9.1, new part after j	<u>Creating a more pleasant environment for shopping and leisure activities 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>	To achieve consistency with national policy insofar as it expects planning policies: (i) to support the role that town centres play at the heart of local communities (paragraph 86 NPPF); and (ii) to aim to achieve healthy, inclusive and safe places (paragraph 92 NPPF).	No change to HRA findings. No 'likely significant effects'
MM110	269	Wimbledon Policy N9.1, q	Recognising the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road in <u>Wimbledon</u> and at Raynes Park to maintain its global position as	To ensure that the Plan is justified, effective and to ensure consistency with national policy	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>a world class sporting venue of national and international significance</u> the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally</p>	<p>insofar as it expects planning policies to help create the conditions in which businesses can invest, expand and adapt, with significant weight being placed on the need to support economic growth (paragraph 81 NPPF).</p>	
MM111	275	9.1.35	<p>We will support the continued upgrade and improvement of all AELTC's facilities to maintain its global position as <u>a world class sporting venue of national and international significance.</u> the premier Grand Slam as set out in more detail in site allocation W13.</p>	<p>To ensure that the Plan is justified, effective and to ensure consistency with national policy insofar as it expects planning policies to help create the conditions in which businesses can invest, expand and adapt, with significant weight being placed on the need to support economic growth (paragraph 81 NPPF).</p>	<p>No change to HRA findings. No 'likely significant effects'</p>
MM112	New chapter 8	New policy N8.1 Wimbledon Park	<p><i>Refer to Appendix 6 for new policy wording</i></p>	<p>To achieve an effective and justified policy, which is consistent with</p>	<p>Screened in No 'likely significant effects'</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
				national policy relating to the conservation of heritage assets (section 16 of NPPF) and the natural environment (section 15 NPPF), and to secure general conformity with the London Plan in respect of provisions relating to Metropolitan Open Land.	<i>Please refer to section 7.</i>
MM113	281, 288, 290, 299, 302, 305, 311, 314, 318	Site Allocation Wi2	<p>Approach to taller buildings. Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in <u>having regard to the Future Wimbledon SPD.</u> <u>The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the appropriate height for this site.</u></p> <p><u>All building heights will be subject to their impact on existing character, townscape and heritage in accordance with the chapter on Places and Spaces in a Growing Borough, and have regard to the Future Wimbledon SPD.</u></p>	To ensure the Plan is positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM114	282	Site Allocation Wi3	<p>(Replace site allocation map with the following:)</p> 	To ensure that the policy is justified and effective.	<p>No change to HRA findings.</p> <p>No 'likely significant effects'</p>
MM115	283	Site allocation Wi3	Amended as shown in Appendix 7 - now only including the existing AELTC site.	To ensure that the policy is justified and effective.	<p>No change to HRA findings.</p> <p>No 'likely significant effects'</p>
MM116	293	Site Allocation Wi7, Infrastructure requirements	<p>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. <u>Proposals will be required to explore the opportunity to improve pedestrian and cycle access between the Wandle Trail and Durnsford Recreation Ground, in accordance with the active travel policies.</u></p>	To ensure that opportunities to promote walking and cycling	<p>No change to HRA findings.</p> <p>No 'likely significant effects'</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM117	293	Site Allocation Wi7, Infrastructure Requirements bullet point 4	The site is adjacent to rail tracks used by the District South West Main line and land safeguarded for Crossrail2. Transport for London requires that London Underground Infrastructure Protection, Network Rail and the Crossrail2 team should must be fully consulted about any works or development proposals that may impact on rail infrastructure. The Council will need evidence that the developer has engaged with London Underground and Network Rail as part of a planning application.	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM118	293	Site Allocation Wi7, Infrastructure Requirements	<p><u>Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.</u></p> <p>Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</p>	To ensure effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM 119	307	Site Allocation Wi12, Design and accessibility guidance	Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain and with the critical drainage area to minimise flood risk for future occupiers and the potential for water pollution from the site. A flood risk assessment will be required as set out in the NPPF and should also have considered the treatment of the non-main rivers that pass through the site and incorporate sustainable drainage systems into development proposals.	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM120	308	Site Allocation Wi12, Approach to tall buildings	Development of the site could include taller buildings <u>(circa 36m, approx.10 storeys, could be appropriate), subject to their impact on existing character, townscape and heritage in accordance with the chapter on Places and Spaces in a Growing Borough, and taking into account the Council's Future Wimbledon SPD.</u>	To ensure general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>
MM121	308	Site Allocation Wi12, Infrastructure requirements	The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network. <u>This site is in close proximity to National Grid infrastructure 33Kv Underground Cable route Earlsfield Rail Feeders 427, 440 & 443 Section 3 and 33Kv Underground Cable route Wimbledon 33Kv D S/S Electrical Substation Wimbledon 132KV. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest</u>	To ensure that the Plan is effective.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.</u>		
MM122	317	Site Allocation Wi16, Existing uses	a mixture of town centre uses – retail, restaurants, financial and professional services and <u>ancillary</u> offices	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM123	317	Site Allocation Wi16, Site allocation	A mixture of <u>T</u> town <u>C</u> entre <u>T</u> ypes <u>U</u> ses such as community (including health <u>and wellbeing</u> /day centre), retail, restaurants and <u>cafes</u> take-away, financial and professional services, <u>leisure</u> , offices, hotel, residential <u>and last mile distribution</u> .	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM124	317	Site Allocation Wi16, Site deliverability	0-5 years <u>(phase 1) 5-10 years (phase 2)</u>	To ensure that the allocation is effective and justified.	No change to HRA findings. No <i>'likely significant effects'</i>
MM125	317	Site Allocation Wi16, Design and accessibility guidance:	The site provides an excellent opportunity for the <u>repurposing and</u> redevelopment of a substantial brownfield site within the heart of the town centre.	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM126	317	Site Allocation Wi16, Design and accessibility guidance	Development proposals must have regard to the design-led Future Wimbledon SPD (Supplementary Planning Document), <u>the Broadway Conservation Area design guide and design considerations relating to the two Grade II listed buildings on site.</u>	In the interests of effectiveness and to ensure that the Plan is consistent with national policy relating to the conservation of heritage assets (section 16 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM127	320	Policy HW10.1, part a	Working with strategic partners such as NHS (National Health Service) England, <u>as part of the Integrated</u> Care System and Merton's Health and Wellbeing Boards in <u>improving health and wellbeing</u> tackling health inequalities, public health safety (for example during pandemics and other health emergencies), promoting and encouraging healthy lifestyles and creating healthy	To ensure clarity. .	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			environments in Merton for all.		
MM128	321	New paragraphs after paragraph 10.1.5 (new paragraphs and heading)	<p><u>Health (including mental health) and wellbeing integrated approach</u> <u>The environment in which we live is a major determinant of human health and wellbeing. Town planning in Britain originated in a series of public health and housing reforms in the late 19th and early 20th century, focusing upon basic human living conditions. Today, the health and wellbeing agenda is much broader, with determinants considered to influence health and wellbeing encompassing the physical, social and economic environments.</u></p> <p><u>Merton Council has taken an integrated approach to health and wellbeing in the Local Plan and the expectation is for development to respond positively. Many measures set out in other parts of this local plan play a part in promoting health and wellbeing, seeking to address health inequalities; and must be addressed where appropriate.</u></p>	In the interests of clarity, to ensure that the Plan is effective, and to achieve consistency with national policy insofar as it expects planning policies to aim to achieve healthy places, and to take into account and support the delivery of local strategies to improve health for all sections of the community (paragraphs 92 to 93 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings												
			<table border="1"> <tr> <td data-bbox="658 209 1014 260"><u>Health (including mental health) and wellbeing issue.</u></td> <td data-bbox="1014 209 1368 260"><u>Related local plan policy</u></td> </tr> <tr> <td data-bbox="658 260 1014 371"><u>Healthy homes and quality</u></td> <td data-bbox="1014 260 1368 371"> <u>Strategic Policy No. H11.1 Housing choice</u> <u>Strategic Policy No. H11.2 Housing Provision</u> <u>Policy D12.3 Ensuring high quality design for all developments</u> </td> </tr> <tr> <td data-bbox="658 371 1014 483"><u>Access to healthcare services and other social infrastructure</u></td> <td data-bbox="1014 371 1368 483"> <u>Policy TC13.7 Protecting corner / local shops</u> <u>Strategic policy IN 14.1 Infrastructure</u> <u>Policy IN14.2 Social and Community Infrastructure</u> </td> </tr> <tr> <td data-bbox="658 483 1014 715"><u>Access to open space and nature</u></td> <td data-bbox="1014 483 1368 715"> <u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation</u> <u>Policy O15.2 Open Space and Green Infrastructure</u> <u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.4 Protection of Trees, Hedges and Other Landscape Features</u> <u>Policy O15.6 Wandle Valley Regional Park</u> </td> </tr> <tr> <td data-bbox="658 715 1014 818"><u>Air quality and environmental impacts</u></td> <td data-bbox="1014 715 1368 818"> <u>Policy D12.11 Basements and subterranean design</u> <u>Policy P15.10 Air Quality and Environmental Pollution</u> </td> </tr> <tr> <td data-bbox="658 818 1014 882"><u>Supporting walking and cycling</u></td> <td data-bbox="1014 818 1368 882"> <u>Policy IN14.3 Sport and Recreation</u> <u>Policy T16.2 Prioritising active travel choices</u> </td> </tr> </table>	<u>Health (including mental health) and wellbeing issue.</u>	<u>Related local plan policy</u>	<u>Healthy homes and quality</u>	<u>Strategic Policy No. H11.1 Housing choice</u> <u>Strategic Policy No. H11.2 Housing Provision</u> <u>Policy D12.3 Ensuring high quality design for all developments</u>	<u>Access to healthcare services and other social infrastructure</u>	<u>Policy TC13.7 Protecting corner / local shops</u> <u>Strategic policy IN 14.1 Infrastructure</u> <u>Policy IN14.2 Social and Community Infrastructure</u>	<u>Access to open space and nature</u>	<u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation</u> <u>Policy O15.2 Open Space and Green Infrastructure</u> <u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.4 Protection of Trees, Hedges and Other Landscape Features</u> <u>Policy O15.6 Wandle Valley Regional Park</u>	<u>Air quality and environmental impacts</u>	<u>Policy D12.11 Basements and subterranean design</u> <u>Policy P15.10 Air Quality and Environmental Pollution</u>	<u>Supporting walking and cycling</u>	<u>Policy IN14.3 Sport and Recreation</u> <u>Policy T16.2 Prioritising active travel choices</u>		
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			<u>shaping the conditions of daily life. A healthy place is one that can contribute to the prevention of ill health and provide the environmental conditions to support positive health and wellbeing.</u>		
MM129	321 509 517 After 583 After 665	Policy O15.4 name	<i>Change all references to the policy name throughout the document to:</i> <u>Protection of Trees, Hedges and Other Landscape Features</u>	To secure the effectiveness and clarity of the Plan.	No change to HRA findings. No 'likely significant effects'
MM130	326	10.1.24	<u>According to Merton's Strategic Housing Needs Assessment 2019 and based on population projections</u> the GLA (Greater London Authority) Population and Household Projections (2016), by 2030 <u>2035</u> the number of people aged over 75 <u>85</u> is predicted to increase by 41% <u>52%</u> in Merton.	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM131	328	New paragraph after 10.1.31	<u>Developers will be expected to demonstrate how they have incorporated dementia-friendly approaches in submitted planning applications and, where relevant, at Design Review Panel.</u>	To ensure that the Plan is justified, effective, and that its policies are clear and unambiguous (per NPPF paragraph 16).	No change to HRA findings. No 'likely significant effects'
MM132	329	Policy HW10.2	<p>a. We will require development proposals to:</p> <ul style="list-style-type: none"> i Contribute towards the health priorities of Merton Health and Wellbeing <u>Strategy</u> Board and partners to help reduce inequalities, including health, across Merton. ii Incorporate the Transport for London (TfL) Healthy Streets Approach as part of development proposals in accordance with the design, housing, environment, economy and other policies in this plan that address the wider determinants of health and improve quality of life. iii Encourage opportunities for food growing such as 	To ensure that the Policy is justified, effective and consistent with national policy through inclusion of policies that are unambiguous (paragraph 16 NPPF), and that local strategies to	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>allotments, community gardens and orchards and other innovative food growing spaces as part of development proposals.</p> <p>iv Incorporate Sport England and Public Health Active Design principles as part of development proposals.</p> <p>b. WeThe council will: Use the Healthy Streets Approach to prioritise health and wellbeing in planning decisions.</p> <p>c. <u>Require a HIA for the following:</u></p> <p>i Require all All developments in Merton of 100+ residential units or over 10,000m2 non-residential development to carry out a Health Impact Assessment (HIA).</p> <p>ii Require a HIA for developments Developments of over 50 homes or more in areas identified by the government's Ministry of Housing, Communities and Local Government (MHCLG) Indices of Deprivation located in an Index Multiple Deprivation decile 5 or less or identified in Merton's Joint Strategic Needs Assessment (JSNA) as an area of health priorities.</p> <p>iii <u>Where deemed necessary the cumulative impact of</u> proposed major development is in an area with two or more other major developments planned or started.</p> <p>iv Significant developments in areas of poor air quality, for example Air Quality Focus Areas</p> <p>v If 1 or more hot food takeaways are proposed as part of a development proposal.</p> <p>New educational, health facilities or publicly accessible open space are proposed.</p>	<p>improve health are taken into account and supported (paragraph 93 NPPF).</p>	
MM133	329	Policy HW10.2 part b, v. and 10.2.3	<p>v. c. c. In line with the London Plan and policy TC13.8 in this plan, not permit to manage and monitor proposals for new hot food takeaways found within 400 metres of the boundaries of a primary or secondary school to promote the availability of</p>	<p>To ensure that the Policy is justified and in general conformity</p>	<p>No change to HRA findings. No 'likely significant effects'</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>healthy food; where any development proposals involving hot food takeaways are permitted, the Council will require encourage the operator to achieve and operate in compliance with the Healthier Catering Commitment standard.</p> <p>10.2.3. We will look to create and promote healthy food environment in Merton by increasing the availability of healthy food and limiting unhealthy options. As such, and In line with Policy DM TC 13.8 7.11 when considering we will not permit new development proposals for fast food takeaways located 400 metres from the exit and entrance of an existing or proposed school. The council will have regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of hot food takeaway outlets and healthy eating initiatives taking place at the school.</p>	with the London Plan.	
MM134	330	New paragraph after para 10.2.1	<p><u>Merton's Health and Wellbeing Strategy</u> <u>Merton's Health and Wellbeing Strategy (2019-2024) has four main themes for Merton residents to <i>Start Well, Live Well and Age Well in a Healthy Place</i>. The strategy has a number of priorities for example:</u></p> <ul style="list-style-type: none"> • <u>Tackling health inequalities: especially the east/west health divide in the borough</u> • <u>Health in All Policies approach: maximising the positive health impacts across all policies and challenging negative impacts.</u> <p><u>All development proposals are encouraged to positively contribute to, and are not to detract from, the council's health priorities as set out in the Health and Wellbeing Strategy.</u></p>	To provide clarity and achieve consistency with national policy in this way (per paragraph 16 NPPF) and in respect of local strategies to improve health (paragraph 93 NPPF).	No change to HRA findings. No 'likely significant effects'
MM135	331	New paragraphs after 10.2.7	<p><u>Indices of Multiple Deprivation</u></p> <p><u>The Indices of Deprivation provide a set of relative measures</u></p>	To ensure that the policy is effective and justified.	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>of deprivation at a small local area level (Lower-layer Super Output Areas) across England, based on seven different domains, or facets, of deprivation:</u></p> <ul style="list-style-type: none"> • <u>Income</u> • <u>Employment</u> • <u>Education, Skills and Training</u> • <u>Health and Disability</u> • <u>Crime</u> • <u>Barriers to Housing and Services</u> • <u>Living Environment</u> <p><u>Combining information from the seven domains produces an overall relative measure of deprivation, the Index of Multiple Deprivation (IMD). The Index of Multiple Deprivation (IMD) ranks every small area in England from 1 (most deprived area) to 32,844 (least deprived area).</u></p> <p><u>Merton ranks as the 214th least deprived local authority district in terms of average IMD (2019) (out of a total of 317), and the 5th least deprived borough in London (out of a total of 32 boroughs). However, there are pocket of deprivation across Merton with more in the east of the borough. Developers are expected to refer to the government’s IMD reports mapping sources and demonstrate how the information has informed proposals by way of the HIA. To comply with policy HW10.2 (b)(iii) above, developments of 50 homes or more located in a IMD decile that is 5 or less must submit a Health Impact Assessment.</u></p> <p><u>Cumulative impact</u> <u>Proposed development within 800 metres of two or more other major developments planned or started may be required to carry out a HIA. This will depend on location, health and wellbeing needs and the wider determinates of health. HIAs must have regard to other development proposals planned or started and demonstrate that the cumulative impact is positive and will contribute to a healthy</u></p>		<p>No 'likely significant effects'</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>neighbourhood.</u>		
MM136	333, 346	H11.1	Strategic policy H11.1 Housing Choice	To comply with national policy (NPPF paragraphs 20 and 21) relating to the identification of strategic policies.	No change to HRA findings. No <i>'likely significant effects'</i>
MM137	333 333 334 334 334 335	Policy H11.1 Housing choice, part d. Policy H11.1 Housing choice part f Policy H11.1 Housing choice part g Policy H11.1 Housing choice part h Policy H11.1 Housing choice part i	<p><u>Provide step-free access and adapted housing in</u> accordance with London Plan Policy D7 (Accessible housing) and Building Regulation Requirement M4(2) <u>and M(4.3) and this Local Plan's policy D12.3 'Ensuring high quality designs in all developments'</u>, 90% of all new build housing is required to be 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings.</p> <p>We will <u>Expect</u> the following level of affordable housing (gross) to be provided on individual sites as follows:</p> <p><u>Require applicants to</u> Ddemonstrate that they have taken account of the strategic 50% target and have sought grant where required to increase the level of affordable housing beyond 35%.</p> <p><u>Require Applicants to</u> should present data for all housing tenures proposed in their scheme as a percentage of total residential provision in three ways: as the number of homes (units), habitable rooms, and floorspace.</p> <p>For schemes of 10 homes and above, <u>require</u> affordable housing is required to be provided on-site.</p> <p><u>Require A</u>ll affordable housing provided by the scheme must <u>to</u> be affordable in perpetuity and secured via planning obligation (Section 106 agreement or appropriate legal deed).</p>	To ensure that the Plan is justified and effective and in the interests of clarity.	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
		Policy H11.1 Housing choice part j			
MM138	334	Policy H11.1 Housing choice, part f. Table	Affordable housing level Threshold level to be eligible for the Fast-Track Route as set out in the London Plan provided all provision <u>accords with the tenure mix requirements of Strategic Policy H11.1 and</u> is on-site without public subsidy:	To secure general conformity with the London Plan and in the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM139	334	Policy H11.1 Housing choice, part f. Table	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 with national policy on First Homes as expressed in the 'Affordable Homes Update' Written Ministerial Statement (WMS) of 24 May 2021)	No change to HRA findings. No <i>'likely significant effects'</i>
MM140	334	Policy H11.1 Housing choice, part f. Table	Only in exceptional circumstances will the provision of affordable housing off-site or financial contribution in lieu of provision on-site be considered by the council, and this must be justified, and such schemes will be required to provide a detailed viability assessment <u>and contribute to the objective of creating mixed and balanced communities.</u>	To be consistent with national policy (paragraph 63 of the NPPF) and to secure general conformity with the London Plan	No change to HRA findings. No <i>'likely significant effects'</i>
MM141	334	Policy H11.1, part i	For schemes of 10 homes and above, <u>require</u> affordable housing is required to be provided on-site. In exceptional circumstances, where the applicant has robustly demonstrated to the council that on-site provision is not feasible, we may consider a financial contribution equivalent. This justification must include the provision of a detailed financial appraisal. For these schemes, off-site and cash in lieu schemes must accord with the requirements set out in The London Plan and <u>have regard to</u> the Mayor's	To ensure that the Plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these		
MM142	339	Figure 11.1.3	Figure 4– 11 .1.3 Affordable housing home ownership prices (aligned with the cost of accessing private rented sector) – data for the year to March 2018)	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM143	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 11.1.3 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 secure consistency with national policy expressed in the 'Affordable Homes Update' WMS.	No change to HRA findings. No <i>'likely significant effects'</i>
MM144	339	Paragraph 11.1.14	First Homes are a form of discounted market sales housing and to be considered as such must meet the requirements set out in the MHCLG Ministerial Statement published on 24th May 2021 Written statements - Written questions, answers and statements - UK Parliament and the definition and eligibility requirements set out in NPPG Guidance https://www.gov.uk/guidance/first-homes . <u>These national policies and guidance, in addition to paragraph 64 of the National Planning Policy Framework also set out specific exceptions to the general requirements for First Homes and low-cost home ownership dwellings which we will have regard to as appropriate in the determination of submitted planning applications.</u>	To secure consistency with national policy in terms of affordable housing provision and clarity (paragraph 16 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM145	339	Paragraph 11.1.14	First Homes are an intermediate tenure therefore in accordance with government requirements, proposals for new homes will be considered against the intermediate tenure split element of Policy H11.1(Housing Choice). <u>On schemes where policy-compliant provision of First Homes does not result in 10% of the overall housing yield of the site being available for affordable home ownership, any shortfall in this respect would need to be made up from the rest of the intermediate contribution before</u>	To secure compliance with national policy on First Homes as expressed in the 'Affordable Homes Update' WMS.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>other types of intermediate affordable housing would be considered.</u>		
MM146	341	New Paragraph after 11.1.18	<p><u>Merton's SHNA identifies a notable and pressing need for affordable housing in all parts of Merton for between 878 to 1,084 affordable homes per year and that the demand for affordable housing significantly outstrips supply. Merton's Local Plan Viability Study (2020) notes that where viability is already on the margins, other policy requirements may need to be reduced to compensate for these costs. In such instances Policy IN14.1 (Infrastructure) would apply, which in accordance with London Plan Policy DF1 requires that where it has been demonstrated that planning obligations cannot viably be supported, priority should be given to affordable housing and necessary public transport improvements.</u></p> <p><u>Where the developer contends the policy requirements in relation to viability of a particular proposal, the onus would lie with the developer to demonstrate what can viably be achieved through the submission of a viability assessment. We may seek payments from applicants for the cost of independent viability assessment(s).</u></p>	To ensure the Plan is justified, in general conformity with the London Plan and clear.	No change to HRA findings. No <i>'likely significant effects'</i>
MM147	341	Paragraph 11.1.19	Only in exceptional circumstances for schemes proposing 10 or more homes (gross) will the provision of affordable housing off-site or as a financial contribution in lieu of provision on site be considered subject to demonstrating to our satisfaction that this exception is justified, <u>and such schemes should contribute to the objective of creating mixed and balanced communities and accord with the London Plan supporting paragraphs 4.4.9 to 4.4.13 (inclusive).</u>	To ensure consistency with national policy (paragraph 63 NPPF) and general conformity with the London Plan November 2022: See above MM1 on page 2	No change to HRA findings. No <i>'likely significant effects'</i>
MM148	341	Paragraph 11.1.20	All s <u>S</u> chemes which propose off-site affordable housing or cash in lieu payments are required to provide a detailed viability assessment as part of the justification that these proposals are	In the interests of clarity and to secure effectiveness.	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>acceptable, in accordance with London Plan and Merton’s Local Plan policies. <u>Following adoption of this Plan, we will publish guidance to assist in the delivery of affordable housing requirements set out in Strategic Policy H11.1 for schemes of 2 to 9 units, including how development appraisals or other methods agreed in writing with the Council will be used in calculating financial contributions for these schemes.</u></p>		<p>No ‘likely significant effects’</p>
MM149	341	Paragraph 11.1.22	<p>Affordable housing monetary contributions in lieu of on-site provision will be calculated on a case-by-case basis according to the following formula:</p> <p>A-B=C</p> <p>Where:</p> <p>A= <u>residual</u> value of the proposed development assuming 100% of the residential homes are provided as private housing <u>established through a development appraisal or other method agreed in writing with the Council.</u></p> <p>B= the <u>residual</u> value that would otherwise have been achieved by the proposed development incorporating affordable housing in accordance with the affordable housing policy requirement <u>established through a development appraisal or other method agreed in writing with the Council.</u></p> <p>C= payment in lieu</p>	<p>To ensure that the Plan is clear, effective and justified.</p>	<p>No change to HRA findings. No ‘likely significant effects’</p>
MM150	345	New paragraph below 11.1.38	<p><u>Estate regeneration that involves the loss and replacement of affordable housing should deliver an uplift in the quantity and quality of affordable housing wherever possible. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.</u></p>	<p>To ensure that the Plan is effective and to achieve consistency with national policy insofar as it requires</p>	<p>No change to HRA findings. No ‘likely significant effects’</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
				the type and tenure of housing needed for different groups in society to be reflected in planning policies (paragraph 62 of the Framework), and that estate regeneration should be delivered to a high standard, with its social benefits considered in planning policies (paragraph 94 NPPF).	
MM151	345	New paragraph below 11.1.38	<p><u>Securing M4(2) and M4(3) dwellings</u></p> <p><u>There may be site specific factors and viability issues which may warrant flexibility in the application of the accessible housing standards M4(2) and M4(3) requirements set out in Policy 11.1(d) for specific developments. The council will have regard to the exceptional circumstances detailed in PPG (Housing for Older and Disabled People); Government Housing: optional technical standards and paragraph 3.7.6 of the London Plan or subsequent updates to these in determining where the application of flexibility is warranted.</u></p>	To ensure that the Plan is consistent with national policy relating to optional technical standards (paragraph 130(f) fn49 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM152	345	New paragraph below 11.1.38	<p><u>M4(2) and M4(3) dwellings should be secured via planning conditions to allow the Building Control body to check compliance of a development against the optional Building Regulations standards.</u></p>	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings																																						
MM153	346	Policy H11.2	<p>We will aim to deliver a minimum of 11,732 12,084 additional homes for the period 2021/22 - 2035/36 2037/38 via a stepped target, set out as follows:</p> <table border="1" data-bbox="658 344 1249 1107"> <thead> <tr> <th data-bbox="658 344 954 389">Year</th> <th data-bbox="954 344 1249 389">Target</th> </tr> </thead> <tbody> <tr><td data-bbox="658 389 954 427">2021/22</td><td data-bbox="954 389 1249 427">918</td></tr> <tr><td data-bbox="658 427 954 466">2022/23</td><td data-bbox="954 427 1249 466">500</td></tr> <tr><td data-bbox="658 466 954 504">2023/24</td><td data-bbox="954 466 1249 504">450</td></tr> <tr><td data-bbox="658 504 954 542">2024/25</td><td data-bbox="954 504 1249 542">750</td></tr> <tr><td data-bbox="658 542 954 580">2025/26</td><td data-bbox="954 542 1249 580">750</td></tr> <tr><td data-bbox="658 580 954 619">2026/27</td><td data-bbox="954 580 1249 619">775</td></tr> <tr><td data-bbox="658 619 954 657">2027/28</td><td data-bbox="954 619 1249 657">775</td></tr> <tr><td data-bbox="658 657 954 695">2028/29</td><td data-bbox="954 657 1249 695">820</td></tr> <tr><td data-bbox="658 695 954 734">2029/30</td><td data-bbox="954 695 1249 734">1100</td></tr> <tr><td data-bbox="658 734 954 772">2030/31</td><td data-bbox="954 734 1249 772">1100</td></tr> <tr><td data-bbox="658 772 954 810">2031/32</td><td data-bbox="954 772 1249 810">780</td></tr> <tr><td data-bbox="658 810 954 849">2032/33</td><td data-bbox="954 810 1249 849">700</td></tr> <tr><td data-bbox="658 849 954 887">2033/34</td><td data-bbox="954 849 1249 887">474</td></tr> <tr><td data-bbox="658 887 954 925">2034/35</td><td data-bbox="954 887 1249 925">548</td></tr> <tr><td data-bbox="658 925 954 963">2035/36</td><td data-bbox="954 925 1249 963">548</td></tr> <tr><td data-bbox="658 963 954 1002">2036/37</td><td data-bbox="954 963 1249 1002">548</td></tr> <tr><td data-bbox="658 1002 954 1040">2037/38</td><td data-bbox="954 1002 1249 1040">548</td></tr> <tr><td data-bbox="658 1040 954 1107">Total</td><td data-bbox="954 1040 1249 1107">12,084</td></tr> </tbody> </table>	Year	Target	2021/22	918	2022/23	500	2023/24	450	2024/25	750	2025/26	750	2026/27	775	2027/28	775	2028/29	820	2029/30	1100	2030/31	1100	2031/32	780	2032/33	700	2033/34	474	2034/35	548	2035/36	548	2036/37	548	2037/38	548	Total	12,084	To ensure that the Plan is justified, effective and positively prepared in terms of seeking to meet housing requirements over the plan period, with appropriate buffers to achieve consistency with national policy (paragraph 74 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
Year	Target																																										
2021/22	918																																										
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Total	12,084																																										
MM154	346	Policy H11.2(e)	<p>Supporting the redevelopment of poor quality existing housing and proposals to improve the quality of existing homes (MM15) that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of permanent housing to non-permanent accommodation, such as temporary sleeping accommodation, on a permanent basis for a cumulative period of more than 90 days a year.</p>	To ensure clarity and effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>																																						

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM155	347	11.2.1	<p>We will encourage housing in sustainable brownfield locations. The 11,732 12,084 additional homes for the period 2021/22–2035/36 - 2037/38 will come forward in Merton by:</p> <ul style="list-style-type: none"> • Bringing forward housing capacity through regeneration, including Morden town centre and the Merton Opportunity Area. • Prioritising the development of previously developed land and ensuring it is used efficiently. • Development of sites identified in Merton's Housing Trajectory. • Development of windfall sites. • <u>Intensification of housing as part of estate regeneration proposals.</u> <p>...</p>	To ensure the Plan is justified, positively prepared, consistent with national policy in terms of making effective use of land (section 11 NPPF) and insofar as the consideration of the benefits estate regeneration are concerned (paragraph 94 NPPF), and in general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>
MM156	347	new paragraph below 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 2037/38 increases to 548 homes per annum.</u>	To ensure that the Plan is positively prepared, consistent with national policy relating to the coverage of strategic policies (section 3 NPPF), and is in general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>
MM157	348	11.2.4	London Plan paragraph 4.1.11 states that if a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings which cover the period to 2041 and any local evidence of identified capacity, <u>in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport</u>	To ensure that the Plan is justified and in general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>infrastructure improvements</u>, and roll forward the housing capacity assumptions applied in the London Plan for small sites. Figure <u>11.2.1</u> sets out Merton's Housing Trajectory.</p> <p><u>Merton supports high quality development, which meets identified needs. Merton faces constrained supply as it is characterised by a very large number of small sites and green spaces. These characteristics are replicated in several of the surrounding and adjacent boroughs.</u></p> <p><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 2037/38 increases to 548 homes per annum.</u></p> <p><u>Merton can confirm that there are no committed transport infrastructure improvements which can be considered to provide additional capacity for new homes beyond 2028/2029 as per Merton's Infrastructure Needs Assessment 2021 and Transport for London's representations on Merton's Local Plan. Merton will continue to work proactively and collaboratively with the Mayor in contributing to addressing much needed additional homes for London.</u></p>		
MM158	349	11.2.6	<p>.....stepped housing delivery target is appropriate in Merton as there is a significant uplift in the level of housing target between emerging and previous policies, and several large sites will be delivered in phases. <u>The estate regeneration programme of Eastfields, High Path and Ravensbury estates proposes the building of over 3,200 new homes, providing more than 2,000 additional homes from 2020-2037. Approximately 1,180 homes will be demolished as part of the estates regeneration programme, of which 748 demolitions will occur between 2019/20 and 2028/29.</u></p>	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM159	348	11.2.7 and Figure	As Figure 4.2.2 below indicates Merton's annual housing target will	To ensure that the	No change to HRA

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings																														
		11.2.2 (was fig 4.2.2)	<p>be set at 775 homes per annum for the period 2021/22 – 2023/24, and then increase to 1,080 for the period 2024/25 – 2026/27, then further increase to 1,350 for the period 2027/28 – 2028/29.</p> <table border="1"> <thead> <tr> <th></th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Merton Local Plan target</td> <td>775</td> <td>775</td> <td>775</td> <td>1,080</td> <td>1,080</td> <td>1,080</td> <td>1,350</td> <td>1,350</td> <td>8265</td> </tr> <tr> <td>London Plan target (including backlog)</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>1,033</td> <td>8265</td> </tr> </tbody> </table>		2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total	Merton Local Plan target	775	775	775	1,080	1,080	1,080	1,350	1,350	8265	London Plan target (including backlog)	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	8265	Plan is consistent with national policy relating to housing requirements (paragraph 66 NPPF), in line with the relevant advice given in Planning Practice Guidance 'Housing Supply and Delivery'.	findings. No 'likely significant effects'
	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total																										
Merton Local Plan target	775	775	775	1,080	1,080	1,080	1,350	1,350	8265																										
London Plan target (including backlog)	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	8265																										
MM160	348	11.2.8	<p>In accordance with London Plan paragraph 4.1.11, Merton's target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings. This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to 2035/36 of 1,096 as indicated in the following table:</p> <table border="1"> <thead> <tr> <th>Plan period</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>2029/30 – 2033/34</td> <td>2,370</td> </tr> <tr> <td>2034/35 – 2035/36</td> <td>1,096</td> </tr> <tr> <td>2029/30 – 2035/36</td> <td>3,466</td> </tr> </tbody> </table>	Plan period	Target	2029/30 – 2033/34	2,370	2034/35 – 2035/36	1,096	2029/30 – 2035/36	3,466	To ensure that the Plan is consistent with national policy relating to housing requirements (paragraph 66 NPPF), in line with the relevant advice given in Planning Practice Guidance 'Housing Supply and Delivery'.	No change to HRA findings. No 'likely significant effects'																						
Plan period	Target																																		
2029/30 – 2033/34	2,370																																		
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MM161	349	Figure 11.2.1 (was Fig 4.2.1)	<p><i>Figure 11.2.1 'Merton Housing Trajectory 2021/22 – 2037/38' updated – refer to Appendix 1</i></p>	To ensure the Plan is positively prepared and consistent with national policy in terms of the coverage of strategic policies (Section 3 NPPF), and that a trajectory illustrating the expected rate of housing delivery	No change to HRA findings. No 'likely significant effects'																														

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				should be included in plans (paragraph 74 NPPF)																													
MM162	350	11.2.9	Merton's housing trajectory is supported by Merton's Housing Delivery Test Action Plan which includes details on the actions we can take <u>in the event of under delivery</u> to increase the rate and number of homes built in Merton. <u>These actions include proactive engagement with developers, registered providers and delivery partners to investigate housing delivery constraints and investigation on whether the use of our Compulsory Purchase Orders should be considered as a measure to unlock stalled housing sites.</u> The delivery of sites will be monitored in Merton's Authority Monitoring Report (AMR) and Merton's Housing Delivery Test Action Plan.	To ensure that the Plan is positively prepared and effective.	No change to HRA findings. No <i>'likely significant effects'</i>																												
MM163	351	Figure 11.2.2 (formerly titled Figure 11.2.3)	<p>Delivery of new homes on identified sites in each neighbourhood 2021/22-2037/38</p> <table border="1"> <caption>Net gain in new homes by neighborhood and local plan period</caption> <thead> <tr> <th>Local Plan period</th> <th>Colliers Wood</th> <th>Mitcham</th> <th>Morden</th> <th>Raynes Park</th> <th>South Wimbledon</th> <th>Wimbledon</th> </tr> </thead> <tbody> <tr> <td>Years 0-5</td> <td>380</td> <td>680</td> <td>100</td> <td>720</td> <td>320</td> <td>1380</td> </tr> <tr> <td>Years 5-10</td> <td>300</td> <td>1700</td> <td>820</td> <td>280</td> <td>720</td> <td>250</td> </tr> <tr> <td>Years 10-17</td> <td>220</td> <td>920</td> <td>1480</td> <td>850</td> <td>920</td> <td>150</td> </tr> </tbody> </table>	Local Plan period	Colliers Wood	Mitcham	Morden	Raynes Park	South Wimbledon	Wimbledon	Years 0-5	380	680	100	720	320	1380	Years 5-10	300	1700	820	280	720	250	Years 10-17	220	920	1480	850	920	150	To ensure the Plan is consistent with national policy in terms of the coverage of strategic policies (section 3 NPPF)	No change to HRA findings. No <i>'likely significant effects'</i>
Local Plan period	Colliers Wood	Mitcham	Morden	Raynes Park	South Wimbledon	Wimbledon																											
Years 0-5	380	680	100	720	320	1380																											
Years 5-10	300	1700	820	280	720	250																											
Years 10-17	220	920	1480	850	920	150																											
MM164	352	11.2.19	<u>In accordance with London Plan Policy H9 (ensuring the best use of stock), boroughs are required to take account of the impact on housing stock and local housing need in</u>	To ensure that the Plan is justified, effective and in	No change to HRA findings.																												

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>considering applications for changes of use from permanent homes to non-permanent homes. Paragraph 4.9.3 of the London Plan states that it is unlawful for homes in greater London to be used as short-term holiday rented accommodation for a cumulative period of more than 90 days a year without seeking planning permission.</u> Due to the overwhelming need for permanent homes <u>and the limited availability of suitable sites to address this need</u> compared to temporary accommodation, we do not support <u>the change of use of permanent homes to non-permanent accommodation (such as temporary sleeping accommodation and short term rental residential accommodation) (either purpose built or converted) such as apart-hotels on sites that are suitable for permanent housing</u> <u>for a cumulative period of more than 90 days a year without seeking planning permission. In accordance with the Greater London (General Powers) Act 1973 (as amended), the use of residential premises in London as temporary sleeping accommodation involves a material change of use requiring planning permission, unless it benefits from the exceptions introduced by the Deregulation Act 2015 which sets out the conditions which need to be met including that the sum of (a) the number of nights of use and (b) the number of nights of any previous use of the same premises as temporary sleeping accommodation in the same calendar year, does not exceed 90 nights. Strategic Policy H11.2 protects existing permanent homes from change of use to non-permanent accommodation (including timeshare, short-term lets, and temporary sleeping accommodation, as well as C1 uses which include hotels, guest houses and boarding houses, and hostels and bed and breakfast premises). Demand for non-permanent accommodation in the borough should be met from appropriate sites in non-residential use, rather than sites used for permanent housing.</u></p>	<p>general conformity with the London Plan.</p>	<p>No 'likely significant effects'</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM165	353	11.2.22	As supported by the London Plan, Houses in Multiple Occupation (HMOs) contribute towards addressing needs. As with all homes, HMOs will be expected to meet good high standards of amenity both for the occupiers and neighbours and we will have regard to relevant guidance in the assessment of HMOs including national guidance, the London Housing Design Standards, the GLA Housing Supplementary Planning Guidance.	To ensure that the Plan complies with national policy (paragraph 130 (f) NPPF)	No change to HRA findings. No <i>'likely significant effects'</i>
MM166	355	11.3.1	<u>Policy H11.3 applies to all residential development proposals, irrespective of tenure type, for self-contained purpose-built flats, maisonettes, and houses.</u> Research in London and in Merton shows that there is an overwhelming need in London and in Merton for all types and sizes of new homes. Like much of London overcrowding exist in Merton which need to be eliminated.	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM167	355	11.3.3	Merton's SHNA sets out the size of housing required by tenure.	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM168	355	Figure 4.3.1	Size of housing required 2017 - 2035 by tenure.	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM169	355	11.3.5	In the affordable sector it is recognised the role which delivery of family sized homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM170	355	11.3.9	This mix is informed by a number of factors, including, local housing needs research deliverability, viability, affordability, land availability and data concerning waiting lists.	To ensure clarity and that the Plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM171	356	11.3.11	Gated development may address security concerns; however, they restrict public access and therefore, choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion.	To ensure that the Plan is effective and justified.	No change to HRA findings. No 'likely significant effects'
MM172	356	11.5.3	Continued demand for family sized housing can be expected from newly forming households.	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM173	357, 359, 360	Policy 11.4 (a) (i) and (vii)	<p>a. The suitability of proposals for supported care housing will be assessed having regard to the following criteria:</p> <p>i. Demonstrable need Meeting an identified local need.</p> <p>...</p> <p>vii. The quality of accommodation complies with all relevant standards for that use.</p>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM174	361, 363, 364, 365	Policy H11.5 title and part-a, i.-xi.	<p>Student Housing, other housing with shared facilities <u>such as HMOs and bedsits</u></p> <p>a. The development of student housing, other housing with shared facilities such as HMOs and bedsits is supported provided that the development:</p> <p>i. will not involve the loss of permanent housing-;</p> <p>ii. will not compromise capacity to meet the supply of land for additional self-contained homes-;</p> <p>iii. meets an identified local need-;</p>	To ensure that the Plan is justified, effective, clear and consistent with national policy.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>iv. is well designed and positively contributes to residential character and amenity, <u>with a high standard of amenity for existing and future users in accordance with NPPF paragraph 130(f)</u>;</p> <p>v. complies with all relevant standards for that use; and,</p> <p>vi. <u>and</u> is fully integrated into the residential surroundings.</p> <p>Additionally, with regards to student housing:-</p> <p>vii. caters for recognised educational establishments <u>is supported by evidence of a linkage with one or more higher education providers (HEP) in Merton or within a reasonable travelling distance of Merton. This evidence must include confirmation that the proposed rental levels for the student accommodation are supported by the linked HEP(s) and that the majority of the bedrooms in the development including all of the affordable student accommodation will be secured through a nominations agreement for occupation by students of one or more HEP, for the lifetime of the scheme, as required by London Plan policy H15;</u></p> <p>viii. provides purpose built dedicated floorspace that is managed for cultural or arts studios or activities.</p> <p>ix. during term-time, it is available exclusively to students-;</p> <p>x. includes a range of layouts including those with shared facilities- ;</p> <p>xi. is located in an area well served by public transport <u>links with the concerning higher education providers (HEP) recognised higher educational establishment it that the student housing</u> serves-;</p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM175	362	H11.5(a) (xiii)	<p>has an ownership <u>operated directly by a higher education provider or has a management arrangement in place from its initial occupation</u> secured <u>in accordance with London Plan Policy H15</u> by legal <u>nomination</u> agreement in place with the recognised higher educational establishment <u>one or more higher education providers (HEP)</u> it <u>, which the student housing serves; and,</u></p>	To secure general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>
MM176	362	Policy H11.5 part b and c	<p>b. We will resist development which results in the net loss of student housing and other housing with shared facilities <u>such as HMOs</u> and bedsits unless either it can be demonstrated that:</p> <ul style="list-style-type: none"> i. there is a surplus of the existing accommodation in the area; or, ii. the existing accommodation is incapable of meeting relevant standards for accommodation of this type- <u>or,</u> <p><u>the proposed development would provide permanent residential accommodation.</u></p> <p>c. Where we are satisfied that the development resulting in the net loss of student housing, other housing with shared facilities <u>such as HMOs</u> or bedsits, is justified, we will require that an equivalent amount of residential floorspace or permanent self-contained housing in Use Class C3 to be provided and these proposals will be considered in respect to Strategic Policy H11.1 Housing Choice.</p>	To ensure that the Policy is clear and justified.	No change to HRA findings. No <i>'likely significant effects'</i>
MM177	363	11.5.2	<p>A recognised higher educational establishment generally refers to those funded by the Higher Education Funding Council for England (HEFC). <u>Students' place of study linked with one or more higher education providers (HEP) include</u> Wimbledon College of Art, Wimbledon <u>which</u> is found <u>located</u> within Merton. Additionally, there are several higher education establishments</p>	To ensure general conformity with the London Plan and that the Plan is clear.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>others</u> found wholly or partly within neighbouring south London boroughs which are Kingston University, Roehampton University, St George's Medical School and St Mary's University College Twickenham. <u>Requiring proposals for student accommodation to have ownership or management agreements in place with students' place of study linked with one or more higher education providers (HEP) helps demonstrate there is a need for the proposal and ensure that it supports London Higher Education Providers (HEPs) as defined in London Plan footnote 77.</u></p>		
MM178	363	11.5.6	<p>There is an overwhelming need to provide additional conventional housing in Merton. It is considered that set within this challenging context, the requirement for student accommodation to caters for <u>students' place of study linked with one or more higher education providers (HEP)</u> recognised educational establishments within Merton or neighbouring south London boroughs of Croydon, Lambeth, Kingston-upon-Thames, Richmond, Sutton and Wandsworth strikes a suitable balance towards meeting the Mayor's strategic and local requirements for student housing, whilst minimising the compromise on Merton's capacity for conventional homes.</p>	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM179	363	New paragraph below para 11.5.6	<p><u>When considering whether a proposal for student accommodation would compromise capacity to meet the need for conventional dwellings in the borough the council will have regard to the following factors:</u></p> <ol style="list-style-type: none"> 1. <u>whether the proposal would displace C3 residential accommodation;</u> 2. <u>whether the proposal site has been allocated for housing;</u> 	To ensure that the Plan is effective and clear.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>3. <u>whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having capacity for conventional housing or</u></p> <p>- <u>has an extant or historic planning permission for C3 housing.</u></p>		
MM180	363	New paragraph below para 11.5.6	<u>We consider the most appropriate sites for student accommodation proposals to be well connected locations with good levels of access to public transport (PTAL 4 or higher) including those supported by good walking and cycling infrastructure and where student residents have access to a wide range of services and facilities within a 15-minute walking distance. Such proposals are also supported where the development is capable of having good access to public transport and facilities as a result of proposed transport improvements. It is considered that applicants should give priority during the site selection process to locations in proximity to the institutions that the development will serve.</u>	To ensure clarity and effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>
MM181	364	11.5.8	In line with the London Plan, we will resist the loss of permanent self-contained homes including its loss from conversion to short-stay accommodation intended for occupation for periods of less than 90 days.	To avoid unnecessary duplication and thus achieve consistency with national policy (paragraph 16 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM182	365	11.5.12	Student housing developments will also be expected to provide adequate floorspace, usually on the ground floor of the development, which has favourable management terms for cultural or arts studios or other activities. Wimbledon School of Art is Merton's only third-level education provider, affiliated to the University of the Arts, London. We will encourage developer to	To ensure that the Plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>

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			work with specialist organisations that rent and manage floorspace dedicated arts and cultural activities.		
MM183	366	Policy H11.6 e	<p>Policy No. H11.6 Accommodation for Gypsies and Travellers</p> <p><u>Assessment of Need:</u></p> <p><u>Following adoption of this Local Plan, the council will, as a priority, produce an updated assessment of the need for traveller accommodation using the up-to-date definitions for planning purposes included in the National Planning Policy for Traveller Sites. This assessment may be produced with other local planning authorities and/or the Mayor of London.</u></p> <p><u>The assessment is to be completed before or during 2025. Should any accommodation needs be identified, this may trigger the need to review this aspect of the Local Plan to inform whether any updates to it would be necessary.</u></p> <p>Assessment of Proposals:</p> <p>Existing legally established Gypsy and Traveller accommodation traveller sites will be retained and protected from redevelopment except where the same number of pitches is provided on an alternative site in the borough.</p>	To ensure that the Plan is effective.	<p>No change to HRA findings.</p> <p>To secure consistency with national policy set out in the Planning Policy for Traveller sites and to ensure that the Plan is positively prepared. The modification will also ensure that the Plan achieves consistency with national policy insofar as it requires changing circumstances affecting an area to be taken into account in plan reviews (per paragraph 34 NPPF). The modification ensures that the policy is effective in terms of the approach to flood risk.</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>Proposals for additional, alternative or new traveller sites will be assessed having regard to the following criteria:</p> <ul style="list-style-type: none"> a) The provision of on-site landscaping, which seeks to enhance the amenity of the site and which facilitates the integration of the site with the surrounding environment and amenity of occupiers of adjoining land. b) Access, proximity to a main road, parking and area to allow turning and manoeuvring. c) Proximity to shops, schools, health services and other community facilities. d) Provision of appropriate on-site facilities such as children's play facilities. 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> 		No 'likely significant effects'
MM184	366	Policy H11.6 f	The need or demand for accommodation provision and the available capacity on existing sites in the borough.	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM185	366	Policy H11.6, new criterion	<u>The provision of a high standard of amenity for future occupants of traveller 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 secure effectiveness and consistency with national policy (Planning Policy for Traveller Sites and paragraph 130 NPPF).	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM186	368	11.6.6	<p><u>Whilst</u> As a result, the implications for the 2019 Study findings <u>identified</u> regarding the need for 6 additional pitches in Merton <u>neither the 2021 London Plan or PPTS requires specific allocations to be made to meet this need. are no longer valid. Policy H11.6 applies to all Gypsies and Travellers regardless of whether they meet the PPTS definition.</u></p> <p>As a result, the implications for The 2019 Study findings <u>identified</u> regarding the need for 6 additional pitches in Merton, <u>which were assessed to fall outside of the planning definition of travellers included in the version of PPTS in place at the time of its publication. However, the government made changes to the planning definition of these terms in December 2023, and as a result, the needs assessment will now need to be updated to take this into account. In line with Policy H11.6, the production of an up-to-date assessment will be a priority action for the Council and will inform monitoring and review activity of the Plan in line Policy M17.1 and the NPPF (paragraph 33). are no longer valid. In advance of the production of a refreshed needs assessment, and in the context of the needs identified in the 2019 GTAA, Policy H11.6 provides a positively prepared basis for the assessment of proposals,</u> and applies to all travellers regardless of whether they meet the PPTS definition or not.</p>	In the interests of clarity and to ensure that the Plan accords with the national policy (in particular paragraph 62 NPPF) insofar as it requires the type of housing needed for different groups in the community to be assessed and reflected in planning policies	<p>No change to HRA findings. No <i>'likely significant effects'</i></p> <p>Screened out.</p> <p>In the interests of clarity and to ensure that the Plan accords with the national policy (in particular paragraph 62 NPPF) insofar as it requires the type of housing needed for different groups in the community to be assessed and reflected in planning policies.</p>
MM187	368	New supporting para following existing para 11.6.6	<u>The extent of provision of appropriate on-site facilities will be determined on a site-by-site basis proportionate to the size 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 ensure that the Plan is clear and effective.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM188	369	Policy 11.7 part g	<p>The council's nomination rights to secure nomination of tenants to specified affordable homes and the management and monitoring arrangements will be secured via planning obligation (s106 legal agreements) or other appropriate legal deed.</p> <p>All affordable housing elements of the scheme must be affordable in perpetuity <u>and secured via planning obligation or any other appropriate mechanism.</u></p> <p><u>Those proposing build to rent schemes are encouraged to work with the Council in order to make proposed affordable housing available for households on the Council's housing list.</u></p>	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM189	369	Policy 11.7 part h	A clawback mechanism must be in place that ensures that where any of the Built to Rent homes are sold within the 15 years this will trigger a penalty charge towards affordable housing provision in accordance with Policy <u>H11.7(f)</u> H4.7(f).	To ensure that the Plan is clear and effective.	No change to HRA findings. No 'likely significant effects'
MM190	371	11.7.4	By having nomination rights, we will help to ensure that prospective tenants have been appropriately vetted as in genuine need in terms of the inability to access rented accommodation on the open market locally.	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM191	371	New paragraph below 11.7.4	<u>A clawback mechanism will be applied in accordance with London Plan policy and national Planning Practice Guidance (PPG) on Build to Rent to protect the value of affordable housing provision that is withdrawn if housing units in Build to Rent blocks are converted to another tenure after the expiry of the covenant period.</u>	To ensure that the Plan is effective and in general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'
MM192	374, 376, 378	Policy D12.1 Delivering well designed and resilient neighbourhoods, part a	Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and <u>have regard to (MM15) existing and emerging policy guidance.</u> and good practice guidance.	To ensure that the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM193	374	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods, part c	Encourage and enable sustainable and healthy lifestyle choices through effective public realm that facilitates active modes of transport as set out in the chapters in this Local Plan on Health and Wellbeing and Transport.	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM194	375	Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods, part f	Enhance social cohesion and mental and physical wellbeing and support the needs of all of Merton's communities through creating sustainable buildings, spaces and environments that are well-managed, accessible, inclusive, child friendly and intergenerational <u>in line with the chapter on Health and Wellbeing.</u>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM195	376	12.1.1	... To help deliver the principles of good design throughout the borough, Merton Council has produced a variety of Supplementary Planning Documents that provide good practice approaches to design, such as Merton's Borough Character Study, and Conservation Area character appraisals <u>and Small Sites Toolkit.</u>	In the interests of effectiveness.	No change to HRA findings. No 'likely significant effects'
MM196	376	12.1.2 and new paragraph above	<u>1.1.1. Similar to Merton's Supplementary Planning Documents, many statutory bodies, such as the Greater London Authority, Historic England and Sport England produce policy guidance, such as London Plan guidance and Good Practice Advice notes. These provide detailed guidance and advice on a wide range of issues that support the implementation of relevant legislation and national and regional planning policy. These guidance documents can help inform the design of development proposals.</u> 12.1.2. Designing with sustainable and construction principles from the start can help minimise costly changes later on in the process.	To ensure that the Plan would be effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM197	376	New paragraph below 12.1.3	<u>Development in the borough must consider all sections of the community, in particular disabled people. An inclusive environment is one, which can be used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people as set out in the chapter Health and Wellbeing.</u>	In the interests of clarity and to ensure consistency with national policy insofar as it requires policies to ensure that developments create places that are safe, inclusive and accessible (paragraph 130 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM198	376	New paragraph below 12.1.3	<u>Development should pro-actively plan for health and wellbeing through sport and activity. Developers should consider following Sport England and Public Health England's Active Design 10 principles, guides and checklist to help ensure their development's layout and design helps to promote active lifestyles.</u>	In the interests of clarity, and to ensure that the Plan is effective. .	No change to HRA findings. No <i>'likely significant effects'</i>
MM199	377	New paragraph below 12.1.7	<u>The production of design guides and codes can provide maximum clarity about design expectations at an early stage and should be consistent with the principles set out in the National Design Guide and National Model Design Code. This is highlighted in the NPPF para 128 and 129.</u>	To achieve consistency with national policy (paragraphs 128 to 129).	No change to HRA findings. No <i>'likely significant effects'</i>
MM200	378	Policy D12.2 Urban design, part a	Be of the highest standard and <u>have regard</u> adhere (MM15) to the most appropriate policy guidance and best practice.	To ensure that the Plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>
MM201	378	Policy D12.2 Urban design, part a	Be of the highest standard and adhere to the most appropriate policy guidance and best practice. (MM192) <u>take into account the most up to date and relevant national guidance and London Plan and council policies and guidance.</u>	To ensure that the Plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM202	378	Policy D12.2 Urban design, part b	Ensure that urban layouts are easy to navigate and permeable to cyclists and pedestrians through recognisable streets and spaces that link in seamlessly with surrounding development and facilitate active modes of transport.	To ensure consistency with national policy in terms of avoiding unnecessary repetition (paragraph 16 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM203	378	Policy D12.2 Urban design, part d	Ensure that the form and layout of new development should be is street-based with clearly identifiable publicly accessible streets and spaces , defined by buildings that actively front the street, and which maximise the number of entrances onto the street and create defensible space and facilitate natural surveillance.	To ensure that the Policy is clear and effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM204	378	Policy D12.2 Urban design, part f	Provide and reinforce a clearly identifiable network of public streets and spaces that constitute the public realm, based on the creation of defensible space and natural surveillance, creating an appropriate gradation between public and private space.	To avoid unnecessary repetition and this comply with national policy (paragraph 16 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM205	380	Policy D12.2 Urban design, part h	Be economically and socially sustainable, by offering variety and choice, and by being able to adapt to changing climatic, social, technological and economic conditions without minimising the need for future remedial intervention.	To ensure that the policy is justified and effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM206	380	Policy D12.2 Urban design, part j	If located in Town Centres , high streets and other shopping areas: the development must also interact positively with the public realm by the creation of creating active and attractive frontages that promote natural surveillance through visibility between the street and the interior of the building. and Street frontages should not create dead frontage through lack of windows or provision of advertising, shelves or screening which prevents easy visibility between the ground floor and the street.	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM207	380	Policy D12.2 Urban design, part l	Achieve high quality urban and building design from the outset and is not undermined by variations that individually or collectively devalue design quality, particularly those variations that are sought after the grant of planning permission.	To ensure that the Plan is justified and effective.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM208	380	Policy D12.2 Urban design, part m	Consider on larger sites or locally significant sites <u>sites within Town Centre boundaries</u> , the benefits of temporary uses before and during construction stages.	To ensure that the Policy is justified.	No change to HRA findings. <i>No 'likely significant effects'</i>
MM209	380, 384	Policy D12.2 Urban design, new criteria below part v	<u>Ensure that any proposed public realm is well-managed and maintained. Maintenance and management arrangements will be secured through planning obligations.</u>	To ensure clarity and that the contributions expected from development are set out in the Plan, and thus secure consistency with national policy (paragraphs 16 and 34 NPPF).	No change to HRA findings. <i>No 'likely significant effects'</i>
MM210	384	New paragraph below 12.2.11	<u>The long-term maintenance and management of public realm should be considered from the start of the design process.</u>	To ensure that the policy is effective, and that the Plan includes clear design expectations and thus achieve consistency with national policy (paragraph 127 NPPF).	No change to HRA findings. <i>No 'likely significant effects'</i>
MM211	387	Policy 12.3 Ensuring high quality design for all developments, part a	Take a design-led approach to development that responds <u>positively</u> to the site's context and character.	To ensure that the Plan is effective and in general conformity with the London Plan.	No change to HRA findings. <i>No 'likely significant effects'</i>

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MM212	387	Policy 12.3 Ensuring high quality design for all developments, new policy after part c	<u>Demonstrate they do not unduly prejudice development opportunities on neighbouring sites, including across borough boundaries.</u>	To ensure effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>
MM213	387	Policy 12.3 Ensuring high quality design for all developments, part f, g and after	f. Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens. g. Protect new and existing development from visual intrusion, <u>Demonstrate that impacts of proposals in terms of noise, vibrations, odour and/or pollution are minimised, and that acceptable light, privacy and outlook would be available to existing and future occupants of the proposed development and its surroundings</u> so that so that the living conditions of existing and future occupiers are not unduly diminished <u>a high standard of amenity is provided.</u>	To ensure that unnecessary repetition is avoided, to clarify the policy, and to achieve consistency with national policy relating to residential amenity (paragraphs 16 and 130 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM214	387	Policy 12.3 Ensuring high quality design for all developments, part i	In residential developments provide an area of communal amenity space in addition to requirements for private amenity space. Site layout, privacy, overlooking and daylight/sunlight requirements should be used to determine the appropriate amount, location, shape and design of such space.	To ensure that the Plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>
MM215	387, 388	Policy 12.3 Ensuring high quality design for all developments, part n	Provide outdoor amenity space <u>that meets, or exceeds, the standards set out in the London Plan and</u> whether public, private or communal which accords with appropriate minimum standards, is efficiently laid out and is compatible with the character of surrounding areas. <u>In exceptional circumstances where it is not possible to meet the minimum private amenity standards, the remainder should be supplied in the form of communal amenity space.</u>	To ensure that the Policy is clear and in general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM216	387	Policy 12.3 Ensuring high quality design for all developments, after part o	<u>Ensure that materials used in their construction are well-detailed, safe and robust.</u>	To ensure that the Plan would be clear and effective.	No change to HRA findings. No 'likely significant effects'
MM217	388	Policy 12.3 Ensuring high quality design for all developments, part q	Where developments are <u>propose</u> houses and/ <u>or</u> ground floor maisonettes/duplex units, require a garden with a minimum area of 50m ² as a single useable regular shaped <u>private</u> amenity space <u>is required</u> . Flexibility may be applied <u>where applicants can demonstrate the site is constrained.</u> to constrained sites and higher density development where justified.	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM218	391	New paragraph below 12.3.1	<u>Design and Access Statements (DAS) are a short report that accompanies a planning application. They must explain the design principles and concepts that have informed the development and also demonstrate how the development's context has influenced the design. The level of detail in a DAS should be proportionate to the scale and type of the application. Merton's Small Sites Toolkit SPD contains a DAS template that applicants may use to assist applications on small sites.</u>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM219	391	New paragraph below 12.3.1	<u>1.1.2. Amenity refers to the elements of a location or neighbourhood that helps make it attractive or enjoyable for residents and visitors. Residential amenity refers to the elements that are particularly relevant to the living conditions of a home, such as privacy, outlook, natural light and other environmental factors in both indoor and outdoor spaces. Proposals are expected to demonstrate how the development provides a high standard of amenity and that they will not have an undue impact on existing neighbouring amenity.</u>	To clarify the Plan and ensure that it is consistent with national policy relating to amenity (paragraphs 16 and 130 NPPF).	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>Neighbouring sites are considered as sites that are adjacent, adjoining or in close proximity to the proposed site where the development is likely to have an impact. Site layout, building orientation, location of uses and materials should be considered early in the design process to mitigate and minimise potential issues. The DAS should provide an adequate amount of evidence to demonstrate this using 3D representations and drawings. Technical assessments may be required and should be carried out by a suitably qualified consultant.</u>		
MM220	391	12.3.2	Well sized and proportioned rooms contribute to designing successful homes. Housing developments should consider accommodating <u>Building Regulations</u> Approved Document Part M, Appendix D: Furniture Schedule in their lay outs. <u>To ensure homes are accessible to everyone regardless of their mobility or age, housing developments should also be step free, accessible and adaptable in line with London Plan 2021 policy D7 “accessible housing” and Approved Document M; flexibility may apply within blocks of 4 storeys or less in certain exceptional circumstances as outlined in London Plan policy D7.</u>	To ensure general conformity with the London Plan.	No change to HRA findings. No <i>‘likely significant effects’</i>
MM221	391	Below 12.3.6	<u>Historically, planning guidance has provided clear parameters on separation distances from habitable rooms of neighbouring properties. Adhering rigidly to these parameters can lead an arrangement of buildings that do not reflect the character of the neighbourhoods where they are located, such as more urban settings or tighter mews settings. As such, separation distances used must demonstrate they provide adequate privacy for occupiers and ensure they provide good levels of daylight into the dwellings.</u>	To ensure that the Plan is justified and effective.	No change to HRA findings. No <i>‘likely significant effects’</i>
MM222	391	New paragraph below 12.3.6	<u>TfL’s London Cycle Design Standards provides guidance for the design of dedicated cycle infrastructure.</u>	In the interests of clarity.	No change to HRA findings.

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					No 'likely significant effects'
MM223	391	New paragraph below 12.3.6	<u>Communal amenity should be multifunctional; designed for playing, socialising and relaxing and if outdoors, be green and biodiverse. They should provide sufficient space to meet the requirements of the number of residents. There may be cases where the optimisation of sites may impact the quantum of communal amenity achievable. This will be considered on a case-by-case basis. Flexibility may be applied if developers successfully demonstrate that the amount of amenity space provided is acceptable, taking into account factors such as the character of the area, access to public open spaces and the quantity and quality of private amenity spaces. In these cases, the quality of any communal space will need to be high.</u>	To ensure that the policy is justified.	No change to HRA findings. No 'likely significant effects'
MM224	394	12.3.21	However, inappropriate and unnecessary lighting or lighting which is insensitively used can adversely affect amenity in terms of light pollution to neighbouring occupiers and to the night sky. When considering light proposals the council will seek to ensure that unacceptable levels of illumination are controlled by conditions or that unacceptable proposals are refused planning permission.	To ensure that the plan is justified and clear.	No change to HRA findings. No 'likely significant effects'
MM225	399	Policy D12.4 Alterations and extensions to existing buildings	To achieve high quality design and protection of amenity within the borough, alterations or extensions to buildings will be expected to meet the following criteria: <ul style="list-style-type: none"> a. Be of high quality design that responds to the local character of the neighbourhood b. Respect and complement the design and detailing of the original building. c. Respect the form, scale, bulk, and proportions of the original building. d. Use robust external materials that will be appropriate to the original building and to its surroundings. 	To ensure consistency with national policy in terms of achieving clarity, avoiding unnecessary repetition, and design and amenity considerations (paragraph 16 and section 12 NPPF).	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>e. Respect space between buildings where the rhythm contributes to the character <u>Be sympathetic to the built form pattern</u> of the area and to avoid <u>the creation</u> of long conjoined facades <u>where this would be of detriment to the character and appearance of the area.</u></p> <p>f. Complement the character and appearance of the wider setting;</p> <p>g. Ensure that noise, vibrations or visual disturbance resulting from the development do not diminish the living conditions of existing and future residents.</p> <p>h. Where the proposal incorporates a new or altered roof profile, ensure that materials are sympathetic to the original building and the surrounding area;</p> <p>i. Seek to minimise carbon emissions from existing buildings in accordance with the chapter on Climate Change</p> <p>j. Ensure proposals for dormer windows are of a size and design that respect the character and proportions of the original building and surrounding context, do not dominate the existing roof profile and are sited away from prominent roof pitches, unless they are a specific feature of the area;</p> <p>k. Ensure that roof forms, <u>including dormer windows,</u> and materials are of an appropriate size, type, form and material for the existing building <u>and surrounding context,</u> such that they are not unduly dominant, and respect the prevailing positive characteristics of the area.</p> <p>l. Demonstrate that the proposal does not significantly impact the quality of neighbouring buildings and amenity through overshadowing and overlooking.</p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>m. Seek to improve levels of biodiversity through interventions such as green roofs, sustainable drainage or soft landscape.</p> <p>n. Ensure that there is no increase in risk of flooding to surrounding area, either due to displacement of floodwater or diversion of flood flowpaths.</p>		
MM226	400	12.4.2	The council's Borough Character Study SPD , Conservation Area Character Appraisals SPD's and Small Sites Toolkit SPD should be used to provide applicants with design guidance.	To ensure clarity	No change to HRA findings. No 'likely significant effects'
MM227	402, 403, 406, 407, 660	Policy D12.5 Managing heritage assets	<p>Merton has a wealth of heritage assets including conservation areas, listed buildings and structures and scheduled ancient monuments. This policy aims to conserve and enhance Merton's heritage assets, their significance, settings and distinctive local character.</p> <p>a. Development proposals affecting a heritage asset or its setting will be assessed against the required to be in accordance with the (MM227) following criteria (MM15)</p>	To ensure consistency with national policy (section 16 NPPF).	No change to HRA findings. No 'likely significant effects'
MM228	402	Policy D12.5 Managing heritage assets, part a	<p>i.—principles set out in the National Planning Framework 2019 and 2021 draft national policy and the London Plan, and should take into account detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, <u>The London Plan</u>, and Historic England guidance;</p> <p>ii.—Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.</p>	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM229	402	Policy D12.5 Managing heritage assets, part b	All development proposals associated with the potential to impact the significance or setting of the borough's heritage assets or their setting will be expected to demonstrate, within a Heritage Statement, how the proposal conserves, and where	To ensure consistency with national policy (section 16 NPPF),	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			appropriate possible enhances the significance of the asset in terms of its individual architectural or historic interest and its setting.	and to ensure that the Plan is justified.	
MM230	402	Policy D12.5 Managing heritage assets, part c	In accordance with the NPPF, any alteration or destruction of a heritage asset, or development that has an impact on the significance and/or setting of a heritage asset will require clear and convincing justification. Substantial harm to or loss of:	To ensure consistency with national policy.	No change to HRA findings. No 'likely significant effects'
MM231	402	Policy D12.5 Managing heritage assets, part c. ii.	Assets of the highest significance, grade I and II* listed buildings or registered parks and gardens should be wholly exceptional. <u>Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional</u>	To ensure consistency with national policy	No change to HRA findings. No 'likely significant effects'
MM232	402	Policy D12.5 Managing heritage assets, part e	The loss of a building that makes a positive contribution to a conservation area or heritage site <u>the setting and/or significance of a heritage asset should be avoided. Proposals involving the loss of such buildings will not be supported unless any harm caused is clearly and convincingly justified and satisfies the requirements of national policy relating to the conservation of heritage assets.</u> also be treated as substantial harm to a heritage asset	To ensure consistency with national policy (section 16 NPPF)	No change to HRA findings. No 'likely significant effects'
MM233	403	Policy D12.5 Managing heritage assets, part f	Proposals affecting <u>the layout, design, character, use and function of both designated and non-designated</u> a heritage assets or its <u>their</u> settings should conserve and look for opportunities to enhance their significance of the asset as well as its surroundings and have regard to the following: i. The conservation, or reinstatement of <u>of</u> lost, of features that contribute to the asset or its setting. This may include original chimneys, windows and doors, boundary treatments and garden layouts, roof coverings or shop fronts. In listed buildings, internal features such as fireplaces, panelling, ceilings, doors and architraves as well as <u>surface treatments</u> , the proportion of individual rooms <u>and historic layout</u> may also be of significance.	To ensure that the Plan is effective and consistent with national policy.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>ii. The removal of harmful alterations such as inappropriate additions, non-original windows and doors and the removal of paint or pebbledash from brickwork.</p> <p>iii. Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the heritage asset will not be taken into account in any decision.</p> <p><u>Proposals should not prejudice the future restoration of designated historic parks and gardens.</u></p>		
MM234	403	Policy 12.5.g	Proposals <u>relating</u> to existing heritage assets buildings should seek to improve the proposals energy efficiency effectively and sensitively and without detrimental visual impact on the heritage asset, or <u>the wider significance and</u> setting of the heritage asset.	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM235	405	12.5.5	The identification of a heritage asset could be through a range of means. This could include formal designation such as conservation area or listed, or locally listed building status. Buildings in a conservation area identified as having a positive contribution to its character will be considered as non-designated heritage assets in their own right <u>if they meet Merton's local listing selection criteria</u> . Heritage assets may also be identified <u>in any updates to the Borough Character Study SPD, during the update to the local list,</u> or during the development control process itself.	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM236	406	12.5.7	Heritage statements will be required to set out how proposals conserve, enhance or restore <u>the significance of</u> heritage assets and where appropriate, conservation management plans should be prepared for the future maintenance and management of the asset.	To ensure consistency with national policy (section 16 NPPF)	No change to HRA findings. No <i>'likely significant effects'</i>
MM237	406	12.5.8	The level of detail provided in the heritage statement should be proportionate to the asset's importance in terms of the significance of the asset affected and the impact of the proposal. Where the proposal includes has a substantial impact on the significance of a heritage asset, it and should be carried out by a specialist <u>suitably qualified</u> historic environment consultant.	To ensure consistency with national policy, and in the interests of justification and effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>

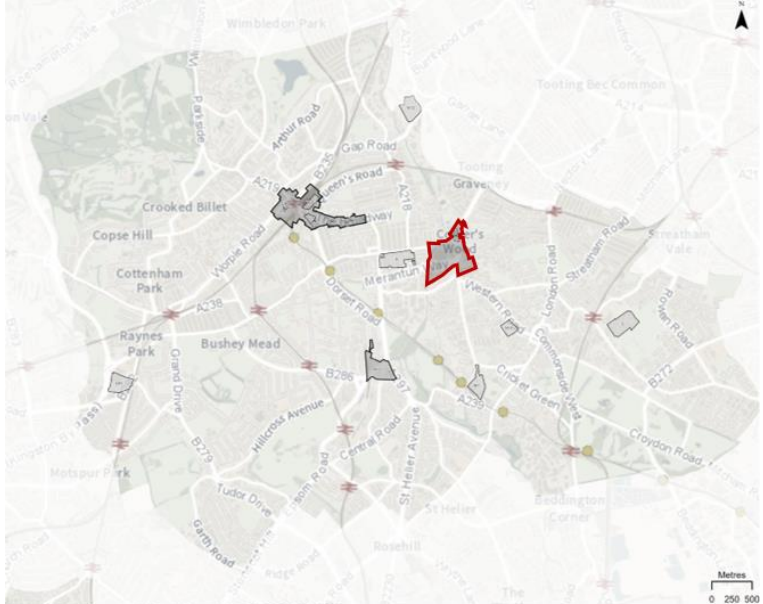
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>Historic England Advice Note 12 ‘Statements of Heritage Significance’ provides further information.</u>		
MM238	407	12.5.14	<p>In the past there has been tension between the requirements to improve the energy performance and reduce carbon from buildings that are or that are located within heritage assets and the need to conserve these historic assets. The council is supportive of efforts to tackle the climate emergency and will positively consider proposals for retrofitting <u>heritage assets, including structures within Conservation Areas, where the proposals will not cause harm to the significance of the heritage asset. Where proposals would cause harm to the significance of a heritage asset or its setting applications will be assessed against national policy and guidance</u> buildings that are themselves or within heritage assets, where these proposals do not cause substantial harm to the heritage assets.</p>	To ensure consistency with national policy relating to the conservation of heritage assets and the need for policies to be unambiguous.	No change to HRA findings. No <i>‘likely significant effects’</i>
MM239	408	Policy D12.6 Tall Buildings, text	<p>1.1.3. Starting on page 408 – policy 1.1.4. 1.1.5. Tall buildings in the borough are defined as a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey as set out in Policy D9 of the London Plan. Tall buildings in the borough are defined as a minimum of 21m from the ground level to the top of the uppermost storey.</p> <p>1.1.6. In the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and sense of place. They can act as visual markers, such as the redeveloped Britannia Point in Colliers Wood, provide architectural variety, such as Glebe Court in Mitcham, and optimise a sites potential for homes and jobs such as the future of High Path in South Wimbledon. It is crucial that tall buildings are of the highest quality of design and construction.</p> <p>1.1.7. Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre and the Wider</p>	To ensure that the Plan is positively prepared, effective, justified, in general conformity with the London Plan, and consistent with national policy relating to making effective use of land (section 11 NPPF).	No change to HRA findings. No <i>‘likely significant effects’</i>

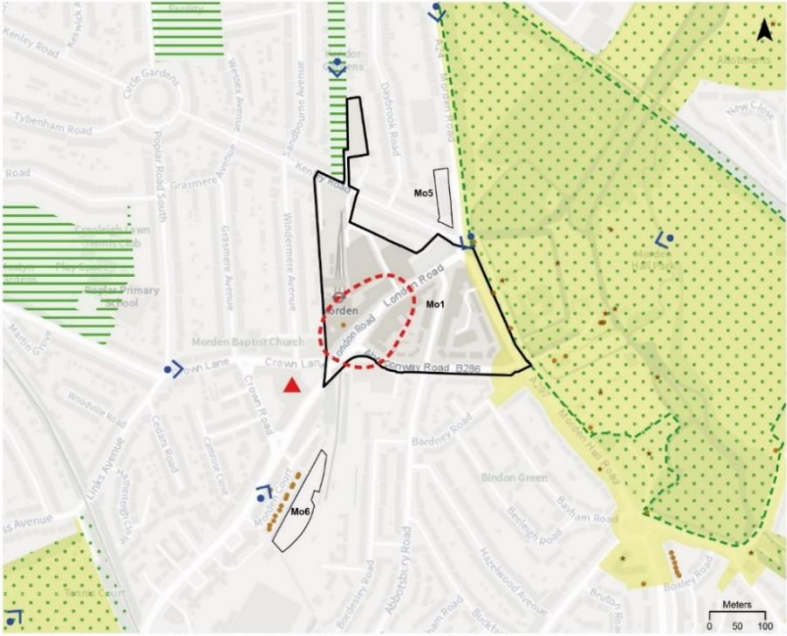
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case.</p> <p><u>1. Tall buildings are only acceptable in the following locations:</u></p> <p><u>a. As indicated in the Strategic Heights Diagrams for Morden Regeneration Zone and Wimbledon Town Centre.</u></p> <p><u>b. Wimbledon Town Centre, as set out within the chapter on Wimbledon.</u></p> <p><u>c. Morden Regeneration Zone, as set out within the chapter on Morden.</u></p> <p><u>d. As set out within Merton’s adopted Estates Local Plan 2018 for Eastfields and High Path estates.</u></p> <p><u>e. Where they are identified in the following site allocations, CW2, Mi1, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.</u></p> <p><u>f. On sites immediately adjacent to the above locations, where they would provide design-led opportunities for appropriate transitional elements between differing building scales.</u></p>		

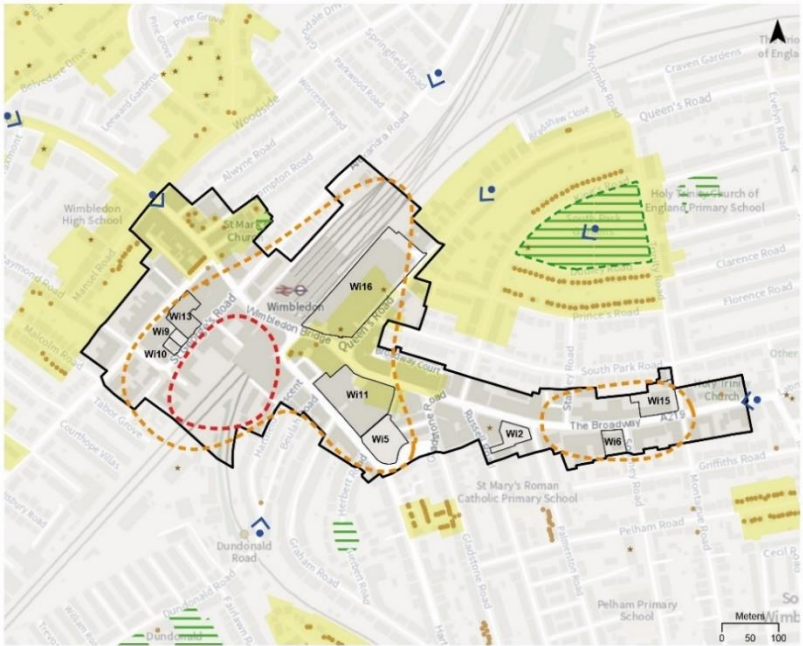
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><i>Within Supporting Text starting on page 411 below para 12.6.6</i> <u>Design Guides and/or Codes are useful tools to assist in the creation of beautiful and distinctive places with a consistent and high-quality standard of design. They deliver a design-led approach that can help optimise the capacity of a site while ensuring that its final design reflects local character and design principles.</u></p> <p><u>The National Design Guide and National Model Design Code provide a series of tests for assessing whether a place is well designed or not and will be used to guide the determination of planning applications.</u></p> <p><u>This policy requires exemplary design for proposals containing tall buildings. To demonstrate this, Design Guides and/or Design Codes should be prepared for these sites, either by applicants or the council. All Design Guides or Design Codes should be based on effective community engagement and reflect local aspirations for the development of the area and should take into account the guidance contained in the National Design Guide and the National Model Design Code.</u></p> <p><u>In instances where an applicant is proposing the redevelopment of a site immediately adjacent to the tall building boundaries and clusters identified in the Strategic Height Diagrams, local Design Guides or Design Codes may be used as part of a robust design-led approach to demonstrate the appropriate stepping up of heights above or below those stated and avoid abrupt transitions in building heights.</u></p>		
MM240	408	Policy D12.6 Tall Buildings, text	<p>2. We <u>The council</u> (AM236) will generally support tall buildings <u>in those locations set out in part 1 of this policy</u> where <u>they meet all of the following criteria:</u></p>	To ensure that the policy is effective.	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
					No 'likely significant effects'
MM241	408	Policy D12.6 Tall Buildings part 2	<p><u>They accord to the most up to date and relevant national guidance and London Plan and council policies, guidance and relevant site allocations.</u></p> <p>a. Their massing, bulk and height are appropriately...</p>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
M242	408, 410, 411	Policy D12.6 Tall Buildings part 2: a, b and c	<p>a. Their massing, bulk and height are appropriately sized and located and demonstrate they do not undermine <u>take into account</u> local character and heritage assets and their settings through townscape analysis of short, mid and long views, taking into account individual and cumulative effects.</p> <p>b. They enhance <u>avoid harm to</u> the setting and <u>significance of</u> /or relationship with neighbouring heritage assets.</p> <p>c. They are of exceptional <u>exemplary</u> design and architectural quality.</p> <p>d. They are informed by the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.</p> <p>d.</p>	To ensure consistency with national policy relating to the conservation of heritage assets and achieving well-designed places (sections 12 and 16 NPPF)	No change to HRA findings. No 'likely significant effects'
MM243	409	Policy D12.6 Tall Buildings Part 2 e	They respond to the council's Design Review Panel, where applicable, which provides independent design scrutiny from a panel of industry experts.	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM244	409	Policy D12.6 Tall Buildings Part 2 :f and j	<p>f. They ensure the ground and lower levels are designed for a human scale, and maximise the amount of active frontage and natural surveillance <u>and create a positive contribution to the public realm.</u></p> <p>...</p>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			They include high quality and useable public open space, appropriate in size and location to the building and its site characteristics		
MM245	409	Policy D12.6 Tall Buildings Part 2: g and k	g. They do not impact the opportunities of neighbouring or adjoining sites, including across borough boundaries. 1.1.8. ... j. They're an appropriate material pallet that is well detailed safe is proposed.	To ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM246	409	Policy D12.6 Tall Buildings Part 2 :l	Where appropriate, they provide a mix of tenure and home sizes in accordance with this Local Plan's policies on Housing.	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM247	409	Policy D12.6 Tall Buildings, part 2: p-r	p. They're within Wimbledon town centre, as set out in the Future Wimbledon supplementary planning document. q. They are within Morden, as set out and site allocation Mo4. r. They are within Colliers Wood, as set out within the site allocation CW2.	To ensure that the Policy is effective and clear.	No change to HRA findings. No 'likely significant effects'
MM248	410	Policy D12.6 Tall Buildings, new criterion before part s	1.1.9. 3. Development proposals for tall buildings should be supported by: 1.1.10. <u>Adequate information demonstrating how the proposals comply with all the criteria within section 2 of this policy, and within the London Plan policy on tall buildings to ensure that the proposals have considered visual, townscape and heritage impacts.</u>	See MM242 at page 408. To improve clarity, the policy is separated into 3 parts that address location, conforming criteria and submission requirements	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM249	410	Policy D12.6 Tall Buildings	<p><i>Diagram to be added at the end of the policy text:</i> Map of appropriate locations for tall buildings (illustrating Policy D12.6 part 1 (a-f))</p>  <p>Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)</p> <ul style="list-style-type: none"> Town Centre boundaries (Colliers Wood; Morden Regeneration Zone & Wimbledon) Relevant site allocations and estates local plan boundaries 	To be in general conformity with London Plan Policy D9 Tall Buildings, with particular reference to part B1, and to ensure that the Plan is justified, effective and positively prepared.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM250	410	Policy D12.6 Tall Buildings	<p><i>Diagram to be added at the end of the policy text:</i> Strategic Heights Diagram, Morden Regeneration Zone</p>  <p>Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)</p> <ul style="list-style-type: none"> Morden Regeneration Zone heights range-up to where buildings of circa 39m* could be appropriate, subject to all other policy requirements. (approx-up to 6-storey) Indicative location of tall building cluster heights-range-up to where buildings of circa 71m* could be appropriate, subject to all other policy requirements. (approx-up to 22-storey) ▲ Morden Civic Centre approx height: 58m* (16-storey) ➤ Townscape views into town centre Site allocations ● Metropolitan Open Land (MOL) ▬ Open space Conservation area Registered parks and gardens ★ Listed buildings ● Locally listed buildings <p>* Heights from ground level. More information on building heights can be found in the supporting text.</p>	To be in general conformity with London Plan Policy D9 Tall Buildings, with particular reference to part B1, and to ensure that the Plan is justified, effective and positively prepared.	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>Strategic Heights Diagram, Wimbledon town centre</p>  <p>Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)</p> <ul style="list-style-type: none"> Wimbledon town centre heights-range-up to where buildings of circa 24m* could be appropriate, subject to all other policy requirements [approx-up to 6-storeys] Indicative location of tall building cluster heights-range-up to where buildings of circa 40m* could be appropriate, subject to all other policy requirements [approx-up to 10-storeys] Indicative location of tall building cluster heights-range-up to where buildings of circa 48m* could be appropriate, subject to all other policy requirements [approx-up to 12-storeys] Townscapes views into town centre Site allocations Metropolitan Open Land [MOL] Open space Conservation area Registered parks and gardens Listed buildings Locally listed buildings <p>* Heights from ground level. More information on building heights can be found in the supporting text.</p>		
MM251	411	New paragraph below 12.6.2	<p>Merton's definition of 'a minimum of 21m from the ground level to the top of the building's last habitable floor' provides further clarity and is equivalent to the London Plan definition</p>	Text and table added to secure clarity and	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings																																	
			<p><u>of ‘tall buildings should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey’.</u></p> <p><u>Storey heights will differ across different land uses as well as different methods of construction. The table below provides indicative building heights based on residential and commercial uses.</u></p> <table border="1"> <thead> <tr> <th>Building storeys</th> <th>Indicative residential building height (metres) (3.2m floor to floor)</th> <th>Indicative commercial building height (metres) (4.0m floor to floor)</th> </tr> </thead> <tbody> <tr><td>1</td><td>3.2</td><td>4.0</td></tr> <tr><td>2</td><td>6.4</td><td>8.0</td></tr> <tr><td>3</td><td>9.6</td><td>12.0</td></tr> <tr><td>4</td><td>12.8</td><td>16.0</td></tr> <tr><td>5</td><td>16.0</td><td>20.0</td></tr> <tr><td>6</td><td>19.2</td><td>24.0</td></tr> <tr><td>7</td><td>22.4</td><td>28.0</td></tr> <tr><td>8</td><td>25.6</td><td>32.0</td></tr> <tr><td>9</td><td>28.8</td><td>36.0</td></tr> <tr><td>10</td><td>32.0</td><td>40.0</td></tr> </tbody> </table>	Building storeys	Indicative residential building height (metres) (3.2m floor to floor)	Indicative commercial building height (metres) (4.0m floor to floor)	1	3.2	4.0	2	6.4	8.0	3	9.6	12.0	4	12.8	16.0	5	16.0	20.0	6	19.2	24.0	7	22.4	28.0	8	25.6	32.0	9	28.8	36.0	10	32.0	40.0	ensure that the policy is justified.	No ‘likely significant effects’
Building storeys	Indicative residential building height (metres) (3.2m floor to floor)	Indicative commercial building height (metres) (4.0m floor to floor)																																				
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MM252	411	12.6.5	<p>Merton’s Borough Character Study <u>SPD provides more detail of different character areas within the borough and a framework for character-led tall buildings that highlights good practice design approaches.</u> gives holistic guidance on best practice design approach on tall buildings. highlighting the importance of a sites suitability and sensitivity.</p>	To ensure that the Plan is justified and effective.	No change to HRA findings. No ‘likely significant effects’																																	
MM253	411	Below 12.6.7	<p><u>Consideration must be given to ensure the development is inclusive for all sections of the community, in accordance with policies on Health and Wellbeing.</u></p>	To ensure consistency with national policy relating to the creation of inclusive and accessible places (paragraph 130(f) NPPF)	No change to HRA findings. No ‘likely significant effects’																																	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM254	411	New paragraph below 12.6.7	<u>Tall buildings should be part of a positive strategy for the historic environment and seek to avoid harm to the significance of heritage assets and their settings. In line with the London Plan, proposals resulting in harm will require clear and convincing justification, including what alternatives were explored and what public benefits outweigh the harm.</u>	To secure consistency with national policy (section 16 NPPF) and general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>
MM255	412	Policy D12.7 Advertisements, part	<p>a. Express consent will only be granted for advertisements where they do not harm the character of an area, amenity or public safety. When assessing proposals for new advertisements, cumulative impacts will be taken into account.</p> <p>b. The council will ensure that:</p> <p>...</p> <p>iv. <u>Advertisements</u> They do not adversely impact on trees <u>that have a significant amenity value</u> on or in close proximity to the proposed site, especially those protected by Tree Protection Orders (TPOs) or within conservation areas.</p> <p>v. <u>Local Amenity is not harmed by the restriction of</u> vVisual permeability and natural surveillance between the street and inside non-residential buildings is not compromised by internally applied artwork, blinds or advertising, <u>where the local planning authority's permission or consent for such items is required.</u></p>	To ensure that the policy is justified, effective and consistent with national policy (paragraph 136 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM256	415	Policy D12.8 Digital infrastructure, part c. vi.	In particularly sensitive areas, notably where heritage assets are affected, locate equipment in underground chambers, <u>or demonstrate a design-led solution that does not harm the significance of the heritage assets.</u>	To ensure that the Plan is justified, effective and consistent with national policy relating to the conservation of heritage assets and	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
				the sympathetic design of new electronic communications equipment (section 16 NPPF, and paragraph 115)	
MM257	417	Policy 12.9 Shop front design and signage, part (d)(ii)	Where security shutters are considered necessary, they must be installed on the inside of the shopfront and allow clear views into the shop— <u>Unless it can be demonstrated that they are required for specific security reasons,</u> solid, near solid shutters and shutters <u>on the outside of a shop front are not acceptable</u> will not be permitted and no type of security shutters will be permitted on the outside of a shop front; ...	To ensure that the Plan is effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM258	417	Policy 12.9 Shop front design and signage, part e	Shop-fronts must be of a high quality <u>design</u> and well-proportioned and designed and should be designed in accordance with the council's Shopfront Supplementary Planning Document 2017.	To ensure that the Policy is effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM259	419	Policy D12.10 Dwelling Conversions, part b.	<u>Dwelling conversions proposals should s</u> Seek to minimise carbon emissions from existing buildings in accordance with the chapter on climate change <u>policies on Climate Change.</u>	To ensure clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM260	423	Policy 12.11 Basements and subterranean design, part g	All basements or subterranean developments must not comprise of more than one storey and not extend beyond the outer walls of the original property (prior to alterations) to more than 50% of the original dwelling's footprint. <u>Any basements proposed as alterations to existing buildings must not comprise more than one storey and not extend beyond the outer walls of the original property (prior to alterations) to more than 50% of the original dwelling's footprint;</u> <u>Any basements proposed as part of new build or redevelopments must not comprise of more than one storey</u>	To ensure that the policy is justified and effective.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>and not exceed 50% of either the front, rear or side garden of the property;</u></p> <p><u>All basement proposals should ensure that garden areas relating to the site provide an acceptable standard of amenity;</u></p>		
MM261	423	Policy 12.11 Basements and subterranean design, part h	All <u>Any</u> basements or subterranean <u>development</u> must be appropriate to its setting and designed <u>the character and appearance of its surroundings</u> , have regard to the health and well-being of its occupants, <u>and</u> provide access to natural light and ventilation.	To ensure that the policy is effective and clear.	No change to HRA findings. No ' <i>likely significant effects</i> '
MM262	423	Policy 12.11 Basements and subterranean design, part 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 to protect basements from the risk of sewer flooding.</u>	To ensure that the Plan is effective insofar as the consideration of flood risk issues is concerned.	No change to HRA findings. No ' <i>likely significant effects</i> '
MM263	424	12.10.8	This policy applies to all new basement or subterranean developments, including the construction or extension below the prevailing ground level of a site or property. Subterranean and other basement developments are 'development' as defined by the Town and Country Planning Act 1990 as amended. This policy focuses on the design element of basement developments. <u>The flooding policy F15.8 should also be read to ensure that all basement developments do not result in an increase in flood risk either to or from the basement.</u>	To ensure that the Plan is clear and effective.	No change to HRA findings. No ' <i>likely significant effects</i> '

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM264	426, 427	12.10.16	<p>The impact of basement and subterranean development proposals on heritage assets must be assessed on their merits to avoid any harm to their significance or historic integrity. Listed buildings are recognised for their exceptional heritage value and once a listed building is severely damaged or demolished, that historical connection is lost forever. Basements beneath the garden of a listed building are not permitted except on larger sites where the harm to the building's structure or setting and the basement is substantially separate from the listed building, and <u>Any application for a basement to a designated or non-designated heritage asset should be accompanied by a detailed method statement which demonstrates how the development can be achieved without causing harm to the significance and structural integrity of the asset. Where a level of harm is identified</u> the acceptability of such schemes will be assessed on a case by case basis <u>and in line with Policy D12.5 'Managing Heritage Assets', national policy and guidance.</u></p>	<p>In response to Stage 2 MIQ's Matter 12 Q22. To better align with NPPF and to improve clarity.</p> <p>To improve clarity and ensure effectiveness</p>	<p>No change to HRA findings. No <i>'likely significant effects'</i></p>
MM265	426	12.10.17	<p>The link between the listed building and the basement should be discreet and of an appropriate design and location that does not adversely impact on the significance of the listed building. In the exceptional circumstances wWhere these are allowed, there should be no extensive modification to the foundations of the listed building or any destabilisation of the listed structure and account will be taken to the individual features of the building and its special interest.</p>	<p>To ensure that the Plan id justified.</p>	<p>No change to HRA findings. No <i>'likely significant effects'</i></p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM266	427	12.10.19	<p>In conservation areas, basements will be supported where they should conserve or enhance the character, and appearance and overall significance of the conservation area. This is particularly relevant in relation to external visible features e.g. light wells and railings which may impact on the character of conservation areas. Further guidance and advice can be found in Merton's Basement and Subterranean, Design and Sustainable Drainage SPDs. Proposals which impact statutory listed and locally listed buildings will be assessed according to national policy and Policy D12.5 'Managing Heritage Assets'.</p>	To ensure that the Plan is justified and consistent with national policy relating to the conservation of heritage assets (section 16 NPPF).	No change to HRA findings. No 'likely significant effects'
MM267	428, 439, 441, 442, 460	Strategic policy EC13.1 part 3 and supporting text	<p><i>Capitalisation in policy and supporting text to indicate where Town Centres, District Centres, Town Centre Type Uses etc have specific planning meanings as defined in the glossary. E.g</i></p> <ul style="list-style-type: none"> a. Strengthening the NPPF's "town centre first approach" by encouraging a range of appropriate town centre uses, not limited to retail, that generate a larger number of journeys towards Wimbledon (Major Town Centres), Colliers Wood, Mitcham and Morden (District Town Centres); b. Supporting Local Town Centres and neighbourhood parades for businesses commensurate with the character of the area and providing services to local residents; c. Encouraging complementary businesses, services and activities in our Town Centres that will enhance their vitality and vibrancy of the centre, including uses that will add to the attraction of the Town Centres for all users and meet the changing needs and desires of all high street users; 	To ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM268	444	13.2.21	Proposals for new development or change of use should be compatible with the effectiveness of the SIL in accommodating	To ensure effectiveness and	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>the 24-hour operation of industrial type activities including</u> the amenity of neighbouring occupiers of buildings. If proposals are likely to conflict with the successful operation of existing businesses nearby or cause harm to the amenities of occupants of neighbouring buildings without any way of mitigation, planning permission will not be granted. Mitigation measures through design conditions or planning obligations may be sought to improve site access or minimise disruption to neighbouring businesses where necessary. <u>In line with the Agent of Change principle set out in the London Plan, the council will not support proposals in designated industrial areas that would curtail the industrial operations of existing businesses.</u></p>	<p>general conformity with the London Plan.</p>	<p>No 'likely significant effects'</p>
MM269	449	13.3.7	<p>13.3.7 To demonstrate that full and proper marketing has been undertaken to justify that the employment and community uses are no longer viable, the council requires the applicant to provide Marketing and Vacancy evidence in accordance with the criteria set out in the Appendices, for a minimum of 3018 months (21.5 years).</p>	<p>To ensure that the Policy is justified.</p>	<p>No change to HRA findings. No 'likely significant effects'</p>
MM270	449	13.3.9	<p>13.3.9 In circumstances where proposals for mixed use development are considered, proposals must be designed to <u>ensure optimise the likelihood of successful</u> future occupation and function of employment uses <u>once built.</u> 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 sites where these would prevent the successful operation of non-residential uses.</u> The premises/sites retained for employment uses must:....</p>	<p>To ensure that the Plan is effective, consistent with the Framework in terms of the 'Agent of Change' principle (paragraph 187 NPPF), and in general conformity with the London Plan.</p>	<p>No change to HRA findings. No 'likely significant effects'</p>
MM271	451	Policy EC13.4 (e) and supporting text paragraph	<p>e. Require the local employment strategy for major developments to cover procedures to ensure small and medium sized local enterprises have access to supply chain tender opportunities for the procurement of goods and services generated by the development both during and after construction;</p>	<p>To ensure that the Plan is justified.</p>	<p>No change to HRA findings. No 'likely significant effects'</p>

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			having regard to the council's Local Procurement Code of Practice.		
MM272	451	Policy EC13.4 (f)	(f) Demonstrate good practice when procuring its own goods and services by following the Public Services (Social Value) Act through Merton's Social Value Toolkit	To ensure that the Policy is justified and legally compliant insofar as it is required to set out policies relating to the development and use of land.	No change to HRA findings. No 'likely significant effects'
MM273	453	13.4.12	13.4.12 Our Social Value Toolkit has been designed to help council officers along with providers of council goods and services to understand what Social Value is in order to comply with legislation and be able to practically consider and achieve Social Value from commissioning and procurement activities. In doing so, we can help achieve positive outcomes and value for the Borough through the contracts we procure.	To ensure that the Policy is justified and legally compliant insofar as it is required to set out policies relating to the development and use of land.	No change to HRA findings. No 'likely significant effects'
MM274	454	Policy TC 13.5	3.6 Merton's <u>T</u> own <u>C</u> entre and <u>N</u> eighbourhood <u>P</u> arades This policy contributes towards maintaining and enhancing the attractiveness of <u>T</u> own <u>C</u> entres by encouraging more people to use these locations and promote a sharing and circular economy wherever possible. To maintain and improve the overall vitality and viability of Merton's <u>T</u> own <u>C</u> entres, the council will support new development in Merton's <u>T</u> own <u>C</u> entres and <u>N</u> eighbourhood <u>P</u> arades commensurate with their scale and function, providing it respects or improves the character and local environment.	To ensure that the Plan is clear and effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>All frontages in Merton's <u>Town Centre</u> and <u>Neighbourhood Parades</u>.</p> <p><u>A.</u> Supporting proposals for developments where: ...</p> <p>Within Wimbledon, Colliers Wood, Mitcham and Morden <u>Town Centres</u></p> <p><u>aB.</u> In addition to (a)<u>A.</u>, supporting proposals for developments that: ...</p> <p>ii) Provide a wide range of <u>Town Centre Type Uses</u> which contribute towards the vitality and viability of town centres including shopping, leisure, entertainment, cultural, community and offices.</p> <p><u>iii. 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 <u>Town Centres</u></p> <p><u>aC.</u> Supporting proposals: for development up to 1,000sqm per unit of floorspace for <u>Town Centre Type Uses</u> in the designated <u>Local Town Centre</u> of Arthur Road, Motspur Park, North Mitcham, Raynes Park and South Wimbledon.</p> <p>...</p> <p><u>iii that do not provide betting shops within the primary shopping area.</u></p> <p><u>And associated Main Modifications throughout the supporting text for EC13.5 on clarifying Town Centre, District Centre Neighbourhood Parade etc</u></p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM275	455	Policy TC13.5 under 'Within Local town centres' part a. i. and 13.5.22	<p>i. The council will resist major increases (above 1,000sqm) in town centre type use floorspace in local centres unless it contributes to the council's Good Growth regeneration objectives.</p> <p>13.5.22 Development that provides a major increase (over 1,000 sqm) of town centre type uses will not be supported in the local centres of Arthur Road, Motspur Park, North Mitcham, Raynes Park South Wimbledon and Wimbledon Village unless it contributes to the council's Good Growth regeneration objectives.</p>	To ensure that the Plan is effective.	No change to HRA findings. No 'likely significant effects'
MM276	455	Policy TC.13.5	<p>Within Neighbourhood Parades AD. Maintaining Neighbourhood Parades to provide convenience shopping and other services within walking distance of local residents. Large increases in commercial floorspace in neighbourhood parades will be resisted</p>	To ensure that the Policy is clear and that it avoids unnecessary repetition to ensure consistency with national policy in these terms (paragraph 16 NPPF).	No change to HRA findings. No 'likely significant effects'
MM277	457	13.5.8	<p>Betting shops and hot food takeaways (use identified as sui generis), are not compatible with the main retail or social function of the town centres and thus are not considered appropriate new uses outside of within the Primary Shopping Area of Merton's Town Centres.</p>	To ensure that the Policy is effective and clear.	No change to HRA findings. No 'likely significant effects'
MM278	461	13.5.31	<p>Neighbourhood parades are identified to ensure that local shopping facilities are retained within walking distance of residents to meet their day-to-day needs. As set out in the Table 13.5 "Merton's Town Centres", Neighbourhood Parades are not designated Town Centres and as such, large increases in commercial floorspace will be resisted in line with policy TC13.6</p>	To secure effectiveness and clarity.	No change to HRA findings. No 'likely significant effects'
MM279	464	Policy TC 13.6, 2nd paragraph	<p>A. The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment (required over</p>	To ensure consistency with	No change to HRA findings.

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			<p>280sqm net new floorspace) submitted is proportionate to the scale of the development proposed and satisfies the council's requirements.</p> <p>B. Local convenience development outside town centres meets all of the following criteria:</p> <p>...</p> <p>C. Vitality and viability of Merton's existing town centres would not be harmed. Planning conditions may be imposed on applications, to ensure that proposals do not have an adverse impact on the vitality and viability of existing town centres. Such conditions may:</p> <p>...</p>	national policy on ensuring the vitality of town centres and clarity (paragraph 16 and section 7 NPPF).	No 'likely significant effects'
MM280	465	13.6.5 (first sentence)	Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area of the new proposal exceeds 280sqm.	To ensure that the Plan is justified and clear.	No change to HRA findings. No 'likely significant effects'
MM281	465	13.6.5 (second sentence)	In accordance with the National Planning Policy Framework 2019 (NPPF 2021 paragraph 90 (MM2. 1), impact assessments will be required for leisure and office development above 2,500 sqm gross located outside town centres and not in accordance with the development plan.	For consistency with national policy.	No change to HRA findings. No 'likely significant effects'
MM282	467	Policy TC13.7 (b and c)	<p>b. Where there are no alternative convenience shops located within 400m, only permitting changes of use of a corner/local convenience shop to a wider range of uses including other shops, businesses, cafes and restaurants, public houses, health and community where criterion (a)(ii) and (iii) can be met and where:</p> <p>i. There are no alternative convenience shops located within 400 metres;</p> <p>ii. It can be demonstrated by full and proper marketing of the site for convenience use at reasonable prices for at least 12 months (1 years) and to the council's satisfaction that there is no realistic prospect of convenience use in the future.</p>	To ensure that the Policy is clear and effective.	No change to HRA findings. No 'likely significant effects'

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			<p>c. Only permitting the change of use of a corner/local convenience shop to residential where criteria (a) can be met and where:</p> <ul style="list-style-type: none"> i. There are no alternative convenience shops located within 400 metres; ii. It can be demonstrated by full and proper marketing of the site for convenience use at reasonable prices for at least 12 months (1 years) and to the council's satisfaction that there is no realistic prospect of convenience use in the future; and iii. An active frontage is provided. 		
MM283	470	Policy TC13.8(f)	<p>f. Proposals which result in <u>the development of more than three hot food takeaways in a shopping parade of 10 consecutive shops</u> an over-concentration of hot food takeaways will not <u>normally</u> be permitted as this would detract from the <u>viability and vitality of high streets and Town Centres and the ability to adopt healthy lifestyles.</u></p>	<p>For consistency with national policy insofar as the promotion of the vitality and viability of centres and to make clear the range of uses permitted in such locations (paragraph 86 NPPF) in an effective way..</p>	<p>No change to HRA findings. No <i>'likely significant effects'</i></p>
MM284	470	Policy TC13.8(g) and supporting text paragraph 13.8.11	<p>Policy TC13.9 (g) "The council will <u>not normally permit</u> manage and monitor proposals for new hot food takeaways found within 400 metres <u>walking distance from the entrance or exit of an existing or proposed</u> of the boundaries of a primary or secondary school to promote the availability of healthy food."</p> <p>13.8.11. "As set out in <u>the London Plan and</u> Policy HW<u>102.2</u> <i>Developing Healthy Places</i>, the council will look to create and promote a healthy environment in Merton. As such, when considering <u>the council will not normally permit</u> new development proposals for fast food takeaways located 400 metres from the exit and entrance of an existing or proposed school, the council will hav<u>ing</u> regard to the nature of the</p>	<p>For consistency with the London Plan policy E9(d), effectiveness and clarity.</p>	<p>No change to HRA findings. No <i>'likely significant effects'</i></p>

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			proposal, its contribution to healthy food availability and its relationship to the existing provision of hot food takeaway outlets and healthy eating initiatives taking place at the school. As set out in Policy HW102.2 Developing healthy places the council will encourage all new food establishments in Merton to sign up to the Healthy Catering Commitment.”		
Mm285	477	TC13.9.1(a)(i)	All proposals for cultural and tourism development which are likely to generate a large number of visitors in either Merton’s Major and District Town Centres or other areas of the borough which have high good levels of accessibility (PTAL level 3 or above) and are within close proximity to additional services for employees and visitors.	To secure clarity and effectiveness around use of town centres and “good” PTAL	No change to HRA findings. No <i>‘likely significant effects’</i>
MM286	477, 486	TC13.9, part e	Supporting proposals for the change of use from culture, arts and tourist accommodation to alternative uses only if it can be demonstrated to the council’s satisfaction that full and proper marketing of the site at reasonable prices for a period of 30-18 months (21.5 years) confirms the financial non- viability for these purposes, unless suitable replacement site for the culture and arts use which is of better standard and quality is provided locally; or, ii. Where it can be demonstrated that the existing tourist accommodation is no longer viable and does not provide facilities for the local community.	To secure clarity and for effectiveness, and to ensure that the Plan is justified.	No change to HRA findings. No <i>‘likely significant effects’</i>
MM287	481	Policy IN 14.1	<u>Require new development to comply with London Plan Policy DF1 (Delivery of the Plan and Planning Obligations) which, amongst other things sets out the approach to viability testing, decision making and infrastructure prioritisation (Parts B, C and D) that the Council will take where it has been demonstrated that planning obligations cannot viably be supported. On a site-specific basis this shall include consideration of the Council’s published Viability Study, the Mayor’s Affordable Housing and Viability SPG and that priority be given to affordable housing and necessary public transport improvements.</u>	To ensure that the Plan is justified, effective and in general conformity with the London Plan.	No change to HRA findings. No <i>‘likely significant effects’</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM288	484	14.1.15 - 14.1.18	<p>Water and Wastewater <u>Infrastructure</u></p> <p>14.1.14 To accommodate the expected population and housing growth across the borough, the council is supportive of improvements and upgrades to water supply and wastewater services, to contribute to security of supply.</p> <p>14.1.15 We The council will work with the water and wastewater providers companies <u>to help them develop and implement their plans, to</u> ensure that there is adequate water supply, surface water, foul drainage, <u>and</u> wastewater infrastructure and sewerage treatment capacity to serve all new developments. Developers will also need to agree details with water and wastewater companies for adequate water supply, surface water, foul drainage and sewerage treatment capacity.</p> <p><i>(new paragraph break)</i> Developers will be required to demonstrate as part of the planning application process that there is adequate capacity both on and off-site to serve the development and that the development would not lead to problems for existing users. In some circumstances this may make it necessary for developers to <u>will necessitate that developers carry out appropriate studies to ascertain the effect proposed development will have on the existing infrastructure. Overloading of the system will not be permitted.</u></p> <p><i>(new paragraph break)</i> Where there is a capacity problem the developer will be required to fund appropriate improvements to be completed prior to completion of the development. An exception to this may be where the water company has improvement works programmed in that align with the completion time of the development. The council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</p>	To avoid unnecessary duplication and thus secure consistency with national policy (paragraph 16 NPPF), and to ensure that the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>14.1.16 Thames Water and SES Water will work with developers and the council to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development.</p> <p>14.1.17 Developers are encouraged to contact the water and wastewater companies as early as possible to discuss their development proposals and intended delivery programme to assist operators with identifying any potential water and wastewater network reinforcement requirements.</p> <p>14.1.18 Where appropriate, planning permission for development which results in the need for off-site infrastructure upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. Where there is a capacity constraint, phasing conditions will be used as appropriate to ensure that any necessary infrastructure upgrades can be delivered ahead of the occupation of the relevant phase of a development.</p> <p>14.1.19 We are supportive of improvements to water supply or wastewater facilities, to ensure adequate long term water supply and wastewater management throughout the borough.</p>		
MM289	488	Policy IN14.2(e)(i) and 14.2.40	<p>i. It provides for an identified need</p> <p>14.2.40 We will support the development of new social and community infrastructure uses where there are identified gaps in provision <u>they address a local or strategic need, in line with London Plan Policy S1(C).</u></p>	To ensure general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'
MM290	505	New paragraphs below 15.1.2	<p><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 and</u></p>	To ensure consistency with national policy (section 13 NPPF) and secure general conformity with the London Plan insofar	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>listed in the Appendices 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></p> <p><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, changes to reflect the built form on site that has come forward through approved planning applications, which no longer protects the spatial or visual openness of the MOL, and some exceptional circumstances. These boundary changes to the Policies Map help to create strong, defensible and permanent boundaries and ensure consistency with the NPPF and London Plan. With reference to NPPF 140, further information on these boundary changes is provided in the Appendices.</u></p>	as MOL boundary alterations are concerned.	
MM291	511	Policy O15.3, part d	Require development to contribute to net gains in B 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 watercourse, natural banks and processes should be restored with a 10m buffer, where feasible.</u>	To ensure consistency with national policy relating to the conservation and enhancement of the natural environment (section 15 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>
MM292	511, 515	Policy O15.3, part f	Expect <u>Major</u> development on sites found in an area of deficiency in access to nature to <u>address the deficiency, where suitable and viable</u> incorporate appropriate B biodiversity elements and habitat features to improve nature conservation, and to improve accessibility to SINC's through site design.	To remove unnecessary requirements, secure clarity and to ensure that the policy is justified.	No change to HRA findings. No <i>'likely significant effects'</i>
MM293	515	New paragraph below 15.3.21	<u>The Environment Act 2021 introduces mandatory net biodiversity gain for all development, except those exempted, from November 2023. Applicants should refer to Natural England guidance, British Standard BS8683:2021: Process for</u>	For clarity and effectiveness, to highlight guidance	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>designing and implementing Biodiversity Net Gain and the latest version of the DEFRA biodiversity metric.</u>	for biodiversity net gain.	
MM294	517	Policy O15.4, part a	Encourage and support the protection of street trees, and secure appropriate replacements utilising current technological advancements for the successful growth and establishment of trees;	For clarity and to ensure that the plan is justified.	No change to HRA findings. No <i>'likely significant effects'</i>
MM295	517	Policy O15.4, part e and 15.4.5	<p>b. Ensure that development proposals protect and retain trees, hedges and other landscape features of amenity value, on site and on adjoining land, wherever possible, and secure suitable replacements in instances where their loss is justified;</p> <p><u>The loss of trees, hedges and other landscape features of amenity value, will only be justified when:</u></p> <ul style="list-style-type: none"> <u>i. Their removal would not have a significant negative impact on the local environment and its enjoyment by the public,</u> <u>ii. Their removal is necessary in the interest of good arboricultural practice; or</u> <u>iii. The benefits of the development outweigh the amenity value of any features that would be lost.</u> <p><u>In circumstances where i, ii or iii applies, suitable high-quality re-provision of equal value must be provided on site. Where on site provision is demonstrably not possible, as agreed with the council, a financial contribution of the full cost of appropriate re-provision will be required.</u></p> <p>c. Expect development proposals, where appropriate, to plant additional trees on site in a coordinated way to maximise the</p>	To ensure that the Policy is justified, effective and clear.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>green infrastructure network and to increase the borough's tree canopy;</p> <p>d. Use Tree Preservation Orders to safeguard significant trees of amenity value;</p> <p>e. Only permit development if it will not damage or destroy any tree which:</p> <p>i. is protected by a Tree Preservation Order;</p> <p>ii. is within a conservation area; or,</p> <p>iii. has significant amenity value.</p> <p>However, development may be permitted when:</p> <p>iv. The removal of the tree is necessary in the interest of good arboricultural practice; or</p> <p>v. The benefits of the development outweigh the tree's amenity value.</p> <p>In circumstances where e) iv. or v. applies, suitable high-quality re-provision of equal value must be provided on site. Where on site provision is demonstrably not possible, as agreed with the council, a financial contribution of the full cost of appropriate re-provision will be required.</p> <p>f. Expect proposals for new and replacement trees, hedges and landscape features of amenity value to consist of appropriate native species to the UK.</p> <p>...</p>		

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>15.4.5 We will use the existing planning mechanisms including Tree Preservation Orders and Conservation Area designations to protect existing trees on private land. Applicants should refer to the laws and guidance on Tree Preservation Orders, including Part VIII of the Town and Country Planning Act 1990, the Town and Country Planning (Tree Preservation)(England) Regulations 2012 and government guidance on Tree Preservation Orders and trees in conservation areas. These links provide the necessary information and requirements on trees that have Tree Preservation Orders and trees within conservation areas.</p>		
MM296	519	15.4.9	<p>Tree planting should be considered from the design stage of a proposal. The location of new trees should be planned to complement proposed features, have an appropriately sized tree pit, be bio-secure and be appropriate for the intended use, of the development. We may request details relating to the plannedlong-term maintenance for new trees and landscaping on development sites, to ensure planting becomes established, particularly within the first five years. Planning conditions will also be used, as appropriate.</p>	<p>For clarity and conformity with national policy (paragraph 131 NPPF), and to ensure that the Plan is justified.</p>	<p>No change to HRA findings. No <i>'likely significant effects'</i></p>
MM297	521	Policy O15.5, part c	<p>Strongly encourage support the inclusion of Uurban Greening for all other development in Merton.</p>	<p>For clarity and to ensure the plan is justified.</p>	<p>No change to HRA findings. No <i>'likely significant effects'</i></p>
MM298	524	Policy O15.6, part d and 15.6.10	<p>d. Support the protection and completion of the Wandle Trail, as shown on the 'Wandle Trail / National Cycle Network Route 20 (NCN20)' Policies Map and the Indicative Cycle Network' Policies Map.</p> <p>15.6.10 While most sections are in a good condition, there are some sections missing links and areas that will require future investment and improvement to enable a continuous trail that is fully accessible to all users, at all times of the year. We support the protection and completion of the Wandle Trail, including the</p>	<p>To ensure effectiveness and achieve clarity.</p>	<p>No change to HRA findings. No <i>'likely significant effects'</i></p>

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			<p>identified improvements in access required in the north east of the borough, near Earlsfield (<u>refer to Policy Maps ‘Wandle Trail / National Cycle Network Route 20 (NCN20)’ and ‘Indicative Cycling Network’ and Table 16.1). This includes the currently inaccessible section from Trewint Street to Ravensbury Terrace.</u> This will complete a missing link, and provide a safer, quieter and more pleasant alternative route for cyclists and pedestrians to the busy Durnsford Road bridge. <u>Completion of the Wandle Trail missing link will involve joint work between the boroughs of Merton and Wandsworth, the Environment Agency and National Rail, supported through Section 106 contributions already secured, other funding sources and the provision of access routes already secured through adjacent development sites.</u> Any improvements here would need to be agreed with the neighbouring borough of Wandsworth. Investment in the Wandle Trail should respect the character of the river’s environs and be designed for pedestrian and cycle access.</p>		
MM299	529	Policy F15.7 part e	<p>Work Deliver wastewater infrastructure improvements across the borough in partnership in <u>collaboratively</u> partnership with water companies to help <u>them</u> develop and implement their Drainage and Wastewater Management Plans (DWMPs) <u>to enable them to deliver water and wastewater infrastructure improvements across the borough.</u></p>	To ensure that the Policy is effective, and to secure consistency with national policy insofar as it requires plans to make sufficient provision for water supply and wastewater infrastructure (paragraph 20 NPPF).	No change to HRA findings. No <i>‘likely significant effects’</i>
MM300	530	15.7.5	Merton’s Local Flood Risk Management Strategy identifies Merton’s objectives and measures for how we will manage local flood risk, (defined as flooding from surface water, groundwater and ordinary watercourses) and it includes specific requirements	To ensure clarity.	No change to HRA findings. No <i>‘likely significant effects’</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p>with regards to about management of flood risk to and from development. Developers should ensure that development proposals meet the objectives and requirements identified in the Local Flood Risk Management Strategy.</p>		
MM301	539	15.8.14 and 15.8.15	<p>Water infrastructure</p> <p>15.8.14 — We will look to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will need to show that there is adequate capacity both on and off-site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out studies to learn the effect proposed development will have on the existing infrastructure. Overloading of the system will not be allowed.</p> <p>15.8.15 — Where there is a capacity problem the developer will need to fund improvements to be completed prior to completion of the development. An exception to this is where the water company has improvement works programmed in that fits with the completion time of the development.</p>	In the interests of effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>
MM302	539	15.8.16	<p>Basement and subterranean applications must ensure they are safe from flooding and do not increase risk to and from the site. We will only allow basements and other underground/subterranean development where:</p> <ul style="list-style-type: none"> • <u>As set out in other policies</u>, it can be proven it will not cause harm to the built and natural environment and local amenity including the local water environment, ground conditions and biodiversity. • <u>The basement does not result in an increased risk of flooding to other locations and is itself protected from flood risk from all sources including sewer flooding. The council will require installation of positively pumped devices to protect the basement from the risk of sewer flooding and to show the location of the pump device on the planning application drawings.</u> • The basement itself will be protected from flooding. 	To ensure that the Plan is clear and unambiguous.	No change to HRA findings. No <i>'likely significant effects'</i>

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			<ul style="list-style-type: none"> Positively pumped devices are installed to protect basements from the risk of sewer flooding. 		
MM303	539	15.8.17	<p>As required by policy D12.11, bBasement developments require the submission of more information in the form of a Basement Impact Assessment (BIA) <u>including site specific ground investigation, Drainage Strategy, an outline</u> Construction Method Statement (CMS) <u>and a Construction Traffic Management Plan</u> and Site-Specific Ground Investigation to provide us with a basis for deciding planning applications. Merton's Basement and Subterranean Development SPD provides guidance and sets out what needs to be demonstrated as part of an assessment.</p>	To ensure that the Plan is clear and unambiguous.	No change to HRA findings. No 'likely significant effects'
MM304	541	Policy F15.9 Sustainable Drainage Systems, 1 st paragraph	All major development must include water efficiency measures, to minimise water consumption such as rainwater harvesting or grey water recycling. <u>In addition, all major development must include</u> as well as Sustainable Drainage Systems (SUDS) to reduce surface water runoff to greenfield rates, and provide <u>multifunctional benefits unless there is clear evidence that this would be inappropriate</u> biodiversity, urban greening, amenity and water quality benefits.	To ensure that the Policy is justified and to achieve consistency with national policy relating to sustainable drainage systems (paragraph 169 NPPF).	No change to HRA findings. No 'likely significant effects'
MM305	541	Policy F15.9 Sustainable Drainage Systems, part a	Seeking mitigating measures against the impact of flooding from all sources and ensure all new development, including all basement and subterranean development, implements appropriate SUDS and show sustainable approaches to the management of surface water in line with the Non-Statutory Technical Standards for SUDS.	To ensure that the policy is justified, clear and avoids unnecessary repetition, and thus ensuring consistency with national policy (paragraph 16 NPPF).	No change to HRA findings. No 'likely significant effects'
MM306	541	Policy F15.9 Sustainable Drainage Systems, part b	Ensuring developers <u>demonstrate</u> prove the maintenance and long-term management of <u>the site's drainage scheme will take place for the lifetime of the development. This must be</u>	To ensure that the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'

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			addressed perpetuity SUDS through a SUDS Maintenance and Management Plan submitted as part of the planning process.		
MM307	541	Policy F15.9 Sustainable Drainage Systems, part d	Requiring the retention of soft landscaping and green spaces permeable surfaces in existing gardens where possible . For example, all new driveways or parking areas associated with development should be made of permeable materials in line with permitted development rights.	To ensure that the Policy is justified.	No change to HRA findings. No 'likely significant effects'
MM308	544	Policy15.10 name	<u>Policy P15.10 Improving Air Quality, and Minimising Pollution and Land stability</u>	Policy name changed to ensure clarity and effectiveness of the Plan.	No change to HRA findings. No 'likely significant effects'
MM309	544, 547	Policy P15.10 Improving Air Quality and Minimising Pollution, part b Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts. <u>Appropriate site investigations and reports on pollution, contamination, and land stability, prepared by a competent and accredited professional, must be made available and submitted to the Local Planning Authority to inform the assessments set out in this policy.</u>	To ensure that sites are suitable for proposed uses taking account of ground conditions and any risks arising from land stability or contamination in accordance with national policy (paragraphs 183 to 188 NPPF).	No change to HRA findings. No 'likely significant effects'
MM310	544	Policy P15.10 Improving Air Quality and Minimising Pollution, parts cc and dd to move to below part b	cc. <u>The design and layout of new development must endeavour to minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Any noise and polluting activities or features such a plant equipment should be located away from areas of high pollution and sensitive land uses (such as schools, nurseries, play spaces, hospitals and residential dwellings) where possible to ensure that there are no detrimental impacts on living conditions, health and wellbeing or local amenity.</u>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>dd. Where there are already significant adverse effects on the environment or amenity due to pollution, sensitive uses should be steered away from such areas. However, given the limited availability of land for development in the borough, this will not always be possible. Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.</u></p>		
MM311	544	Policy P15.10 Improving Air Quality and Minimising Pollution, part e and g	<p>e. Development proposals in Air Quality Focus Areas (AQFAs) or development proposal that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to, minimise exposure following London Plan policy SI 1: <i>Improving air quality.</i></p> <p>g. Development proposals must consider the impact of air quality. An Air Quality Impact Assessment will be required for proposals introducing new developments in areas already subject to poor air, major developments, developments involving biomass boilers, biomass or gas CHP (including connections to existing networks where the increased capacity is not already covered in an existing AQA), substantial earthworks or demolition and any development that could have a significant impact on air quality, either directly or indirectly. The following will be needed:</p> <p>i. ...</p> <p>iv. Strict Mitigation for developments to be used by sensitive receptors such as schools, hospitals, care homes, areas of deprivation and in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors.</p> <p>v. ...</p>	To ensure that the Plan is effective and justified.	No change to HRA findings. No ' <i>likely significant effects</i> '

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM312	545	Policy P15.10 Improving Air Quality and Minimising Pollution, part 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 have regard to the London Plan Air Quality Neutral guidance (section 5).</u>	To ensure effectiveness.	No change to HRA findings. No 'likely significant effects'
MM313	547 – 548 (supporting text starts on page 547).	Policy P15.10 Improving Air Quality Minimising Pollution and Land stability parts aa and bb	<p>aa. For major development, applicants should must show how they have considered had regard to Merton's Air Quality Action Plan, Merton's emerging Air Quality Supplementary Planning Document, Merton's emerging the Non-Road Mobile Machinery (NRMM) Practical Guide, Dust Controls and Logistics Planning, from the earliest stage in the design and construction method of their development and its <u>construction method.</u></p> <p>bb. Construction and demolition sites must ensure silt does not enter the local drainage systems or watercourses and is carefully controlled and managed on site to prevent pollution and environmental damage.</p> <p>i. Its essential construction and demolition sites have <u>regard to</u> follow the Right Waste Right Place guidance and Waste Management Duty of care of practice to ensure construction and demolition waste be managed correctly to prevent pollution and miss description of waste.</p> <p>ii. Pollution incidents should must be reported to Environment Agency 24-hour incident hotline</p> <p>iii. Vacant development sites should must introduce increased security measures such as high security fencing/ concrete bollards and 24-hour security to prevent trespassing and illegal waste operators moving into</p>	To ensure that the Policy is justified and clear.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			vacant development sites to deposit large amount of fly tipping and then abandon sites. <i>Justification</i>		
MM314	549	New paragraph before 15.10.1	<u>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>	To ensure general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'
MM315	549	New paragraphs below 15.10.2	<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 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> <p><u>The Environment Bill delivers key aspects of our Clean Air Strategy with the aim of maximising health benefits for all and sits alongside wider government action on air quality. The Environment Bill will deliver cleaner air for all by requiring the government to set targets on air quality, including for fine particulate matter, the most damaging pollutant to human health.</u></p> <p><u>Councils and other relevant public bodies will be required to work together more closely to tackle local air quality issues,</u></p>	To ensure that the Plan is justified. .	No change to HRA findings. No 'likely significant effects'

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			<p><u>and it will be easier for local authorities to enforce restrictions on smoke emissions from domestic burning, which pollutes our towns and cities. In addition, the Bill gives the government the power to make vehicle manufacturers recall vehicles if they do not comply with relevant environmental standards, ensuring illegally polluting vehicles are taken off the road quickly.</u></p> <p><u>The Bill introduces a legally binding duty on the government to bring forward at least two air quality targets by October 2022. The first is to reduce the annual average level of fine particulate matter (PM2.5) in ambient air. This will deliver substantial public health benefits.</u></p> <p><u>The second air quality target must be a long-term target (set a minimum of 15 years in the future), which will encourage long-term investment and provide certainty for businesses and other stakeholders. The environmental targets policy paper published in August 2020 outlined the proposal to break new ground and focus this target on reducing population exposure to PM2.5.</u></p> <p><u>The principle of a population exposure reduction target is to prioritise action that is most beneficial for public health and drive continuous improvement. This target will drive improvement across all areas of the country; even in areas that already meet the new minimum standard for PM2.5. This approach recognises there is no safe level or standard of PM2.5.</u></p> <p><u>A new concentration target for PM2.5 will act as a minimum standard across the country, and a population exposure reduction target (PERT) will prioritise action to secure the biggest public health benefits drive continuous improvement across the whole country, not just in pollution hotspots.</u></p>		

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MM316	549	15.10.3 and 15.10.4	<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>	To ensure that the Plan is clear and unambiguous.	No change to HRA findings. No 'likely significant effects'
MM317	550	New paragraph before 15.10.5	<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>	To ensure that the Plan is clear.	No change to HRA findings. No 'likely significant effects'
MM318	550	New paragraph below 15.10.7	<u>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 Planning Document (SPD) provides further details on for AQA and what; we expect to be provided within an AQA. The assessment should provide decision makers with sufficient information to understand the scale and geographic scope of any detrimental, or beneficial impacts on air quality and enable them to exercise their professional judgement in deciding whether the impacts are acceptable, in line with best practice.</u>	To ensure clarity and to achieve consistency with national policy insofar as it expects local planning authorities to encourage other parties to take maximum advantage of the pre-application stage (paragraph 40 NPPF).	No change to HRA findings. No 'likely significant effects'

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MM319	550	15.10.9	<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. <u>The process and calculation for this are set out in Section 5.2 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD).</u></p>	In the interests of clarity and effectiveness.	No change to HRA findings. No <i>'likely significant effects'</i>
MM320	553	New para after 15.10.23	<p><u>Merton Council will be producing a Noise and Vibration Supplementary Planning Document (SPD). It will provide further guidance on the implementation of Merton's Local Plan policy relating to noise and vibration, provide technical guidance for noise mitigation and measures and sets out Merton's noise assessment requirements.</u></p>	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM321	554	15.10.28	<p>As part of the development process, we require that steps be taken to ensure that any impact is considered carefully, and that mitigation is in place to manage these types of emissions. Applicants will be need to apply the Department for Environment, Food and Rural Affairs' (DEFRA) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems. Control of Odour and Noise from Commercial Kitchen Exhaust Systems <u>(prepared by NETCEN for the Department for Environment, Food and Rural Affairs).</u></p>	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>

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MM322	556	15.10.40	As part of our commitment to better air quality, we will also ask, through planning conditions , that the current regulations relating to Non-Road Mobile Machinery (NRMM) be imposed where necessary. are applied through planning conditions.	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM323	559	Strategic Policy T16.1 Sustainable Travel, part e.	Seek to Encourage the management of vehicle use and parking to improve road safety outcomes and, reduce traffic dominance and minimise impact on the transport network.	To ensure that the Policy is justified and effective.	No change to HRA findings. No 'likely significant effects'
MM324	560	16.1.2	As set out in the The Mayor's Transport Strategy and the Government's Decarbonising Transport Strategy , the only realistic way to address some of the transport challenges problems is to reduce set out the overarching policy framework and strategic approach to transport which focuses on reducing dependency on cars in favour of active, efficient and sustainable modes of travel.	To ensure that the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'
MM325	563	Policy T16.2 Prioritising active travel choices, part d	Provide secure, covered cycle parking facilities that meet in accordance with London Plan minimum standards (higher level requirements) and are designed to a high standard, having regard to the London Cycle Design Standards. Facilities should include provision for charging of electric cycles and a minimum of 5% of cycle spaces should accommodate users of non-standard cycles.	To ensure that the Plan is justified.	No change to HRA findings. No 'likely significant effects'
MM326	563, 566	Policy T16.2 Prioritising active travel choices, part f	Make provision for or a contribution towards publicly accessible cycle parking and deckless cycle and scooter hire schemes where required.	To ensure that the Policy is justified and effective.	No change to HRA findings. No 'likely significant effects'
MM327	564	17.2.3	The Mayor's Transport Strategy sets a target for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041. However, only around a third of Merton residents do 20 minutes of active travel a day and worryingly, there has been a slight decline over the last five years. The	To ensure that the Plan is clear and effective.	No change to HRA findings. No 'likely significant effects'

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			<p><u>Government's decarbonising transport strategy sets out the aim that half of all journeys in towns and cities will be cycled or walked by 2030.</u> Approximately 30% of Merton residents' daily trips are already conducted by walking but less than 2% by bicycle. <u>TfL research indicates that a significant number of existing short car journeys in Merton could potentially be made by walking or cycling.</u> Merton is a relatively small borough with a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling. There is significant opportunity for more cycle and walking journeys, particularly for shorter trips.</p>		
MM328	564	New paragraph created using some wording from 17.2.4 and some additional wording.	<p>...There are pleasant, traffic free walking and cycling routes though the Borough's parks and open spaces that enable active travel choices by connecting key destinations via convenient shortcuts. In particular the Wandle Trail provides a major active travel route across the borough that connects neighbourhoods including Morden and Colliers Wood.</p> <p><u>It is, however, recognised that cycle and pedestrian provision in Merton is not of adequate standard in all areas and that significant barriers still exist to cycle and pedestrian journeys, particularly through the severance created by busy roads.</u> We will work with Transport for London, developers and other partners to make further improvements over the plan period with the eat aim of providing comprehensive cycling and walking networks that enable active travel choices to be made. <u>In order to contribute to the aim set out in the Government's decarbonising transport strategy, to deliver a world class cycling and walking network in England by 2040, Merton will produce cycling and walking strategies in 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period.</u></p>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM329	565	17.2.5	Development proposals should <u>must demonstrate through their Transport Assessment or Statement that sites are accessible</u>	To ensure clarity and effectiveness.	No change to HRA findings.

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			<p><u>by walking and cycling in accordance with TfL’s Healthy Streets Approach. An Active Travel Zone (ATZ) assessment should be conducted in accordance with TfL guidance which assesses and identifies</u> maximise opportunities to integrate with and improve cycling and walking networks including through. <u>ATZ assessments should particularly consider opportunities to improve cycle routes identified on the indicative cycle network map which shows cycling desire lines and potential routes that could form part of a future comprehensive cycle network to be delivered by the end of the plan period. Some sections of the network already have existing high quality cycle facilities in place and routes on the quieter roads will require minimal intervention. However, some routes will require significant intervention or further improvement to achieve the standard required. Developers should refer to Merton’s and TfL’s latest cycle route network maps and transport/ cycling strategies for further information on existing and planned routes and seek to consult at an early stage to discuss any requirements in relation to the cycle or pedestrian networks.</u></p>		<p>No ‘likely significant effects’</p>
MM330	565	17.2.6	<p><u>Developments may be required to make</u> financial contributions <u>to cycling or walking schemes</u> and/ or providing <u>new</u> routes across development sites. <u>Any existing cycle or walking routes on or adjacent to development sites should, be fully protected, including during construction phase, and opportunities should be sought to improve and upgrade routes as part of the development proposals.</u> Development layouts should <u>must</u> be designed to give priority to pedestrian and cycle movements, and should facilitate access to public transport networks <u>and be designed in accordance with the Healthy Streets approach. New development should, where appropriate, seek to restrict traffic dominance by adopting the principles of low traffic neighbourhoods and filtered permeability into the site layouts and should integrate with</u></p>	<p>To ensure clarity and effectiveness.</p>	<p>No change to HRA findings. No ‘likely significant effects’</p>

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			<p><u>and contribute towards any new or existing low traffic schemes on the surrounding street network.</u> Proposals for gated developments that prevent public access through development sites by cyclists and pedestrians, will be resisted <u>not be permitted.</u> <u>New and improved street layouts including pedestrian and cycle-infrastructure must</u> be provided to a high standard <u>with regard to</u> in accordance with the latest best practice design guidance <u>and requirements including;</u> DfT Cycle infrastructure design LTN 1/20, Manual for Streets and TfL Streets Toolkit, Streetscape Guidance, London Cycling Design Standards, TfL Healthy Streets Approach and Healthy streets check for designers.</p>		
MM331	567	Policy T16.3 Managing the transport impacts of development, part b	<p>Demonstrate that proposals will not result in any detrimental impact on road safety <u>can be mitigated to an acceptable degree</u> in accordance with <u>regard to</u> The Mayor's Vision Zero target for road safety.</p>	To ensure that the Policy is justified and effective.	No change to HRA findings. No 'likely significant effects'
MM332	567	Policy T16.3 Managing the transport impacts of development, part c	<p><u>Demonstrate how trips generated by the development will be managed to maximise sustainable travel patterns and reduce reliance on vehicle trips. Developments that are expected to generate a significant number of trips, as determined on a case-by-case basis, will be required to</u> develop a Travel Plan. where appropriate and in accordance with <u>regard to</u> TfL's latest guidance, which sets out a strategy for managing trips to the development to maximise sustainable travel patterns.</p>	To ensure that the Plan is justified and effective.	No change to HRA findings. No 'likely significant effects'
MM333	567	Policy T16.3 Managing the transport impacts of development, part e	<p>Demonstrate in accordance with TfL's latest Construction Logistics Plan guidance, how any impacts on the transport network during the construction phase of the development will be managed and mitigated, with priority given to maintaining safe and inclusive access for pedestrians, cyclists and public transport users. <u>Developments that will have an impact on the transport network during construction will be required to develop a Construction Logistics Plan, informed by TfL's latest</u> Construction Logistics Planning guidance.</p>	To ensure that the Policy is justified.	No change to HRA findings. No 'likely significant effects'

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MM334	567	Policy T16.3 Managing the transport impacts of development, part f	Demonstrate that the proposals and site layout make adequate provision for <u>safe and suitable access to the site for all users.</u> particularly emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups.	To ensure consistency with national policy.	No change to HRA findings. No <i>'likely significant effects'</i>
MM335	567	Policy T16.3 Managing the transport impacts of development, part g	<p>f. Demonstrate that the proposals and site layout make adequate provision for <u>safe and suitable access to the site for all users.</u> particularly emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups.</p> <p>g. <u>Demonstrate that the development will adequately</u> fFacilitate efficient, safe and low-emission delivery and servicing trips <u>and where a significant number of delivery trips are expected to be generated, develop a Delivery and Servicing Plan</u> in accordance <u>with regard to</u> TfL's latest guidance on Delivery and Servicing Plans.</p>	To ensure that the Plan is justified and consistent with national policy.	No change to HRA findings. No <i>'likely significant effects'</i>
MM336	568	17.3.5	Developments that will be expected to generate a significant amount <u>number</u> of journeys to the site by employees, visitors, <u>students</u> or residents should also submit a travel plan in accordance with TfL's <u>advice and guidance on Travel Plans.</u> latest guidance. A travel plan is a strategy for managing travel to a site through the introduction of a package of measures that support sustainable travel choices. <u>Developers should seek to engage with the Council and TfL at an early stage of the planning process to discuss the specific requirements for a travel plan which will be dependent on the type, scale, location and transport accessibility of the development. The travel plan will be required to be monitored over a period of at least five years to ensure the development is meeting targets in relation to sustainable travel. To support this the Council will seek to secure a travel plan monitoring fee via S106 agreement for all developments that are required to submit a travel plan.</u>	To ensure effectiveness and so that the Plan sets out the contributions expected from development and encourages pre-application engagement thus securing consistency with national policy (paragraphs 34, 40 NPPF).	No change to HRA findings. No <i>'likely significant effects'</i>

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MM337	569	17.3.6	...Development proposals should therefore seek engagement at an early stage of the planning process and set out proposals to ensure that the construction phase it is adequately managed and that risks to the operation and safety of the transport network are mitigated. <u>Proposals should also demonstrate that the transport impacts of the construction phase have been mitigated to maximise sustainability and reduce local air pollution, including through the use of rail or river (via The Thames) freight for significant developments where feasible.</u>	To ensure that the Plan is effective in terms of ensuring that appropriate opportunities to promote sustainable transport modes can be taken up.	No change to HRA findings. No <i>'likely significant effects'</i>
MM338	571	Policy T16.4 Parking and Low Emissions Vehicles, part a.	Developments should provide the minimum level of car parking necessary taking into consideration the site accessibility by public transport (PTAL), in accordance with London Plan parking standards. Developments in areas with good public transport accessibility, including Town eCentres and all locations with a PTAL rating of 5 to 6 , will be expected to be car free.	To ensure general conformity with the London Plan.	No change to HRA findings. No <i>'likely significant effects'</i>
MM339	571, 572	Policy T16.4 Parking and Low Emissions Vehicles, part b	All new development in Controlled Parking Zones, including conversions to multiple dwellings, will be required to be permit free, with all future occupants of that development being ineligible for on-street parking permits.	In the interests of clarity.	No change to HRA findings. No <i>'likely significant effects'</i>
MM340	571, 573	Policy T16.4 Parking and Low Emissions Vehicles, part d.	Disabled persons' parking should be provided in accordance with London Plan standards and should meet design guidelines , be accommodated within the development site where possible and be provided with electric vehicle charge points.	To ensure that the Policy is justified and effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM341	571	Policy T16.4 Parking and Low Emissions Vehicles, part e.	Development that provides on-site parking provision must provide electric vehicle charging infrastructure which is appropriate to the scale and type of development and which meets or exceeds requirements set out in Building Regulations Approved Document S and the in accordance with London Plan standards. The proposals must set out a strategy for the ongoing operation, management and maintenance of the EV charging infrastructure.	To ensure that the Policy is effective.	No change to HRA findings. No <i>'likely significant effects'</i>
MM342	571	Policy T16.4 Parking and Low	Residential developments that provide parking will be expected to support car club use as an alternative to car ownership, by funding a free trial use package for new residents for at least 3	To ensure effectiveness and	No change to HRA findings.

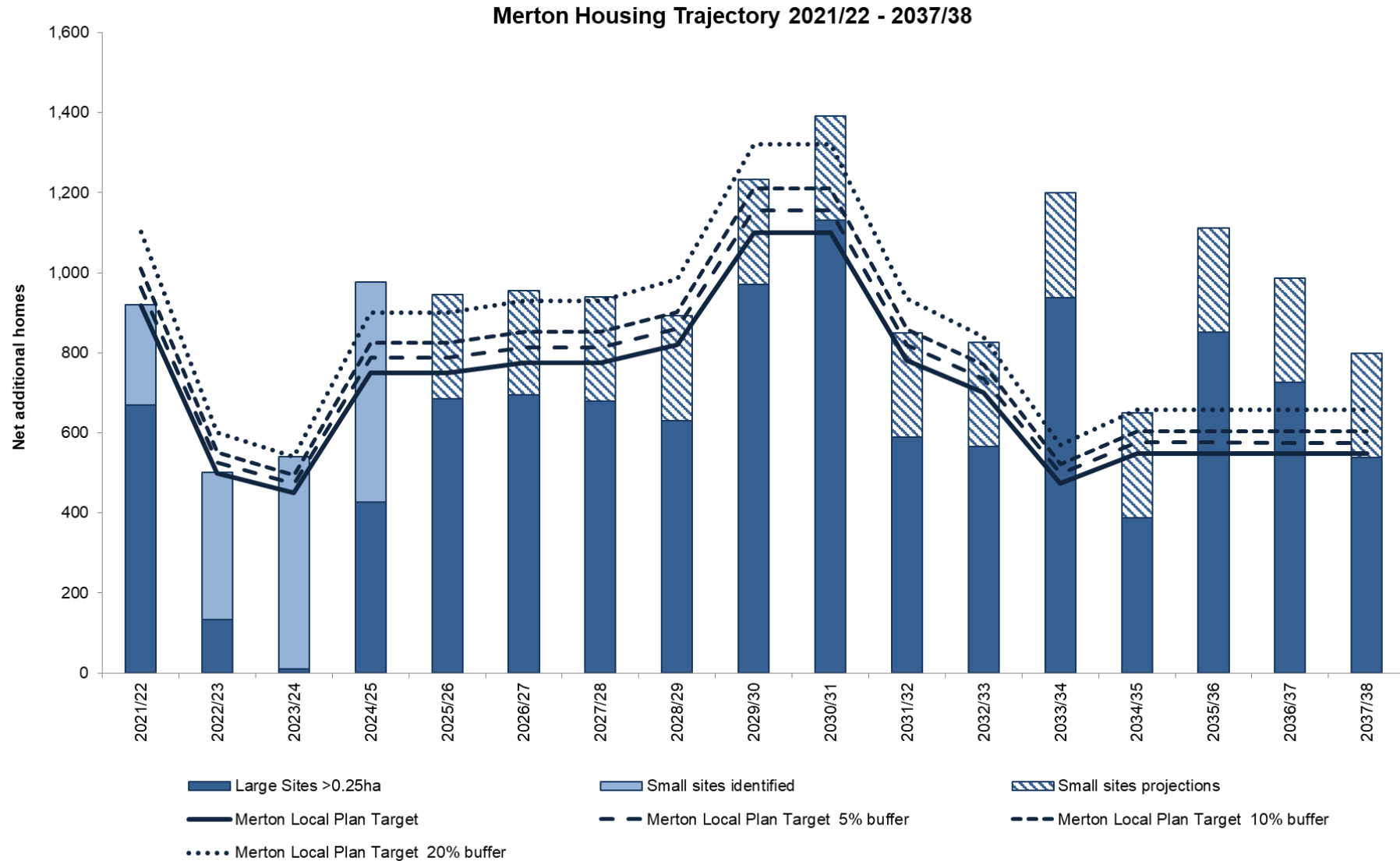
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
		Emissions Vehicles, part f.	years. Where appropriate and by allocating on-site parking space should be allocated to an appropriate number of car club vehicles where appropriate which will be provided with electric vehicle charging infrastructure and be included within the London Plan maximum parking standards.	general conformity with the London Plan.	No 'likely significant effects'
MM343	571	Policy T16.4 Parking and Low Emissions Vehicles, part g.	Development that provides any new provision or an amended layout of on-site car parking provision, should demonstrate that the proposals do not compromise highway safety, pedestrian amenity or increase flood risk. Any developments providing multiple or communal car parking spaces will be required to submit a how it will be designed and sustainably managed in accordance with TfL's latest Parking Design and Management Plan guidance.	To ensure that the Policy is justified and effective.	No change to HRA findings. No 'likely significant effects'
MM344	572	17.4.5	The conversion of front gardens to parking could be viewed as supporting increased car use in contradiction to car free development. However, new off-street parking for existing dwellings may relieve existing on-street parking pressures, release kerb space for other sustainable transport uses and better enable residents to charge an EV (Electric Vehicle), so support a transition to low-emissions vehicles. We will therefore not object provided proposals do not compromise highway safety and do not contribute to flood risk by ensuring surfacing materials are permeable (see Merton's guidance on vehicle crossovers and the flood risk policies in this Local Plan and Merton's Sustainable Drainage SPD for further policy direction and guidance on managing water runoff and flood risk).	To ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM345	573	17.4.7	It is essential that disabled parking facilities are fully accommodated on site wherever possible and should be incorporated within the overall design at feasibility stage. The layout of the d Disabled parking provision should be designed in accordance with recognised design standards to be conveniently located, and provide adequate access space and be provided in accordance with recognised requirements and design standards set out in London Plan Policies T6, T6.1, T6.5. In	To achieve clarity and general conformity with the London Plan.	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM346	573	17.4.9	<p>very exceptional circumstances...</p> <p>Car parking layouts and spaces should be well-designed to provide adequate space and ensure highway safety in accordance with the latest best practice design guidance and standards. Proposals for the management of parking provision should align with Merton's strategic approach for managing parking including through emissions-based parking charges. Specifically, residential parking spaces should not be bought outright but leased on a regular basis (maximum annually). Employee and shopper parking should be charged appropriately. Parking charges should ideally be varied to reflect vehicle emissions with low emissions vehicles such as EVs being charged a lower rate. <u>To ensure highway safety and protect pedestrian amenity, any proposals to create off-street parking and driveways which require the provision of a new access from the highway, will be required to apply for a dropped kerb in accordance with requirements set out in Merton's vehicle crossover information pack. To mitigate flood risk, any new or amended off-street parking facilities, including gardens converted to driveways, must take measures to reduce surface water run-off, such as the use of permeable materials and SUDS, in accordance with policy F15.9d and Merton's Sustainable Drainage Design and Evaluation Guide</u></p>	To ensure that the Plan is clear.	No change to HRA findings. No 'likely significant effects'
MM347	574	17.4.14	<p>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.</p>	In the interests of clarity.	No change to HRA findings. No 'likely significant effects'
MM348	575	New paragraph below 17.4.15	<p><u>Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles sets out detailed requirements</u></p>	In the interests of clarity and to ensure	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<p><u>and technical standards that should be applied in relation to the provision of EV charging for residential and non-residential buildings that are new or undergoing major renovation or change of use. The amount of charge points provided should be in accordance with whichever is the higher applicable standard of the Building Regulations Approved Document S and London Plan (Policy T6 including T6.1- T6.4) or the latest applicable standard. Developments not covered adequately covered by these standards or where a higher level of requirement has been identified may also be required to provide an additional amount or specific type EV charging infrastructure. For example, developments generating trips by a high number of taxis or large operational vehicles may have specific requirements for rapid charging infrastructure. 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 public car parking facilities, such as at retail facilities, EV infrastructure should include conveniently located fast or rapid charging facilities that enable the public to pay to charge their vehicle.</p>	<p>that the Policy is effective and justified in the context of updated Building Regulations requirements.</p>	<p>No 'likely significant effects'</p>
MM349	577	17.4.15	<p>New development that provides parking provision must provide electric vehicle charging infrastructure appropriate to the scale and type of development which will include active provision for at least 20% of spaces and passive provision for all car parking spaces to enable future installation to meet increased demand for EV charging. <u>Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it. For residential and office development slow charge points are usually adequate. For public car parking facilities, such as, retail and destination car parking facilities,</u> EV infrastructure should include conveniently located fast or rapid charging facilities that enable the public to pay to charge their</p>	<p>To ensure clarity and effectiveness.</p>	<p>No change to HRA findings. No 'likely significant effects'</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<u>vehicle on a “pay as you go” basis. EV charging infrastructure requires ongoing maintenance and operational management, so arrangements in relation to this should be set out within proposals, including within any Parking Design and Management plan.</u>		
MM350	After page 582	Insert new policy chapter M17.1 Monitoring	<i>Refer to Appendix 3 for new policy wording</i>	To ensure that the Plan is effective.	No change to HRA findings. No ‘likely significant effects’
MM351	After page 583	After the Appendices title page, insert a new initial appendix ‘Table showing which Development Plan policies are superseded by this Local Plan’	<i>[See Appendix 4 to this Schedule of Main Modifications for details]</i>	To secure compliance with regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012	No change to HRA findings. No ‘likely significant effects’
MM352	597	Table ‘Sites of Special Scientific Interest (‘European Sites’)’	<u>Sites of Special Scientific Interest (‘European Sites’) and Special Areas of Conservation (SAC)</u> [in table] Site: <u>SSSI and SAC</u>	For clarity and accuracy and for consistency with national policy.	No change to HRA findings. No ‘likely significant effects’
MM353	After page 602	After the ‘Green Corridors’ appendix, insert a new appendix.	<i>[See MM Appendix 5 – Metropolitan Open Land (MOL) - boundary amendments and exceptional circumstances]</i>	To ensure consistency with national policy (paragraph 140 NPPF).	No change to HRA findings. No ‘likely significant effects’
MM354	636	New glossary term after Affordable Housing	<u>The surface reflectivity of the sun’s radiation.</u>	To ensure clarity.	No change to HRA findings. No ‘likely significant effects’

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM355	636	New glossary term after Affordable Housing	<u>Amenity</u> <u>Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.</u>	To ensure clarity	No change to HRA findings. No 'likely significant effects'
MM356	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 ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM357	658	Glossary	<u>Public Transport Accessibility Level (PTAL)</u> This is a measure of accessibility to the public transport network. For any given point in London, PTALs combine walk time to the network (stations, bus stops) with service wait time at these stops to give an overall accessibility index. This can be allocated to six accessibility levels with one being poor and six being excellent. <u>For Merton, good public transport accessibility ranges between PTAL 3 and 4. For sites within PTAL 3, site circumstances such as the opportunities and services reachable through the nearest public transport network should be taken into account when determining whether access to public transport is good for that particular site. Transport for London provide the most up-to-date PTAL assessment via www.tfl.gov.uk/WebCAT</u>	To ensure clarity.	No change to HRA findings. No 'likely significant effects'
MM358	660	New glossary term after Scheduled Ancient Monument	<u>Significance (heritage)</u> <u>The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.</u>	To ensure clarity and consistency with national policy (section 16 NPPF).	No change to HRA findings. No 'likely significant effects'





Chapter 17. MONITORING

Policy M17.1 Monitoring

- a) **Merton Council will demonstrate the delivery of the Local Plan's spatial vision and strategic objectives by monitoring the implementation of policies and infrastructure.**
- b) **In the event that delivery falls significantly below what is required to achieve the necessary targets, or should housing and accommodation need figures change significantly, the Council will trigger a full or partial review of the plan.**

Supporting Text

Monitoring framework

- 17.1.1. **Monitoring the Local Plan is crucial to the successful delivery of its vision and strategic objectives. 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.**
- 17.1.2. **Monitoring is required to ensure that the Local Plan is effective. It also allows us to understand whether policies have worked as they were intended. The monitoring period will be implemented from the first year of adoption.**
- 17.1.3. **The monitoring framework table sets out the monitoring indicators for the Local Plan, which will be reported annually in the Authority Monitoring Report (AMR). The AMR is not the only monitoring tool. There are separate monitoring arrangements related to other council strategies, for example, the climate change strategy and action plan, and the South London Waste Plan.**
- 17.1.4. **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. Local Plan monitoring framework.**
- 17.1.5. **Should monitoring indicate Local Plan policies are not being implemented as intended or site allocation are not being delivered; the council will take appropriate action to resolve the issue(s). This may involve:**
 - **Producing Supplementary Planning Documents (SPD) and other relevant guidance to provide more detail of how policies should be implemented.**

Developing further working relationships with various partners across public, private and voluntary sectors to look at ways to facilitate implementation, including potential alternative forms of funding.

- Continuing to work with adjoining local authorities and agencies to address cross-boundary development needs.
- Reviewing capacity forecasts to make sure they reflect up-to-date guidance and any future changes to population and household growth.
- Holding discussions with developers and landowners to identify barriers for delivery.
- Reviewing site allocations to make sure there is an adequate supply of new homes, new jobs opportunities and delivery of supporting infrastructure to meet future needs.
- Considering Compulsory Purchase Orders (CPO) powers.

17.1.6. The Monitoring Framework table below, identifies the monitoring indicators which will monitor the effectiveness and performance of the Local Plan. This will be reported annually in Merton's [Authority Monitoring Report \(AMR\)](#). All indicators and targets will be subject to periodic review through the monitoring process.

Triggers for a local plan review

17.1.7. As set out in paragraph 33 of NPPF 2021 and draft NPPF 2023 policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Potential triggers for a partial or full review are:

- Housing completions fall more than 20% beneath the targets in the housing trajectory over any rolling 3-year period.
- Any significant revisions or updates to the London Plan where it proposes different approaches to the delivery of growth within Merton, including in terms of the borough's overall housing target.
- Significant changes to accommodation need figures including those relating to the Traveller community.
- Economic factors which may restrict the ability of developers or public bodies to provide affordable housing or contributions towards infrastructure that may impede the timely delivery of development of the allocated sites.
- Changes in the availability of public funding which might restrict the delivery of supporting infrastructure or could prevent some sites from being able to come forward for development.
- Technological change such as changes in building methods or the continuing advance of online retailing which will have significant implications for the future of Merton's town centres.

- Increase in the % of appeals where design policies are cited.

17.1.8. Any review (partial or full) will determine whether the Local Plan needs to be updated. If required, any update is required to be in conformity with national and regional planning policies.

17.1.9. The table below identifies the key monitoring indicators and targets which will monitor the effectiveness of the Local Plan in the Authority Monitoring Report (AMR). All indicators and targets will be subject to periodic review through the monitoring process.

Local Plan Monitoring Framework

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
1. <u>Site Allocations</u>	a. <u>Progress towards delivery of site within timescales.</u>	i. <u>Delivery within set delivery timescale</u>	1) <u>No identified delivery progress within 5 years of the start of the site deliverability period.</u>	a) <u>Council to consider the reasons for non-delivery and take action where appropriate.</u> b) <u>Actions could include: dialogue with landowners to support delivery, support dialogue with potential delivery partners, site specific design briefs, local design codes, supplementary planning documents, engagement with potential funding sources and site promoters (e.g. GLA, SiteMatch)</u>	<u>All site Allocations.</u>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
2. <u>Growth / Opportunity Areas (as identified in local plan)</u>	<p>a. <u>Number of new homes built within Merton's Opportunity Area (OA) as set out in Chapter 1: Growth Strategy).</u></p> <p>b. <u>Amount of non-residential floor space built within the OA.</u></p>	<p><u>A(i) London Plan indicative target (up to 2041) to deliver 5,000 new homes and 6,000 jobs (indicative figure).</u></p> <p><u>A(ii) Cumulative housing completions since OA designation.</u></p> <p><u>B(i) Cumulative non-residential floorspace approvals and completions since OA designation.</u></p>	<p><u>A(i) Annual decrease in net new homes in identified Opportunity Area over a three-year rolling period following adoption of the Local Plan.</u></p> <p><u>B(ii) Annual decrease in non-residential floorspace delivered in the identified growth area over a three year rolling period following adoption of the Local Plan.</u></p>	<p>a) <u>Council to consider the reasons for reduced delivery of homes, and non-residential in the Growth / OA.</u></p> <p>b) <u>Council to consider whether the Local Plan's Growth Strategy needs to be reviewed and/or part review or full review of the Local Plan.</u></p> <p>c) <u>Potential actions include: working with the GLA on an Opportunity Area Planning Framework; preparing area-wide (or site-wide) design codes, masterplans or supplementary planning documents; engagement with landowners and potential delivery partners; engagement with organisations which could help unblock particular</u></p>	<p><u>Chapter 1B: Growth Strategy)</u></p> <p><u>Neighbourhood policies:</u> <u>Colliers Wood: Policy N3.1</u> <u>Morden: Policy N5.1</u> <u>South Wimbledon: Policy N7.1</u> <u>Wimbledon: Policy N9.1</u></p> <p><u>Site allocations within the OA.</u></p> <p><u>Strategic policy EC13.1 Promoting economic growth and successful high streets</u></p> <p><u>Policy EC13.2 Business locations in Merton</u></p> <p><u>Policy TC 13.5</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
				<u>delivery constraints (e.g. Transport for London, utilities)</u>	<u>Merton's town centres and neighbourhood parades</u> <u>Strategic policy IN 14.1 Infrastructure</u>
<p>3. <u>Air quality</u></p> <p><u>To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</u></p>	<p>a. <u>Appeals allowed, where the council refused planning permission for development that would have an unacceptable impact on air quality.</u></p>	<p>i. <u>Zero appeal decisions allowed.</u></p>	<p>1) <u>Annual increase of allowed appeals over a three year rolling period following adoption of the Local Plan.</u></p>	<p>a) <u>The council to consider the relevant details of the planning applications and their consideration in the appeal decision notices.</u></p> <p>b) <u>Actions could include: reviewing Merton's Air Quality SPD 2020; Consider whether the policy requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p>	<p><u>Policy P15.10 Improving Air Quality and Minimising Pollution</u></p> <p><u>Policy CC2.2 Minimising Greenhouse Gas Emissions</u></p> <p><u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation</u></p> <p><u>Policy T16.3 Managing the</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
					<u>transport impacts of development.</u>
<p>4. <u>Biodiversity</u></p> <p><u>To protect and enhance Merton's biodiversity and Sites of Recognised Nature Conservation Interest</u></p> <p><u>(Statutory Biodiversity Net Gain will be monitored and reported in accordance with Section 103 of The Environment Act 2021)</u></p>	<p>a. <u>Change in extent of area identified as Sites of Recognised Nature Conservation Interest.</u></p> <p>b. <u>Appeal decisions allowed, where the council refused planning permission for development that would have an adverse impact on Sites of Recognised Nature Conservation Interest and did not adequately apply avoidance, mitigation and/or compensation measures.</u></p> <p>c. <u>Appeal decisions allowed, where the council refused planning permission for development that results in unacceptable harm or loss of a tree/trees and there is no reprovision and/or</u></p>	<p><u>A(i) No net loss of Sites of Recognised Nature Conservation Interest.</u></p> <p><u>B(i) Zero appeal decisions allowed.</u></p>	<p><u>A(i) Annual net decrease in extent of area over a three year rolling period following adoption of the Local Plan.</u></p> <p><u>B(i) Annual increase in relevant appeal decisions allowed over a three year rolling period following adoption of the Local Plan.</u></p>	<p>a) <u>The council to consider the relevant details of the planning applications and their consideration in the appeal decision notices.</u></p> <p>b) <u>The council to consider actions including: producing supplementary planning documents, whether the policy requirements need to be reviewed as part of a partial or full review of the Local Plan.</u></p>	<p><u>Policy O15.3 Biodiversity and Access to Nature</u></p> <p><u>Policy O15.4 Protection of Trees</u></p> <p><u>Policy O15.5 Urban Greening</u></p> <p><u>Policy O15.6 Wandle Valley Regional Park</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
	<u>compensation measures.</u>				
<p>5. <u>Land and soil conditions, pollutants and water quality</u></p> <p><u>To retain or improve land stability.</u></p> <p><u>To ensure new development does not harm water quality</u></p>	<p>a. <u>Appeal decisions allowed, where the council refused planning permission for development that results in an unacceptable impact on land contamination and/or stability.</u></p> <p>b. <u>Planning permissions granted contrary to Environment Agency advice on pollution or water quality grounds.</u></p>	<p><u>A(i) Zero appeal decisions allowed.</u></p> <p><u>B(i) No approvals by the council.</u></p>	<p><u>A(i) Annual increase in relevant allowed appeal decisions over a three year rolling period following adoption of the Local Plan.</u></p> <p><u>B(i) Any council approval contrary to the monitoring indicator</u></p>	<p>a) <u>The council to consider the relevant details of the planning applications and their consideration in the appeal decision notices.</u></p> <p>b) <u>The council to consider actions including: producing supplementary planning documents, working with partners such as the Environment Agency on additional training and guidance; , whether the policy requirements need to be reviewed as part of</u></p>	<p><u>Policy P15.10 Improving Air Quality and Minimising Pollution</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
				<u>a partial or full review of the Local Plan.</u>	
<p>6. <u>Sustainable land use and tall buildings</u></p> <p><u>To make the best and most efficient use of land to support sustainable patterns and forms of development, including tall buildings where appropriate..</u></p>	<p>a. <u>Major planning permissions granted and completed.</u></p> <p><u>(b) Appeal decisions allowed, where the council refused planning permission for development that is contrary to the council's policies on tall buildings</u></p>	<p><u>A(i) 95% of major planning permissions started within a 3 year period from the date planning permission granted.</u></p> <p><u>B(ii) Zero appeal decisions allowed relating specifically to policies on tall buildings.</u></p>	<p>1) <u>Annual increase in allowed appeal decisions where the council refused a planning permission for tall buildings that does not meet the borough's tall building policy (D12.6) over a three year rolling target from adoption of plan.</u></p>	<p>a) <u>Council to consider the circumstance of the decisions that have led to the trigger and consider whether the policy requirements need to be reviewed as part of a partial or full Local Plan review. Actions could also include additional design codes or guides (which would include community engagement), supplementary planning documents, engagement with landowners.</u></p>	<p><u>Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods.</u></p> <p><u>Policy D12.2 Urban design</u></p> <p><u>Policy T16.5 Supporting transport infrastructure</u></p> <p><u>Policy D12.6 Tall buildings</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p>7. <u>Heritage (including landscape, architectural and archaeological heritage)</u></p> <p><u>To conserve and enhance the existing historic environment including heritage assets.</u></p>	<p>a. <u>Appeal decisions allowed, where the council refused planning permission for development that is contrary to the council's policies on the historic environment including heritage assets.</u></p> <p>b. <u>Number of heritage assets on Historic England's Heritage at Risk Register (not including tombstones).</u></p> <p>c. <u>Number of statutory Listed Buildings demolished as a result of development</u></p>	<p>i. <u>Zero appeal decisions allowed relating specifically to historic environment policies.</u></p> <p>ii. <u>No increase from 2022 baseline (heritage at risk)</u></p> <p>iii. <u>No statutory Listed Buildings demolished as a result of development</u></p>	<p>(i) <u>Annual increase in relevant allowed appeal decisions over a three-year rolling period following adoption of the Local Plan.</u></p> <p>ii. <u>No increase from 2022 baseline (heritage at risk) over a rolling three-year period</u></p> <p>iii. <u>increase in statutory listed buildings demolished as a result of development over a rolling three-year period</u></p>	<p>a) <u>Council to consider the circumstance of the decision that have led to the trigger and consider whether the policy requirements need to be reviewed as part of a partial or full Local Plan review. Actions could also include engagement with statutory consultees (e.g. Historic England, Gardens Trust) and local historic groups; additional conservation area or associated guides and management plans (which include community engagement), supplementary planning documents, engagement with landowners and potential funders</u></p>	<p><u>Policy D12.3 Ensuring high quality design for all developments</u></p> <p><u>Policy D12.5 Managing heritage assets</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p>8. <u>Flood risk management</u></p> <p><u>To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</u></p>	<p>a. <u>Number of planning permissions granted (either by the council or on appeal) contrary to Environment Agency advice on flood protection and water quality.</u></p> <p>b. <u>Number of completed SUDS incorporated in major development proposals.</u></p> <p>c. <u>Appeal decisions contrary to officers' advice on flooding relating specifically to managing flood risk for basement and subterranean developments</u></p>	<p>i. <u>No planning permissions granted or appeals allowed contrary to Environment Agency advice.</u></p> <p>ii. <u>All completed major developments incorporating SuDS in accordance with policy</u></p> <p>iii. <u>Zero appeal decisions allowed relating specifically to flood risk management for basement and subterranean developments.</u></p>	<p>1) <u>Annual increase in planning permissions granted or allowed appeal decisions where the council refused a planning permission contrary to Environment Agency advice over a three-year rolling target from adoption of plan.</u></p> <p>2) <u>Reduction in SUDS installed in new major developments in accordance with policy year on year over a three-year rolling period from adoption of plan.</u></p> <p>1) <u>Increase in appeal decisions allowed year on year over a rolling three-year period where the council refused planning for</u></p>	<p>a) <u>Council to consider the circumstance of the decisions that have led to the trigger and consider whether the policy requirements need to be reviewed as part of a partial or full Local Plan review. Actions could also include revisions to Merton's Sustainable Design Guide SPD 2020; revisions to Merton's basements and subterranean development SPD; additional engagement with utilities and the Environment Agency; submitting funding bids for greater support to address flooding from all sources; revisions to Merton's Strategic Flood Risk Assessment and local flood risk management plans</u></p>	<p><u>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage</u></p> <p><u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u></p> <p><u>D12.1 Basements and subterranean design</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
			<u>development basement and subterranean proposals that result in unacceptable flood risk</u>		
<p>9. <u>Climate change</u></p> <p><u>To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon Merton by 2050.</u></p>	<p>(a) <u>Appeal decisions allowed, where the council refused planning permission for development that is contrary to the council's policies on climate change.</u></p> <p>(b) <u>Average percentage improvement in operational carbon emissions against Part L of the Building Regulations.</u></p> <p>(c) <u>Number of applications achieving 100% improvement against Part L of Building Regulations on site.</u></p>	<p><u>A(i) Zero appeal decisions allowed relating specifically to climate change policies.</u></p> <p><u>B(ii) Achieving the carbon reduction targets set out in policy CC2.2.</u></p>	<p><u>Annual increase in allowed appeal decisions where the council refused planning permission in accordance with the relevant policies over a three-year rolling target from adoption of plan.</u></p>	<p>a) <u>The council to consider the circumstances of the decisions that have led to the trigger.</u></p> <p>a) <u>The council to consider whether Policy CC2.1 CC2.6 requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p> <p>b) <u>The council to consider whether the cost of carbon needs to be reviewed.</u></p> <p>a) <u>Other contingencies include: producing supplementary planning documents to advise on specific issues, to work with other boroughs and the</u></p>	<p><u>Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change</u></p> <p><u>Policy CC2.2 Minimising Greenhouse Gas Emissions</u></p> <p><u>Policy CC2.3 Minimising Energy Use</u></p> <p><u>Policy CC2.4 Low Carbon Energy</u></p> <p><u>Policy CC2.5 Minimising Waste and Promoting a</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
				<u>GLA on updating the London Plan 2021 Energy Assessment Guidance, preparing design guides for specific topics</u>	<u>Circular Economy</u> <u>Policy CC2.6 Sustainable Design Standards.</u>
<p>10. <u>Noise and vibration</u></p> <p><u>To minimise noise, vibration levels and disruption to people and communities.</u></p>	<p>a. <u>Appeal decisions allowed where the council refused planning permission for development that is contrary to the council’s policies on noise and vibration.</u></p>	<p>i. <u>Zero appeal decisions allowed relating specifically to noise pollution policies.</u></p>	<p>1) <u>Annual increase in appeal decisions allowed where the council refused planning permission on the ground that development would have an adverse impact or does not full mitigate or reduce noise impact over a three year rolling period from adoption of plan.</u></p>	<p>a) <u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p> <p>b) <u>Other contingencies include creating a supplementary planning document for noise, updating supplementary planning document for basement and subterranean development.</u></p>	<p><u>Policy P15.10 Improving Air Quality and Minimising Pollution and Land stability.</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p>11. <u>Water consumption</u></p> <p><u>Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</u></p>	<p>a. <u>Appeal decisions allowed, where the council refused planning permission for development that is contrary to the council's policies on water consumption.</u></p>	<p>i. <u>Zero appeal decisions allowed relating specifically to water consumption</u></p>	<p>1) <u>Annual increase in appeal decisions allowed where the council refused planning permission on the ground that development would have an adverse impact on sustainable water supply, drainage and sewerage system over a three year rolling period from adoption of plan.</u></p>	<p>a) <u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan. Other contingencies include working with utilities (e.g Thames Water) to improve guidance to developers such as via supplementary planning documents or design guides</u></p>	<p><u>Policy CC2.6 Sustainable Design Standards</u></p>
<p>12. <u>Open space</u></p> <p><u>To protect and enhance Merton's open spaces and natural environment.</u></p>	<p>a. <u>Appeal decisions allowed, where the council refused planning permission for development that is contrary to the council's policies on open space.</u></p> <p>b. <u>Extent of the areas of deficiency in access to nature and public Open Space.</u></p>	<p>i. <u>Zero appeal decisions allowed relating specifically to green infrastructure, open space and nature conservation policies.</u></p> <p>ii. <u>No increase in the extent of the areas of deficiency in access to nature and public Open</u></p>	<p>1) <u>Increase in appeal decisions allowed where the council refused planning permission that would result in net loss of open space and nature conservation areas over a three-year rolling period from adoption of plan.</u></p> <p>2) <u>Increase in extent of areas of deficiency in access to nature</u></p>	<p>a) <u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p> <p>b) <u>Other contingencies could include:</u></p> <p>- <u>reviewing the councils Open Space Strategy to consider reasons for deficiency in access to open space and nature conservation (e.g.,</u></p>	<p><u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation</u></p> <p><u>Policy O15.2 Open Space and Green Infrastructure</u></p> <p><u>Policy O15.3 Biodiversity and Access to Nature</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
	c. <u>Appeal decisions allowed, where the council refused planning permission relating specifically the Urban Greening Factor policy (this includes green walls and green roofs).</u>	<p><u>Space.</u></p> <p>iii. <u>Zero appeal decisions allowed relating specifically to failure to meet the relevant Urban Greening Factor targets.</u></p>	<p><u>and public Open as a result of planning approvals</u></p> <p>3) <u>Increase in appeal decisions allowed where the council refused planning permission for not providing any Urban Greening within major developments over a three-year rolling target from adoption of plan.</u></p>	<p><u>creating new access points to parks or improving access to existing biodiversity areas);</u></p> <p>- <u>Improving guidance on urban greening factors either via SPDs or design guides and codes</u></p>	<u>Policy O15.5 Urban Greening</u>
<p>13. <u>Sustainable transport</u></p> <p><u>To enhance connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</u></p>	<p>a. <u>Percentage of journeys by walking, cycling and public transport.</u></p> <p>b. <u>Number of registered electric vehicles (EV) in Merton annually.</u></p> <p>c. <u>Appeal decisions allowed, where the council refused planning permission relating specifically to the failure to provide adequate EV charging</u></p>	<p>i. <u>Increase in overall sustainable mode share based on a rolling three-year average - 73% by 2041.</u></p> <p>ii. <u>Increase in EV vehicles registered annually towards 100%.</u></p> <p>iii. <u>Zero appeal decisions allowed</u></p>	<p>1) <u>Reporting identifies under performance on trajectory to meet target for overall sustainable travel mode.</u></p> <p>2) <u>Increase in appeal decisions allowed relating specifically relating to the failure to provide EV charging points on site or failure to meet cycle parking standards over a</u></p>	<p>a) <u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p> <p>b) <u>Contingencies include providing design guidance on the installation of EV parking and cycle parking standards (including with the GLA and other London boroughs)</u></p>	<p><u>Strategic Policy T16.1 Sustainable Travel</u></p> <p><u>Policy T16.2 Prioritising active travel choices</u></p> <p><u>Policy T16.4 Parking and Low Emissions Vehicles.</u></p> <p><u>Policy T16.5 Supporting</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
	<p><u>points and infrastructure or failure to meet cycle parking standards or failure to provide secure, covered cycle parking and facilities in accordance with the London Plan minimum standards and chapter 8 of the London Cycle Design Standard.</u></p>	<p><u>relating specifically to failure to meet adequate EV charge points or cycle parking standards</u></p>	<p><u>three-year rolling period from adoption of the plan.</u></p> <p>3) <u>Increase in appeal decisions allowed that do not provide secure cycling electric chargers and secure parking facilities including non-standard cycling provision over a three-year rolling period from adoption of the plan.</u></p>		<p><u>transport infrastructure</u></p> <p><u>Policy D12.2 Urban design</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p>14. <u>Health and wellbeing</u></p> <p><u>To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</u></p>	<p>a. <u>Delivery of healthcare facilities identified in Merton's Local Plan and Infrastructure Delivery Plan.</u></p> <p>b. <u>Developments completed resulting in a loss or gain of sports and recreation facilities.</u></p> <p>c. <u>Number of Health Impact Assessments (HIA) submitted in accordance with policy HW10.2: Delivering healthy places.</u></p> <p>d. <u>Number of new hot food takeaways granted planning permission found within proposals within 400 metres of the boundaries of a primary or secondary school</u></p>	<p>i. <u>(Monitoring will be reported in the Health and Wellbeing Strategy annual update known as the Merton Story and added to the AMR).</u></p> <p>ii. <u>100% of relevant developments required to submit a HIA in accordance with policy HW10.2.</u></p> <p>iii. <u>No planning permission granted for a new hot food take away within the 400 metres of a school.</u></p>	<p><u>A(i) monitoring according to timescales required by the NHS deliver their service plans.</u> <u>B(i) 100% of HIAs submitted within a three- year period in accordance with policy HW10.2.</u> <u>C(i) Yearly increase in new hot food take aways within 400 metres of a primary and secondary school permitted over a three-year rolling period from adoption of plan.</u></p>	<p>a) <u>The council to consider the circumstances surrounding under-delivery and whether the policy requirements need to be review as part of a partial or full review of the Plan.</u></p> <p>b) <u>Other contingencies include working with the NHS in providing services, considering support for health and wellbeing services (e.g., via Community Infrastructure Levy; providing design codes and guides or supplementary planning documents to support healthy places, improving access to the Healthy Catering Commitment</u></p>	<p><u>Strategic policy HW10.1 Health (including mental health) and Wellbeing.</u></p> <p><u>Policy HW10.2: Delivering healthy places.</u></p> <p><u>Policy TC13.8 Food and drink / leisure and entertainment</u></p> <p><u>Policy IN14.3 Sport and Recreation</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p>15. <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>a. <u>Appeal decisions allowed where the council refused planning permission for development that is contrary to the council's housing policies.</u></p> <p>b. <u>Number of net additional homes granted planning permission.</u></p> <p>c. <u>Number of net additional homes completed.</u></p> <p>d. <u>Progress against borough wide affordable housing targets.</u></p> <p>e. <u>Number of Gypsy and Traveller pitches permitted</u></p> <p>f. <u>Updated needs assessment for Gypsies and Travellers</u></p>	<p>i. <u>Zero appeal decisions allowed relating specifically to housing policies.</u></p> <p>ii. <u>12,376 homes for the Plan period 2021/22 - 2036/37.</u></p> <p>iii. <u>50% of new homes borough-wide to be affordable across the plan period.</u></p> <p>iv. <u>Of affordable homes, 70% to be low-cost rent and 30% to be intermediate tenure</u></p> <p>v. <u>No net loss of pitches</u></p> <p>vi. <u>Up-to-date assessment of Gypsy and Traveller needs to be completed in 2025.</u></p>	<p>1) <u>Increase in appeal decisions allowed where the council refused planning permission – over a three-year rolling period from adoption of plan.</u></p> <p>2) <u>Housing completions fall more than 20% below the Local plan target in any rolling 3-year period.</u></p> <p>3) <u>Meeting the targets in the Housing Delivery Test.</u></p> <p>4) <u>Affordable housing completions do not reach the statutory targets over a rolling 5-year period.</u></p> <p>5) <u>The council to consider the impact on the Local Plan of the Mayor of London's Gypsies and Travellers Accommodation Assessment Study</u></p>	<p>a) <u>The council will explore the circumstances behind under-delivery, the barriers and constraints to housing delivery and consider how these can be resolved.</u></p> <p>b) <u>The council to consider whether the policy requirements need to be reviewed as part of a partial or full review of the Plan.</u></p> <p>c) <u>The council to review whether Traveller accommodation assessments find that needs have significantly changed, which would trigger a partial update of the Plan.</u></p> <p>d) <u>Other contingencies include undertaking the actions set out in housing delivery test action plans, such as encouraging</u></p>	<p><u>Strategic Policy No. H11.1 Housing choice</u></p> <p><u>Strategic policy No. H11.2 Housing Provision</u></p> <p><u>Policy No. H11.3 Housing mix</u></p> <p><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></p> <p><u>Policy No. H11.5 Student Housing, other housing with shared facilities and bedsits</u></p> <p><u>H11.6 Accommodation</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan and policy</u>
			<p><u>a) The council will explore the circumstances behind under-delivery, the barriers and constraints to housing delivery and consider how these can be resolved. b) The council to consider whether the policy requirements need to be reviewed as part of a partial or full review of the Plan. c) The Council to review whether Traveller accommodation assessments find that needs have significantly changed, which would trigger a partial update of the Plan. d) Other contingencies include undertaking the actions set out in housing delivery test action plans, such as encouraging</u></p>	<p><u>development to optimise site density and where appropriate prepare site development briefs design guides etc building on Merton's Small Sites Toolkit and Borough Character Study; Investigate the barriers and constraints to housing delivery by engaging with developers/ agents of sites where it appears that construction activity has not started or stalled; engage with Housing Associations, funders (e.g. GLA) and developers to optimise affordable housing delivery, work with Clarion on pitch delivery and maintenance for travellers</u></p>	<p><u>for Gypsies and Travellers</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
			<p><u>Strategic Policy No. H11.1 Housing choice Strategic policy No. H11.2 Housing Provision Policy No. H11.3 Housing mix Policy No. H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system. Policy No. H11.5 Student Housing, other housing with shared facilities and bedsits H11.6 Accommodation</u></p> <p><u>which is scheduled for publication in 2024 and any further locally specific assessment that may be required as a result of Policy H11.6.</u></p>		

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p>16. <u>Safe environments</u></p> <p><u>To contribute to safe and secure environments for all people including people with Protected Characteristics.</u></p>	<p>a. <u>Appeal decisions allowed where the council refused planning permission for development that is contrary to the council's policies on safe environments.</u></p>	<p>i. <u>Zero appeals allowed contrary to the advice of the Metropolitan Police Designing Out Crime Officer.</u></p>	<p>1) <u>Increase in appeal decisions allowed over a three year period from adoption of the plan where the council refused planning permission for major developments that do not adequately meet design and place shaping principles.</u></p>	<p>a) <u>The council to consider the circumstances behind under-delivery.</u></p> <p>b) <u>Contingencies include whether the policy requirements need to be review as part of a partial or full review of the Plan; producing design guides or codes to support developers in enhancing the safety of existing environments</u></p>	<p><u>Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods.</u></p> <p><u>Policy D12.2 Urban design</u></p> <p><u>Policy D12.3 Ensuring high quality design for all developments</u></p> <p><u>Policy HW10.2: Delivering healthy places.</u></p> <p><u>Strategic Policy T16.1 Sustainable Travel.</u></p>
<p>17. <u>Infrastructure</u></p> <p><u>To ensure that environmental, social and physical infrastructure is managed and delivered to support</u></p>	<p>a. <u>Delivery of infrastructure projects identified in the Infrastructure Delivery Plan (short, medium and long term as identified in the IDP).</u></p>	<p>i. <u>Number of infrastructure projects delivered in each rolling five years of the plan period to meet need</u></p>	<p>1) <u>Phasing of key infrastructure not being delivered in accordance with need</u></p>	<p>a) <u>Council to consider whether there are any obstacles to the delivery of infrastructure in the first 5 years and later years of the Plan, through annual reviews.</u></p>	<p><u>Policy IN14.2 Social and community infrastructure</u></p> <p><u>Policy IN14.2 Social and community infrastructure</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<u>demographic change</u>				b) <u>Contingencies include supporting the delivery of necessary infrastructure via Community Infrastructure Levy, considering co-location of public sector services if that helps viability (e.g. support by One Public Estate</u>	
18. <u>Design</u> <u>To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness.</u>	b. <u>Appeal decisions allowed where the council refused planning permission for development that is contrary to the council's urban design policies.</u>	i. <u>Zero appeal decisions allowed relating specifically to design policies.</u>	2) <u>Increase in appeal decisions allowed where the council refused planning permission that was contrary to the council's urban design policies over a three-year rolling period from adoption of plan.</u>	c) <u>The council to consider the circumstances of the decision that have led to the trigger for action.</u> d) <u>Contingency measures include:</u> - <u>Creating local design guides and codes (including to address specific trigger issues) taking account of the National Model Design Code and Guides</u> - <u>Creating new site-specific planning briefs or</u>	<u>Strategic Policy D12.1 Delivering well designed and resilient neighbourhood</u> <u>Policy D12.2 Urban design</u> <u>Policy D12.3 Ensuring high quality design for all developments</u> <u>Policy D12.4 Alterations and extensions to existing buildings</u>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
				<p><u>supplementary planning documents</u></p> <ul style="list-style-type: none"> - <u>Revising existing SPDs such as Merton’s Borough Character Study, Merton’s Small Sites SPD, Merton’s Shopfront guide, Merton’s sustainable drainage SPD</u> - <u>(all of the above incorporate community engagement)</u> 	<p><u>Policy D12.5 Managing heritage assets</u></p> <p><u>Policy D12.6 Tall buildings</u></p> <p><u>Policy D12.7 Advertisements</u></p> <p><u>Policy D12.8 Digital infrastructure</u></p> <p><u>Policy D12.9 Shop front design and signage</u></p> <p><u>Policy D12.10 Dwelling Conversions</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p>19. <u>Education and skills and local employment</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.</u></p>	<p>a. <u>Number of school places meets pupil needs.</u></p> <p>b. <u>Number of Employment and Training Strategies offering local employment and apprenticeships as part of developments of over 150 homes / 10,000 sqm non-residential floorspace.</u></p>	<p>i. <u>Delivery of necessary school places to meet needs.</u></p> <p>ii. <u>All developments of over 150 homes / 10,000sqm non-residential floorspace to provide Employment Strategies including employment and/or training opportunities for local people.</u></p>	<p>1) <u>Failure to provide new school places to meet identified pupil place needs over a three-year rolling period from adoption of plan.</u></p> <p>2) <u>Failure of developments of over 150 homes / 10,000sqm non-residential floorspace to provide employment strategies.</u></p>	<p>a) <u>Council to consider the circumstances of the decision that have led to a trigger.</u></p> <p>b) <u>Contingencies include working with Dept for Education on creating and supporting appropriate school places to meet needs, supporting the creation of school places and facilities with Community Infrastructure Levy; Council to consider whether a review of the policy requirements need to be reviewed as part of a partial or full review of the Plan.</u></p>	<p><u>Policy IN14.2 Social and community infrastructure</u></p> <p><u>Policy TC13.9 Culture, arts and tourism development</u></p> <p><u>Policy EC13.3 Protection of scattered employment sites</u></p>
<p>20. <u>Economic growth and town centres</u></p> <p><u>To increase the vitality and viability of existing town centres, local</u></p>	<p>a) <u>Appeal decisions allowed, where the council refused planning permission for development that is contrary to the council's policies on town centres and</u></p>	<p>i. <u>Zero appeal decisions allowed relating specifically to town centre and economic development policies.</u></p>	<p>i. <u>Increase in appeal decisions allowed where the council refused planning permission that was contrary to</u></p>	<p>a) <u>Council to consider the circumstances of the decision that have led to a trigger.</u></p> <p>b) <u>Contingencies include consider the results of the annual review of shopfront vacancy in</u></p>	<p><u>Strategic policy EC13.1 Promoting economic growth and successful high streets</u></p> <p><u>Policy EC13.2 Business</u></p>

<u>Topic</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency for each topic area.</u>	<u>Local Plan policy</u>
<p><u>centres and parades.</u></p> <p><u>To ensure a sufficient supply of premise to meet demand for industry, logistics and services.</u></p>	<p><u>economic development.</u></p> <p>b) <u>Extent of Strategic Industrial Locations</u></p> <p>a. <u>Annual review of shopfront vacancy rate in Merton's town centres.</u></p>	<p>ii. <u>No net loss of Strategic Industrial Locations.</u></p>	<p><u>the council's town centre and economic development policies over a three-year rolling period from adoption of plan.</u></p> <p>ii. <u>Net loss of Strategic Industrial Locations over a three-year rolling period from adoption of the plan</u></p>	<p><u>Merton's town centres and designated parades, support increased footfall and economic activity in town centres through supporting and hosting events, managing markets and liaising with businesses, work with partners such as Merton Chamber of Commerce, Business Improvement Districts and South London Partnership on programmes to promote businesses and jobs</u></p> <p>c) <u>Council to consider whether a review of the policy requirements need to be reviewed as part of a partial or full review of the Plan.</u></p>	<p><u>locations in Merton</u></p> <p><u>Policy EC13.3 Protection of scattered employment sites</u></p> <p><u>Policy TC 13.5 Merton's town centres and neighbourhood parades</u></p> <p><u>Policy TC 13.6 Development of town centre type uses outside town centres</u></p> <p><u>Policy TC13.7 Protecting corner / local shops</u></p> <p><u>TC13.9 Culture, arts and tourism development</u></p>

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 (Delivery of the Spatial Strategy and Core Policies).</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>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</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, Hedges and Other Landscape Features</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>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</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>

MM Appendix 4 – after page 602 (MM353)

Metropolitan Open Land (MOL) – boundary amendments and exceptional circumstances

The following pages set out details of all the boundary amendments to Metropolitan Open Land (MOL), in accordance with national policy (NPPF 2021 para 140) and London Plan 2021 (Policy G3). Relevant policies for MOL are set out in Chapter 15 (Strategic Policy O15.1 and Policy O15.2). The new boundaries of all MOL sites are illustrated on the Policies Map.

MOL-01 – Cannon Hill

Site Description (including relevant physical boundary features):

Cannon Hill MOL is located on the border of the Morden and Raynes Park Neighbourhoods. It includes Cannon Hill Common, Joseph Hood Recreation Ground, Martin Way Allotments and a number of sport and recreation facilities.

The physical boundaries include:

- North – Bushey Road,
- East – The David Lloyd building footprint, fencing and rear of residential properties surrounding Martin Way Allotments and Joseph Hood Recreation Ground.
- South – Cannon Hill Lane, Parkway and the fenced rear boundaries of residential properties.
- West – Fenced rear boundaries of residential properties facing Grand Drive to the west.

Description of MOL boundary change (including any exceptional circumstances):

To realign the MOL boundary with the current building line, which has changed through approved planning applications since the 2014 Sites and Policies Map was adopted. This boundary amendment is made to accurately reflect what is built on site, namely the outline of the David Lloyd building along with associated entrances and exits to the outdoor sporting features, fencing to the north and landscaping to the east.

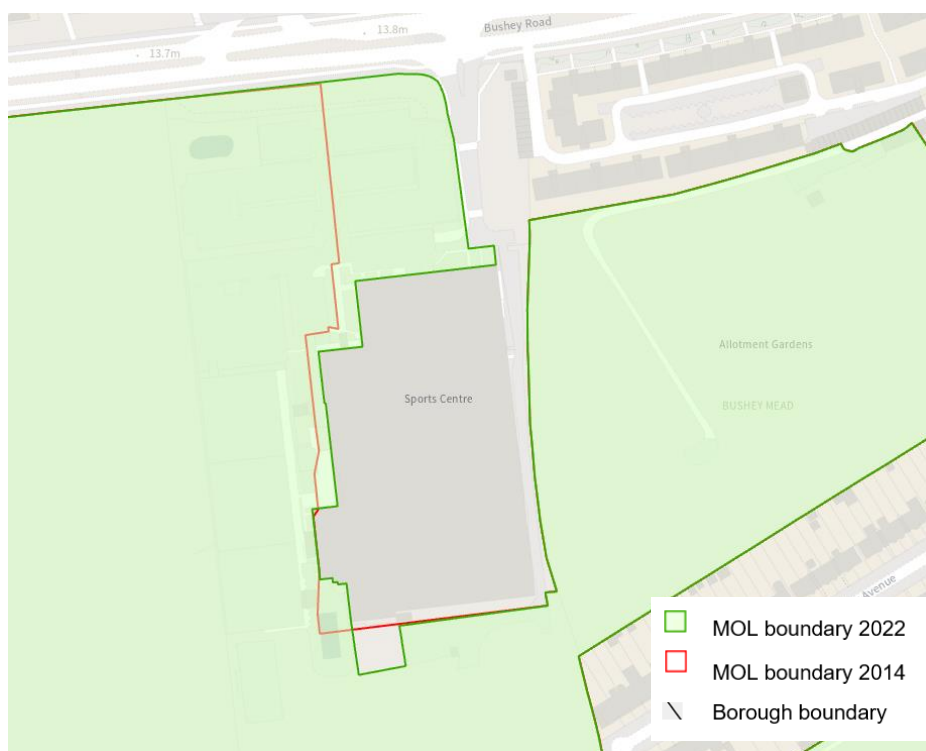
The remainder of the site continues to meet the MOL criteria 1, 2 and 3 from the London Plan and maintains openness as detailed in the NPPF.

There would be no harm to the wider MOL function through the removal of this building. In fact, the building itself is deemed to harm the openness of wider the Cannon Hill MOL.

Relevant Planning Application: [19/P3979](#).

This boundary change results in an addition of 0.54ha MOL (from 55.25ha to 55.79ha), which is a 0.98% change.

Map illustrating boundary change:



MOL-03 – Lower Morden

Site Description (including relevant physical boundary features):

The Lower Morden MOL is located within the Morden Neighbourhood.

The physical boundaries include:

- North – fenced residential properties on both sides of Arthur Road, along Marina Avenue, Tennyson Avenue, Westway and Meadowsweet Close.
- East – Grand Drive, fenced residential properties off St Catherine’s Close, Derwent Road, Coniston Close and Buttermere Close, Eveline Day Nursery, St John Fisher Primary School and Lower Morden Lane.
- South – Garth Road, landscaped edge of Morden and Sutton Joint Cemetery abutting built form of adjoining industrial area.
- West – the western boundary primarily follows the pedestrian walkways which provide a link from Trafalgar Avenue, along the rear of the industrial area, cemetery and equestrian centre, up and around Sir Joseph Hood Memorial Playing Fields, along the Beverley Brook. It should be noted that this also forms the borough boundary with LB Sutton.

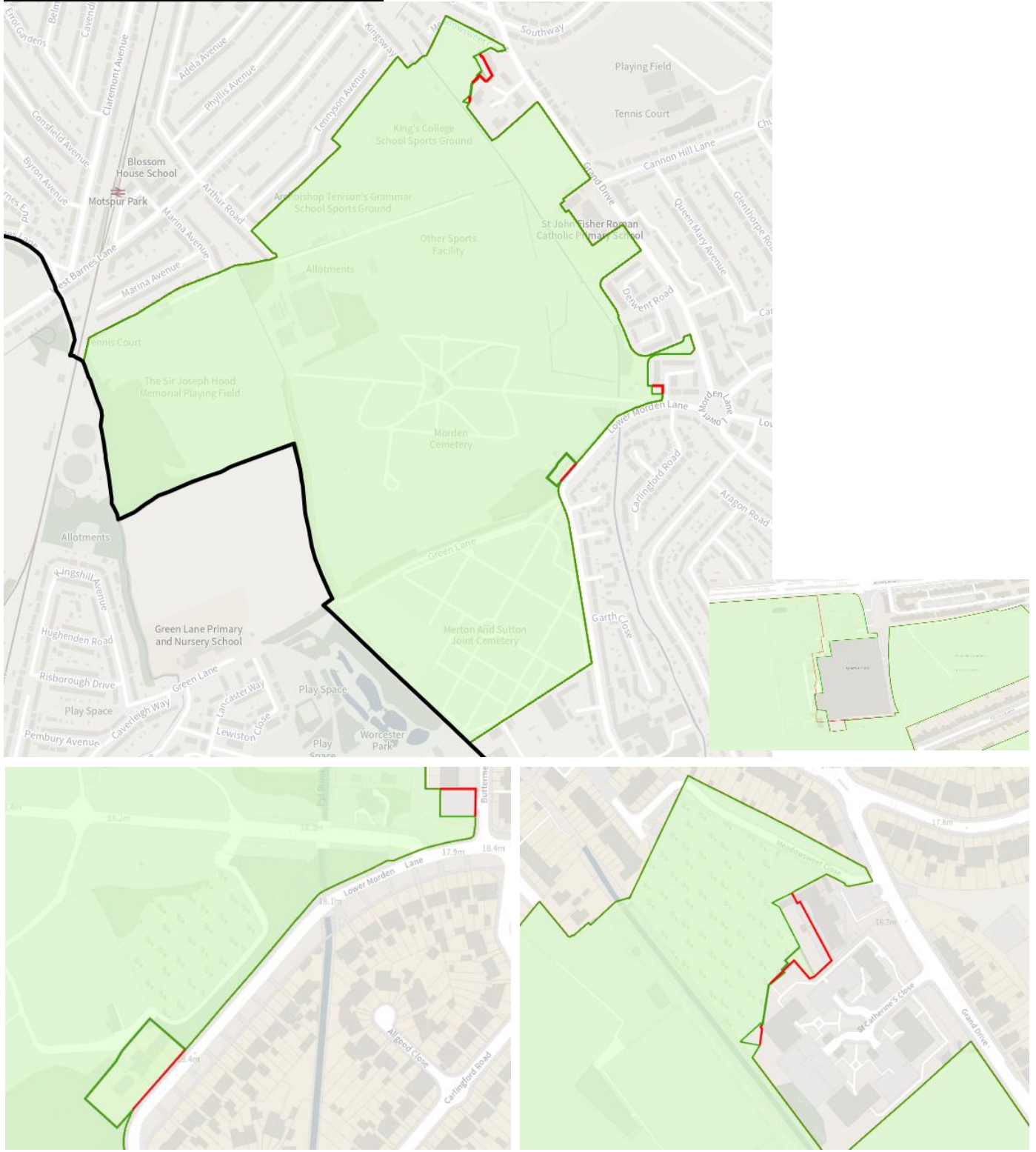
Description of MOL boundary changes (including any exceptional circumstances):

There are four separate boundary changes:

1. Land off Meadowsweet Close. A minor amendment is proposed to realign the MOL boundary with the current building line which has changed since the 2014 Policies Map was adopted. The site is physically and visually separated, with a nursery building, outdoor play area and site boundary fence offering no connections to the MOL.
2. Correction to cartographic boundary error near Eveline Day Nursery & St Catherine’s Close.
3. Land off Buttermere Close. A minor boundary amendment is proposed to realign the MOL boundary and remove a residential carpark. The carpark is ancillary to the adjoining residential units and is not linked to the cemetery. It does not contribute to the openness of the Lower Morden MOL. This appears to be an error in the 2014 Policies Map.
4. Proposed boundary amendments to remove four houses next to the cemetery from Lower Morden MOL. This is an error from the 2014 Policies Map. While the houses are directly adjacent to the cemetery, they are freehold properties separately owned and are not related to the cemetery. They do not contribute to the openness of the MOL.

These boundary changes represent a reduction of 0.2ha (from 81ha to 80.8ha), which is a 0.25% change.

Maps illustrating boundary changes:



MOL-04 – Beverley Brook / A3

Site Description (including relevant physical boundary features):

The Beverley Brook/A3 MOL is located within the Raynes Park Neighbourhood. It includes several sports & recreation grounds and part of the Malden Golf Course.

The physical boundaries include:

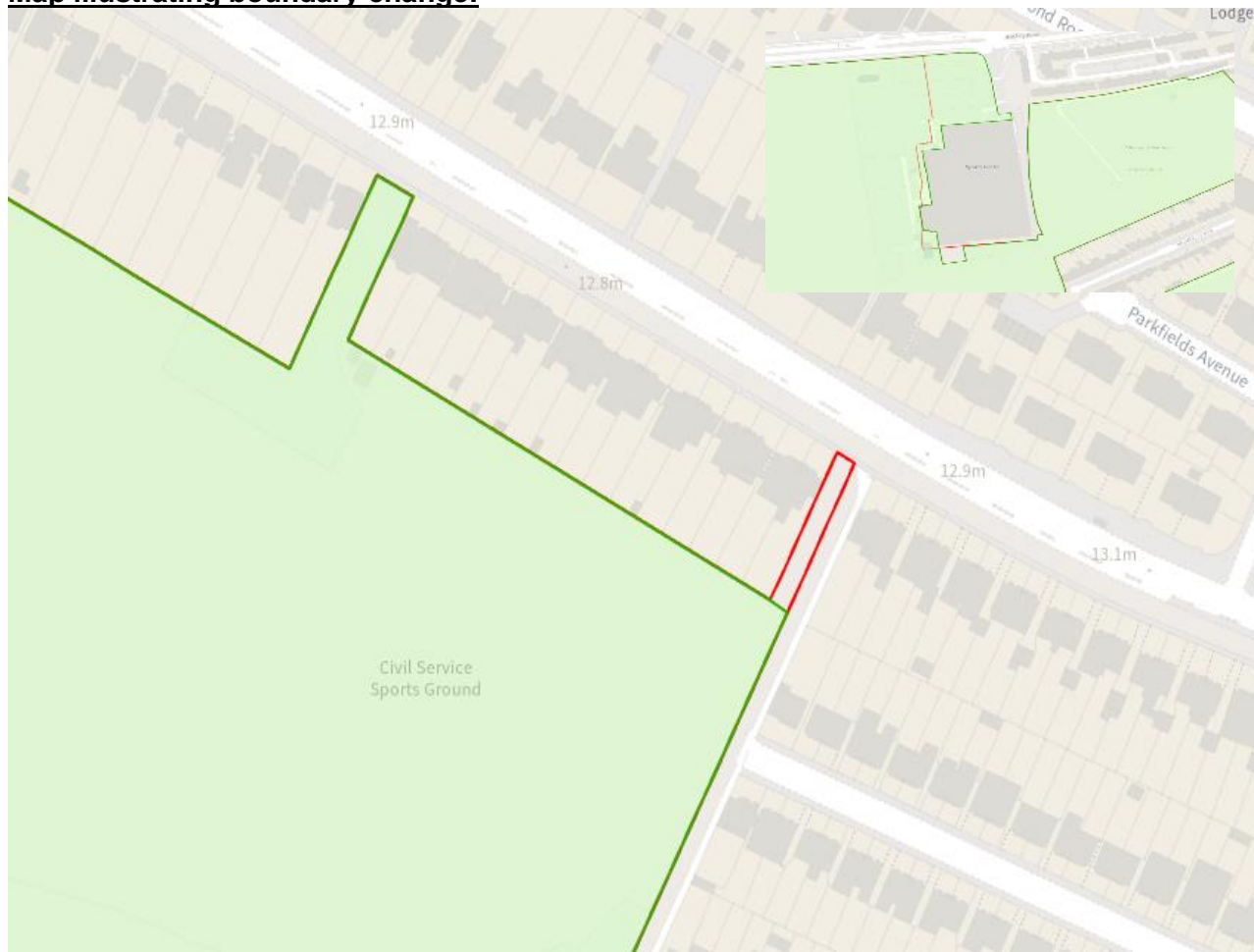
- North – Fenced residential properties off Somerset Avenue, Camberley Avenue, Coombe Lane, Coombe Gardens and Beverley Way.
- East – The A3, fenced residential properties off Aboyne Drive and Taunton Avenue.
- South – The built form of the adjoining industrial area and the landscaped edge of the overground railway line.
- West – The A3 and the Beverley Brook, which also forms the borough boundary with LB Kingston.

Description of MOL boundary change (including any exceptional circumstances):

This part of the site appears to have been included as MOL in error in the 2014 Sites and Policies Plan. It does not meet the MOL criteria set out in the London Plan and is therefore recommended to be removed. The site is privately owned, is physically separated from the adjoining MOL, does not offer sports, leisure, recreation, art or cultural activities and does not contain features or landscapes of a national or metropolitan value.

These boundary changes represent a reduction of 0.02ha (from 28.96ha to 28.94ha), which is a 0.07% change.

Map illustrating boundary change:



MOL-05 – Copse Hill

Site Description (including relevant physical boundary features):

The Copse Hill MOL is located within the Wimbledon Neighbourhood. It includes Morley Park and other green spaces around the Atkinson Morley and former Wilson Hospital residential developments.

The physical boundaries include:

- **North – Built form at Atkinson Morley and the former Wilson Hospital.**
- **East – Fenced residential properties off Heights Close, Cottenham Place and Prospect Place.**
- **South – Cottenham Park Road.**
- **West – Primary School and fenced residential properties off Melville Avenue and Burdett Avenue.**

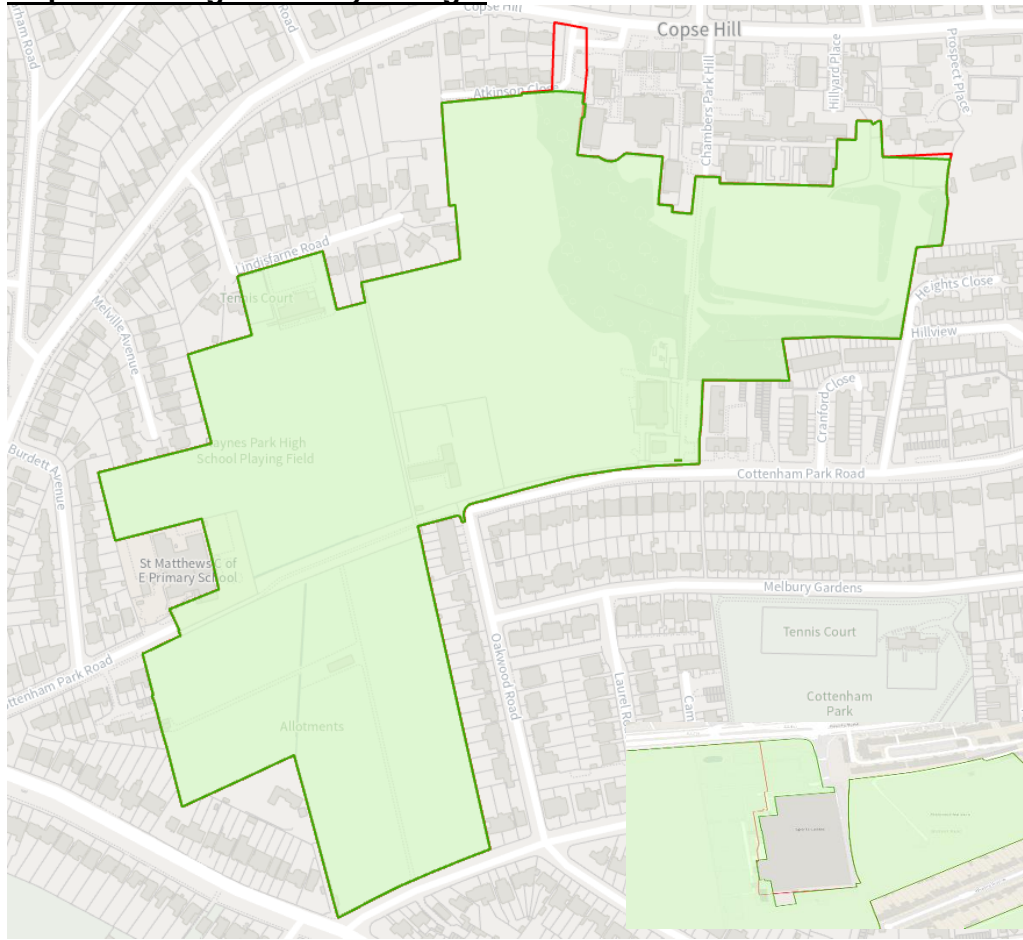
Description of MOL boundary change (including any exceptional circumstances):

Boundary changes are proposed to reflect the approved planning applications and new built form for this site. The built form of the new developments at Atkinson Morley and the former Wilson Hospital sites set the physical boundaries of the northern edge of this MOL.

Relevant planning applications: [13/P2722](#) and [16/P4853](#).

These boundary changes represent a reduction of 0.1ha (from 16.1ha to 16ha), which is a 0.62% change.

Map illustrating boundary change:



MOL-12 – Wimbledon Common

Site Description (including relevant physical boundary features):

The Wimbledon Common MOL is located within the Wimbledon Neighbourhood. It includes the Royal Wimbledon Golf Club, Wimbledon Common, and various sports, leisure and recreation facilities.

The physical boundaries include:

- **North – Borough boundary with LB Wandsworth.**
- **East – The A219.**
- **South – Southside Common and fenced residential properties.**
- **West – The A3.**

Description of MOL boundary change (including any exceptional circumstances):

No boundary changes.

Map illustrating boundary change:

N/A

MOL-14 – Mitcham Common

Site Description (including relevant physical boundary features):

The Mitcham Common MOL is located in the Mitcham Neighbourhood. It includes Mitcham Golf Club, Mitcham Common, Cranmer Nature Reserve, and various sports, leisure and recreation facilities.

The physical boundaries include:

- **North – Commonside East.**
- **East – Borough boundary with LB Croydon.**
- **South – Borough boundary with LB Sutton.**
- **West – Railway and Tram lines, A239.**

Description of MOL boundary change (including any exceptional circumstances):

No boundary changes

Map illustrating boundary change:

N/A

MOL-16 – Morden Park

Site Description (including relevant physical boundary features):

The Morden Park MOL is located within the Morden Neighbourhood. It includes Morden Cricket Club, Morden Park and other recreation and leisure facilities.

The physical boundaries include:

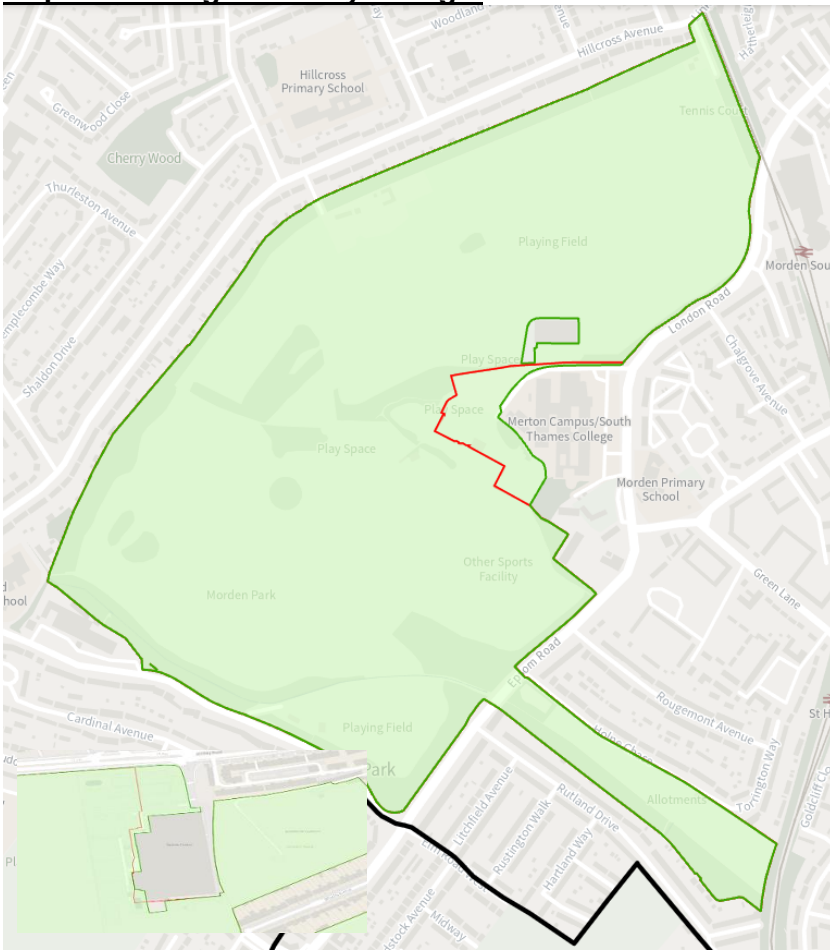
- **North – Railway line and rear fenced residential properties off Hillcross Avenue.**
- **East – A24.**
- **South – Lower Morden Lane.**
- **West – Residential properties off Hillcross Avenue, Lower Morden Garden Centre.**

Description of MOL boundary change (including any exceptional circumstances):

Boundary amendment to the former and new Morden Leisure Centre site and minor extension to the MOL boundary to include the adjoining carpark, play area and other ancillary features to the park. This proposed amendment is to reflect the location of the new Morden Leisure Centre, approved with a MOL land swap through a planning application and ensure all areas of Morden Park that meet the MOL criteria are included for protection. The former leisure centre building has been demolished and this area has now been restored for nature conservation purposes. Relevant planning application: [16/P0882](#)

These boundary changes represent an addition of 1.56ha MOL (from 73.24ha to 74.8ha), which is a 2.13% change.

Map illustrating boundary change:



MOL-18 – Wandle Valley

Site Description (including relevant physical boundary features):

The Wandle Valley MOL stretches across a large area of the borough, through the Mitcham, Morden, Colliers Wood and Wimbledon Neighbourhoods.

The physical boundaries include:

- North – Borough boundary with LB Wandsworth.
- South – Borough boundary with LB Sutton.
- East and West – The MOL follows the River Wandle and broadly encompasses the Wandle Valley Regional Park sites, which stretch across a thin corridor from north to south of the borough.

Description of MOL boundary change (including any exceptional circumstances):

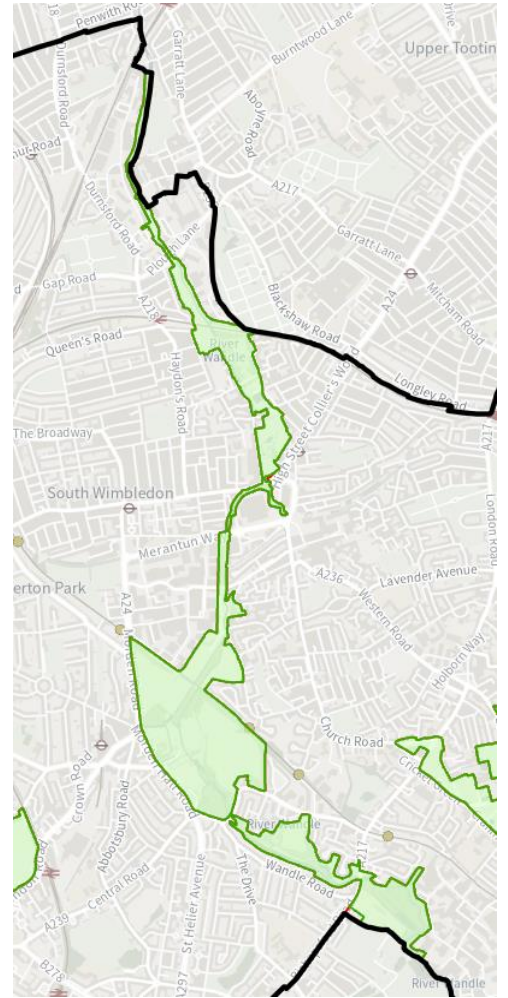
1. 222 High Street, Colliers Wood. The removal of this retail property and adjacent car park is proposed and necessary to correct an error in the 2014 MOL boundary. This site does not form part of the Wandle Valley MOL corridor and is an anomaly that needs to be corrected. The built form and ancillary carpark are clearly separated from the park and do not contribute to the openness of the MOL.

2. Tooting and Mitcham Hub. As demonstrated through the approved planning application, this site meets very special circumstances and MOL is to be removed as per the granted permission and S106 agreement. The approved residential development will not contribute to the openness of the MOL and will act as a physical barrier to the surrounding area.

Relevant planning application: [19/P4094](#)

These boundary changes represent a reduction of 0.3ha (from 103ha to 102.7ha), which is a 0.29% change.

Maps illustrating boundary change:

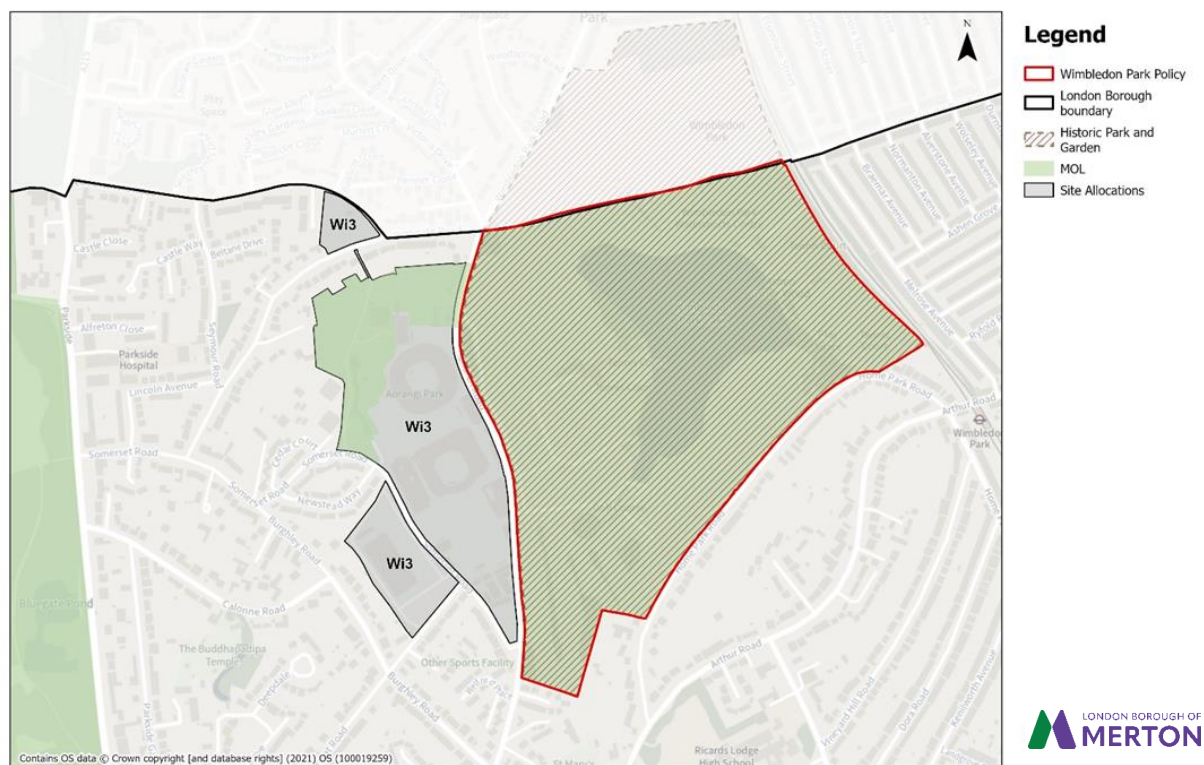


4 WIMBLEDON PARK – POLICY N8.1

To address the reasons why the Grade II* Wimbledon Park is on Historic England's Heritage at Risk Register and to recognise and support its sporting, recreation, ecological and amenity functions.

We will do this by:

- a. Supporting, the park's sport, recreation, play and amenity uses and enhancing access to them, ensuring their successful integration with historic and biodiversity designations.
- b. Preparing a landscape management plan to help all landowners co-ordinate the long-term management and maintenance of Wimbledon Park.
- c. Securing investment in the former golf course to conserve and enhance the historic landscape, biodiversity, sport and recreation and secure public access.
- d. Improving public access around the whole lake, alongside biodiversity, sporting, public safety, flood risk, while ensuring compliance for reservoir safety.
- e. Addressing the lake's poor condition and seeking restoration of its historic shape and form.
- f. Ensuring the lake continues to operate safely and in line with the national requirements for a large raised Reservoir, while managing flood risk.
- g. Identifying and protecting historic trees and other trees of significant amenity value and considering a programme for their renewal.
- h. Considering the removal of insensitive tree and other non-native planting, particularly on the former golf course and around the athletics track.
- i. Protecting and enhancing biodiversity, increasing the ecological interest of the park and its waterbodies.
- j. Respecting the site's historic setting, enhancing historic and new views to and across the lake, and to St Mary's Church, and supporting greater public access to these views.



SUPPORTING TEXT

- 8.1.1. Wimbledon Park is a Grade II* Historic Park and Garden, lying to the north of the borough and crossing the borough boundary between Merton and Wandsworth. The majority (c48ha) of the park lies within the London Borough of Merton; a smaller proportion(c12ha) lies within the London Borough of Wandsworth.**
- 8.1.2. Wimbledon Park is the remnants of a larger Lancelot “Capability” Brown landscape, designed in the late 1700ds originally for a nearby Manor House (since demolished). The Wimbledon Park Conservation Area Character Appraisal for Wimbledon Park contains details of the successive Manor Houses and the evolution of Wimbledon Park to what it is today.**
- 8.1.3. Wimbledon Park is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of Wimbledon Park, owned by Merton Council is currently publicly accessible. The All England Lawn Tennis Club’s main grounds lies to the west of Wimbledon Park across Church Road and the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park.**
- 8.1.4. The whole of Wimbledon Park is designated as Metropolitan Open Land, designated Open Space and Green Corridor. Wimbledon Park lies within Wimbledon North Conservation Area and a Tier 2 Archaeological Priority Area. Except for the public park, the site lies within a Site of Importance for Nature**

Conservation (SINC) Borough Grade 1. These designations are addressed by other policies in the Development Plan.

- 8.1.5. **Wimbledon Park lake is the clearest surviving feature of Capability Brown's original design. Other surviving landscape features over 200 years old include veteran trees and the presence of woodland at Horse Close and Ashen Grove. The lake is also a registered 'large raised' Reservoir under the Reservoir Act 1975, an active watersports destination and a Site of Importance for Nature Conservation, containing protected species and their habitats. The Lake connects via the Wimbledon Park Brook and surface water sewer network into the River Wandle downstream in Earlsfield.**
- 8.1.6. **In addition to the historic and natural environment designations, Wimbledon Park is an intensively used sporting venue across all three land ownerships, hosting watersports, tennis, beach volleyball, cricket, hockey and golf until 2023. The public part of the park is also important for recreation, play and amenity. Wimbledon Park meets multiple priorities for green and blue infrastructure and associated amenity, education, health and wellbeing benefits as set out in Merton's Green Infrastructure Study 2020.**
- Sports, recreation and play**
- 8.1.7. **NPPF 2023 paragraph 98 states "Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change." The London Plan supports retaining and enhancing formal and informal sporting and recreational facilities to encourage physical activity and deliver a range of social, health and wellbeing benefits. The London Plan also recognises that the co-location of sporting facilities can increase participation.**
- 8.1.8. **Wimbledon Park supports a wide range of sports and recreational uses including angling, watersports, athletics, bowls, hockey, cricket, mini-golf, tennis and beach volleyball. It also provides open space for informal sports and recreation, particularly on the Great Field in the public park, walking around the park and parts of the lakeshore, the recently deculverted brook and in the children's playgrounds and splash play. In line with policy IN14.3 we will safeguard existing sport and recreation facilities, encourage further opportunities for sport, recreation and play, encourage co-location of services and improve community access.**
- 8.1.9. **The public park is intensively used and this policy seeks to maintain this and improve public access to private land ownership where possible. This policy supports the provision of well-maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support access to and enjoyment of more of the park for people of all ages and abilities.**
- Enhancing biodiversity and access to nature**
- 8.1.10. **Wimbledon Park, including the lake, has multiple land use designations to support biodiversity and nature conservation. Protected species including**

different species of bat and birds, stag beetle, common frog and toad, European eel, veteran trees and other flora. There is also potential to improve biodiversity resilience by better habitat management, for example addressing the poor condition of the lake, removing recent planting located too close to veteran trees, replacing non-native with native species, and reducing pollutants in grassland management. In line with policy O15.3 biodiversity and access to nature we will protect and enhance biodiversity and improve accessibility to nature.

The historic environment

- 8.1.11. Paragraph 190 of the NPPF 2023 state “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation.
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
- 8.1.12. In 2016 the Wimbledon Park Registered Park and Garden was added to Historic England’s Heritage At Risk Register due to the following issues:
- Uncertainty around the future [of the entire historic landscape].
 - The impacts of divided ownership on landscape management.
 - Obscured views.
 - The deterioration of the Lake.
- Addressing the future of the historic landscape and landscape management
- 8.1.13. Wimbledon Park is currently owned by three freeholders. The 9 hectare lake and c18 hectares of Wimbledon Park is owned by Merton Council and used as a public park, including part that lies within the London Borough of Wandsworth.
- 8.1.14. The remainder is privately owned and is not publicly accessible. 29 hectares is the freehold of the All England Lawn Tennis Club. In 2016 when Wimbledon Park was added to Historic England’s “Heritage at Risk” register, Wimbledon Park Golf Club was the leaseholder of this land which was used as a golf course for many decades until January 2023. The remaining c4 hectares is owned by the Wimbledon Club.
- 8.1.15. Wimbledon North Conservation Area Character Appraisal 2006 (sub-area 2) describes the remnants of the Capability Brown landscape at Wimbledon Park, and positive and detrimental features. For many decades landscape management has been divided across four organisations (the council, the Wimbledon Club, AELTC and their leaseholder, the Wimbledon Park Golf Club). The sites were being managed intensively and largely independently in

accordance with their main purpose: either as a public park including sporting and recreational uses, a private sporting venue or a golf course.

8.1.16. Wimbledon north conservation area character appraisal 2006 identifies positive and negative landscape features within and just beyond Wimbledon Park. Addressing the negative features in Wimbledon Park's landscape, enhancing the positive features and, where possible, better co-ordinating landscape management across the whole site will help to address the reasons that Wimbledon Park is on the Heritage at Risk Register.

8.1.17. To this end we will secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward. This will provide a comprehensive plan for the conservation, enhancement and ongoing management of the entire registered park and garden that takes full account of the site's historic development and significance, acting as a common agreed baseline for all parties to work from.

Addressing obscured views

8.1.18. In the eighteenth century the original Capability Brown landscape was curated across a larger area in the "English Landscape" style, using the existing topography and man-made features including the creation of the lake with spurs to resemble river entrances, open parkland interspersed by carefully placed trees and woodland all giving rise to curated views, including of St Mary's Church spire. Veteran trees, particularly oak and some dating or pre-dating the 1800s, remain across the former golf course and within the council-owned public park. The woodland belts at Horse Close Wood and Ashen Grove were also part of the Brownian layout.

8.1.19. Younger, faster growing trees have been planted to create fairways as part of the former golf course operations; sometimes obscuring the views and parkland setting and sometimes in too close proximity to veteran trees. Faster growing conifers and polars planted to screen the athletics track also dominate the landscape negatively.

8.1.20. Due in part to the reservoir dam face, trees, and C20th buildings and structures built within the park, the parkland and lake are difficult to see from key publicly accessible points, including Home Park Road, the closest entrance to Wimbledon Park Station. The topography (rising at either end and including the lake's dam face) both helps and hinders views across the area. Buildings on or adjacent the lakeshore in the public park and the Wimbledon Club site obscure views across the lake.

8.1.21. The following measures should be considered for addressing obscured views, including those derived from Wimbledon North Conservation Area Character Appraisal 2006:

8.1.22. To improve the historic view lines across the lake:

- a) Removing insensitive tree planting, particularly around the athletics track and on the former golf course.

b) Improving the appearance of buildings or removing them and to co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people.

8.1.23. To improve views across the whole park and lake, improving historic views and creating new views:

a) Removing insensitive fairway tree and other planting on the former golf course and anywhere else it is found,

b) Improving public access to currently private land and particularly around the whole lake.

c) Ensuring that viewing points are accessible to people of all abilities by creating or maintaining paths, fences and planting so as not to create a barrier to access or views.

d) Ensuring that buildings or development are co-located wherever possible and designed to minimise their impact on the landscape.

Addressing the deterioration of the lake

8.1.24. Wimbledon Park lake is the largest and most visible remaining feature of Capability Brown's man-made landscape. The spurs that feed into the lake have been partially filled in, reducing the lakes size, form and shape. The Lake is fed by overland flow paths and the surface water sewer network, principally by two large surface water sewers and outfalls both of which are currently adopted by Thames Water. The total catchment area which feeds the lake is approximately 230ha of which 40ha is direct catchment and 190ha is indirect catchment from urbanised areas, including highway runoff.

8.1.25. It is a registered as a Grade A large raised reservoir, regulated under the Reservoir Act 1975. The reservoir is retained by an earthfill embankment, some 320m long. The height of the embankment varies from approximately 1m to a maximum of about 4m. The Lake flows into the River Wandle downstream in Earlfild via the Wimbledon Park Brook and the surface water sewer network.

8.1.26. The Lake is not used for drinking water supply purposes. The current poor quality of the Lake and its setting is one of the reasons that Wimbledon Park is on the "heritage at risk" register.

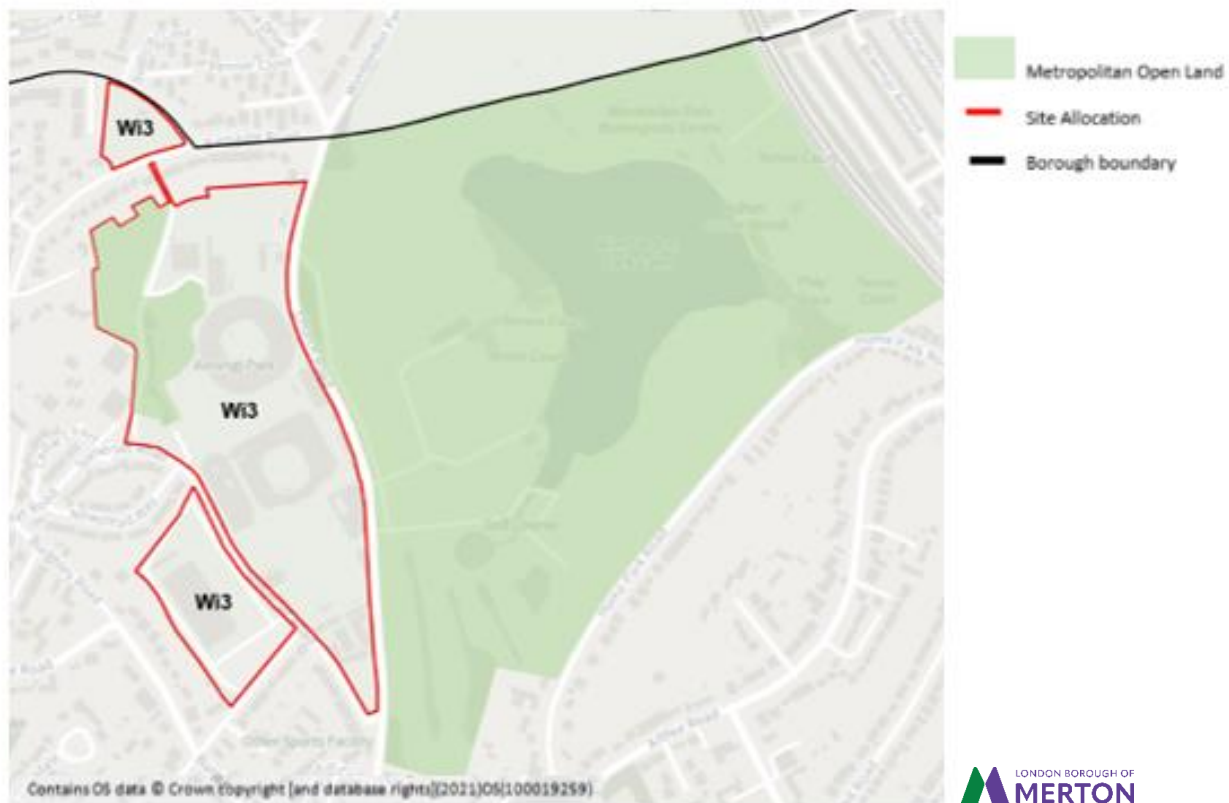
8.1.27. As well as being a large raised reservoir, the lake is intensively used for a variety of activities including angling, watersports and by wildfowl (including visitors feeding the birds) and has high localised amenity value. Over the years, the lake has suffered from pollution incidents, as a result of flytipping waste into drains or via drainage misconconnections from private properties which inadvertently connects household foul drains to the surface water sewer network which ultimately feeds into the lake. Several of these pollution incidents have resulted in fish kills, particularly in summer when oxygen levels in the lake are low and water depths are shallow.

8.1.28. The lake is generally shallow in depth, sited in an urban area and in terms of water quality it is nutrient rich. During summer, when the water heats up and oxygen levels are low and nutrient levels are high, the suffers from algal blooms, some of which can be hazardous to wildlife, pets and the public. Since its

formation, the Lake has over time silted up quite considerably. This siltation is in part due to detritus ingress through the outfalls into the Lake, vegetation (leaf fall) and wildfowl habitat, combined with a relatively stagnant water passage through the lake being artificially dammed over hundreds of years.

- 8.1.29. A Section 10 Reservoir Act inspection report was carried out in 2014 which included statutory requirements that needed to be actioned to ensure compliance with the Act for Reservoir Safety. The council carried out a bathymetric survey of the silt levels in 2015. The council completed the Wimbledon Park Lake Reservoir Safety scheme in 2022, which has addressed reservoir safety requirements and made some improvements to the landscape and lake edge. As part of the wider opportunities of this project, the Council were able to deculvert an open section of the Wimbledon Park Brook in the public park to help create additional flood storage and improve the landscape and biodiversity. However the lake needs de-silting to ensure its amenity and historic value, to ensure water quality is not compromised, as the climate changes and hotter summers become more frequent. De-silting will be likely to help to reduce the number and length of algal blooms, improve its ecological capacity, increase oxygenation and continue to use the Lake safely and fully for watersports, angling, heritage, biodiversity and amenity.
- 8.1.30. Given the size of this historic asset and its London location, the lake shoreline currently has very limited public access. We will work with all landowners to improve public access around the whole lake, taking into account biodiversity habitats, sporting, safety and reservoir management considerations.

Site Wi3: All England Lawn Tennis Club - Church Road, Wimbledon, SW19 5AE



Ward: Wimbledon Park

Site description:

1. The All England Lawn Tennis and Croquet Club site, and specifically the Wimbledon Championships has long been internationally recognised as the premier tennis tournament in the world on grass. This long-established competitive tennis venue is the reason that “Wimbledon” is an internationally recognised and valued brand.
2. The site is the All England Lawn Tennis Club (AELTC), an internationally recognised tennis venue with 18 outdoor and indoor tennis courts and supporting hospitality, offices, catering, press, players, security etc in a series of buildings and structures across the site.
3. The site is occupied all year around but is used intensively and in its entirety during the two weeks of the Wimbledon Championships when it employs more than 10,000 people on-site, is visited by more than 500,000 spectators and broadcast to more than a billion people in +200 countries. The combined annual economic activity associated with The Championships and the activities of the AELTC was estimated in 2015 to be £180m for London and £280m for the UK (based on figures provided by AELTC).
4. The main site is approximately 14 ha, with a smaller site of approximately 3ha across Somerset Road housing covered courts to the west and 22 grass courts in a site to the north; all of which are part of the AELTC site.
5. Wimbledon Park, including Wimbledon Park Lake, lies at the other side of Church Road to

the east of the site. The remaining surrounding area are made up of detached, semi-detached and terraced homes, many set in large plots in tree-lined streets.

6. AELTC now owns the former golf course in Wimbledon Park and proposes that this becomes part of the hosting estate for the Wimbledon Championships, enabling the entire site to support the qualifying rounds and the Championships themselves by 2030. **In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council.**

7. ~~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.~~

8. ~~The AELTC have commenced the preparation of an updated masterplan new masterplan to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course.~~

Site owner: All England Lawn Tennis and Croquet Club

Site area:-17.83 hectares

Existing uses:

1. Part of the AELTC estate used mainly between May to September and intensively during the two weeks of the internationally recognised Wimbledon Championships.
2. Outside The Championships period the site remains in use for member, club and charitable activities and includes the AELTC's Wimbledon Lawn Tennis Museum which attracts 100,000 visitors per year.
3. ~~Wimbledon Park Golf course is currently an 18-hole golf course with club house and maintenance facilities This use will cease from January 2022.~~

Site allocation: World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake.

Site deliverability: 5-10 years

Design and accessibility guidance:

1. Development of the site provide an opportunity to ~~master planning the golf course land to~~ create environmental, social and economic benefits to the wider area, to host more sporting activities, upgrade and improve AELTC's facilities to continue the prominence of The Championships ~~and the opportunity to host more of the pre-Championship activities within Merton.~~ Other opportunities benefits are:
 - a. Make the most of the substantial economic benefits (directly and indirectly) of the site for the borough and for London.
 - b. In combination with the AELTC Raynes Park site, to support the capacity of the Wimbledon Junior Tennis Initiative, in providing better facilities for the free tennis coaching programme for primary school aged children in Merton and Wandsworth schools.
 - c. ~~Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England's "heritage at risk" register by AELTC former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.~~

2. Development proposals 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, **from Bathgate Road conservation area and those views identified in the Wimbledon north conservation area appraisal.**
3. Development proposals will need to investigate the potential impact of the proposed development on archaeological heritage.

Infrastructure Requirements:

1. **The AELTC site is used in a highly intensive manner, usually for less than two months per year, and relatively little outside the tennis grass court season given its size, scale and bespoke use. Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of any unusual usage patterns prevalent at the time and predicted for its future use.**
2. Development proposals for this site must refer to the have regard to Merton's Infrastructure Delivery Plan **and ensure infrastructure requirements have been addressed by the proposal** and ~~Green Infrastructure Study 2020.~~
3. ~~Transport for London~~ are engaged in the master planning of the site and may have infrastructure requirements relating to the amended use of the former golf course site. A travel plan will also be required to incorporate all the AELTC's landholdings and the Championships, which should support how people access the site in a sustainable way.
4. The developer should contact Thames Water and SGN (~~Southern Gas Networks~~) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.
5. This site is in an area ~~identified as being deficient~~ **of deficiency** in access to nature. The Council will ~~require~~ **expect** proposals to ~~alleviate~~ **address** this deficiency in accordance with the Green Infrastructure policies.
6. ~~This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.~~
7. **To assess any potential environmental impacts to Wimbledon Common (Special Area of Conservation), any substantial development proposal must be supported by measures set out in planning policies for on-site and off-site environmental monitoring proportionate to the scale of development proposed. Such proposals will be required to submit a full Construction Logistics Plan - outlining all phases of construction' and proposals must support the installation of air quality monitoring devices along the A219 (Parkside) during the construction of the site.**

The site location

Impacts Listed Buildings or undesignated heritage assets.

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". Various listed buildings

	and structures <u>including Grade II* listed St Mary's Church and Wimbledon Park, a Grade II* listed Historic Park on the "heritage at risk register"</u> are also visible from the site.
Impacts a Conservation Area.	Yes. The north end of the site sits within Bathgate Road conservation area. The whole of the site is within an archaeological priority zone. Wimbledon <u>North</u> conservation area lies to the west <u>and the south</u> of the site
Impacts an Archaeological Priority Area.	Yes <u>No</u>
Impacts a Scheduled Ancient Monument.	No
In a Flood Zone.	No, however the AELTC owned land at the golf course borders Wimbledon Park Lake, a key part of the man-made historic landscape features which is also a Category A reservoir (regulated by the Environment Agency). Merton Council are undertaking improvements to Lake and the raised dam to ensure compliance with the Reservoirs Act.
Is in a Town Centre.	No
Is in an Opportunity Area.	No
Impacts a designated open space.	Yes, <u>part of the site to the north and north-west is designated as Metropolitan Open Land (MOL)</u> and designated open space.
Impacts ecology designations.	<u>No</u> Yes, the golf course and surrounding land and lake are designated as Sites of Importance for Nature Conservation and green corridors.
Public Transport Accessibility Level (PTAL).	PTAL 2 poor access to public transport

10 Appendix A1 – Schedule of Modifications to the Policies Map

- a. The page and paragraph numbers are those in the [Stage 3 pre-submission draft Local Plan consulted on 22 July to 6 September \(Ref. 0D1\)](#).
- b. The modifications are being proposed to:
- Improve clarity and consistency in the interests of clarity and
 - To ensure that the plan is sound, justified and effective
 - In the interests of clarity and to ensure consistent use of terminology.
 - To secure general conformity with the London Plan/NPPF and in the interests of effectiveness.

Figure A2: HRA screening of the Modifications to the Policies Map

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM-MOL Map-01a	Map	Policies Map – Metropolitan Open Land	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-3).</i>	This site contains 4 residential properties which do not form part of the adjoining cemetery and are physically separated. They do not meet any of the MOL criteria set out in the London Plan and officers consider that their inclusion in 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 Appendix 1 for details	No change to HRA findings. <i>No 'likely significant effects'</i>
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 Appendix 1 for details	No change to HRA findings. <i>No 'likely significant effects'</i>
MM- Open	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</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	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
Space Map-02			<i>Joint Cemetery Surrounds Open Space (M074).</i>	<p>out in the Merton Green Infrastructure Study 2020. Officers consider that their inclusion in the Open Space designation is an anomaly and they should be removed. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	No 'likely significant effects'
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> <p>Refer to map in Appendix 1 for details.</p>	No change to HRA findings. No 'likely significant effects'
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>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 1 for details.</p>	No change to HRA findings. No 'likely significant effects'
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>	<p>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'.</p> <p>Refer to map Appendix 1 for details.</p>	No change to HRA findings. No 'likely significant effects'
MM-SINC Map-05	Map	Policies Map – Sites of Importance for	<i>Wimbledon Park SINC (MeBI02) - An additional area of land needs to be included in this SINC as the land</i>	Reviewed following Stage 3 Local Plan response (D .Dawson) and confirmed by Martin Boyle (LBM Greenspaces team).	No change to HRA findings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
		Nature Conservation	<i>contains a number of veteran trees and other wildlife interest.</i>	<p>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.</p> <p>This change was identified through a Stage 3 Local Plan consultation response and has been confirmed with the Council's Ecologist. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	No 'likely significant effects'
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.</p> <p>The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	No change to HRA findings. No 'likely significant effects'
MM-SINC Map-06a	Map	Policies Map – Sites of Importance for Nature Conservation	<i>Morden Park SINC (MeBI11) - The SINC boundary needs to be amended to align with the details in the approved and implemented landscaping condition (9) of application 16/P0882.</i>	<p>To ensure the boundaries accurately align with approved and implemented landscaping details that include hardstanding for parking and access to an electrical substation, which are not be designated as being part of the SINC.</p> <p>The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	No change to HRA findings. No 'likely significant effects'
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</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</p>	No change to HRA findings. No 'likely significant effects'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<i>remove part of the Thames Water site at Byegrove Road, Colliers Wood.</i>	to date site photos were provided by Thames Water following the Stage 3 submission. The modifications ensure that the Local Plan is 'justified'. Refer to map Appendix 1 for details.	
MM-Green Corridor Map-07a	Map	Policies Map – Green Corridor	<i>Morden Park and Surrounds (GC10) - The Green Corridor boundary needs to be amended to align with the details in the approved and implemented landscaping condition (9) of application 16/P0882.</i>	To ensure the boundaries accurately align with approved and implemented landscaping details that include hardstanding for parking and access to an electrical substation, which are not designated as being part of the Green Corridor. The modifications ensure that the Local Plan is 'justified'. Refer to map Appendix 1 for details.	No change to HRA findings. No 'likely significant effects'
MM-APZs-Map-08	Map	Policies Map – Archaeological Priority Zones	<i>Removed the map showing Archaeological Priority Zones from the Policies Map.</i>	For accuracy and to ensure that the Local Plan is 'justified', this data has been removed because it has been superseded by Archaeological Priority Areas according to the latest information from Historic England.	No change to HRA findings. No 'likely significant effects'
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.	No change to HRA findings. No 'likely significant effects'
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"	No change to HRA findings. No 'likely significant effects'
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.	No change to HRA findings. No 'likely significant effects'

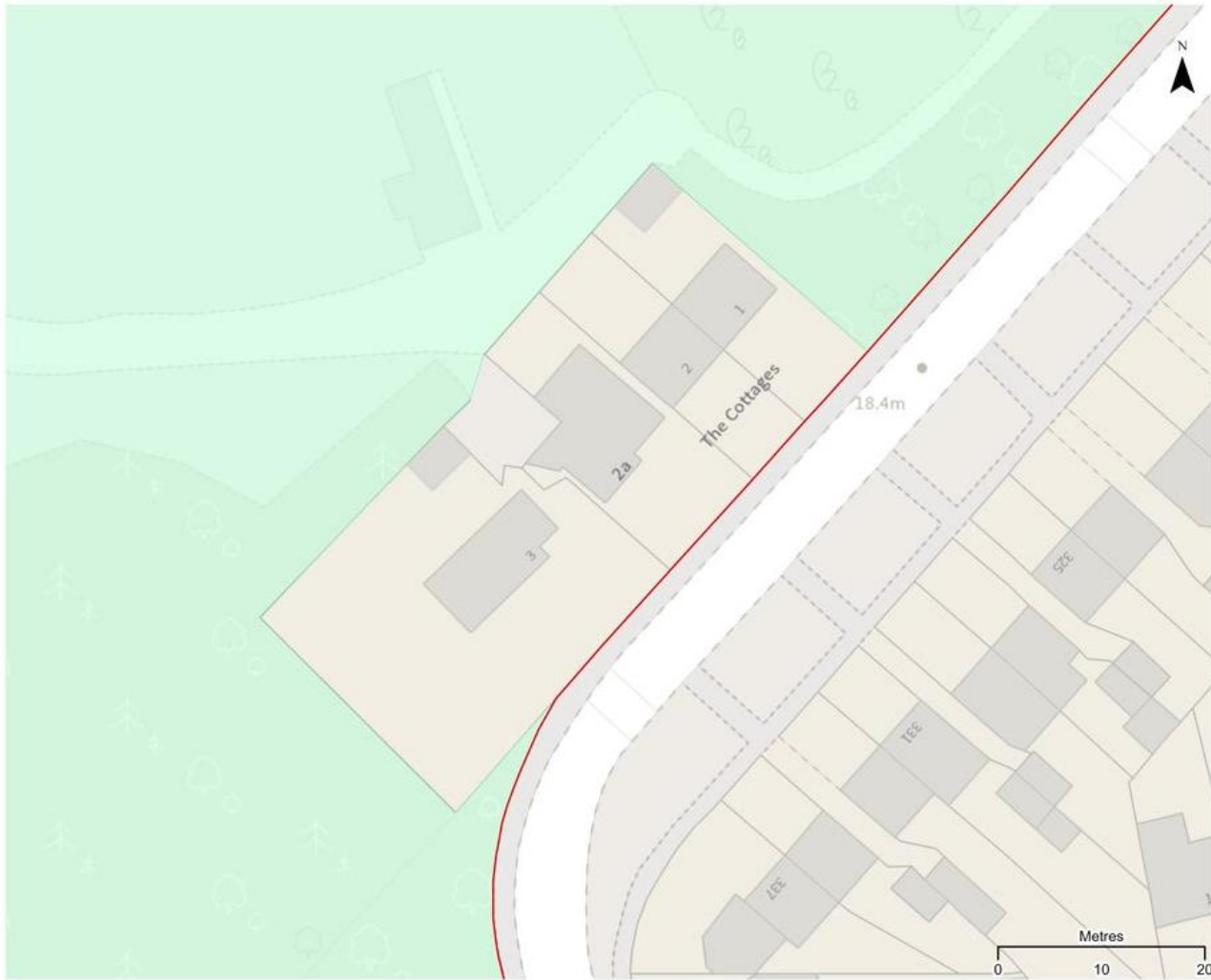
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
MM-Wandle Trail/ National Cycle Network Route 20 (NCN20) - Map-12	Map	Policies Map Wandle Trail/ National Cycle Network Route 20 (NCN20)	<i>New map to highlight the cycle routes that are part of the Wandle Trail</i>	For 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 from the Wandle Valley Forum. The name of the map has also been updated to improve clarity. Refer to map Appendix 1 for details.	No change to HRA findings. No <i>'likely significant effects'</i>
MM-Wandle Trail proposed "missing link" route-Map-13	Map	Policies Map New map Wandle Trail proposed "missing link" route -Map13	<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. The name of the map has also been updated to improve clarity. Refer to map Appendix 1 for details.	No change to HRA findings. No <i>'likely significant effects'</i>
MM-Neighbourhood Parade Map-14	Map	Policies Map – Neighbourhood Parade	<i>Neighbourhood Parade at 211-219 Manor Road - The Neighbourhood Parade boundary needs to be amended to correct a drafting error and display all the properties as listed in Table 13.5b 'Neighbourhood Parades in Merton', i.e. 211 Manor Road is to be shown to be within the Neighbourhood Parade.</i>	To improve accuracy, effectiveness, and ensure that the Local Plan is 'justified'. Refer to map Appendix 1 for details.	No change to HRA findings. No <i>'likely significant effects'</i>
MM-Neighbourhood Parade Map-15	Map	Policies Map – Neighbourhood Parade	<i>Neighbourhood Parade at 172b - 196–172B Streatham Road - The Neighbourhood Parade boundary needs to be amended to correct a drafting error and display all the</i>	To improve accuracy, effectiveness, and ensure that the Local Plan is 'justified'. Refer to map Appendix 1 for details.	No change to HRA findings. No <i>'likely significant effects'</i>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Implications for 2021 HRA findings
			<i>properties as listed in Table 13.5b 'Neighbourhood Parades in Merton', i.e. 196 Streatham Road is to be shown to be within the Neighbourhood Parade.</i>		
MM-Site Allocation Map-16	Map	Policies Map – Site Allocations	<i>Site Allocation Mo5 Morden Medical Centre – change the boundary line location at the southeastern corner of the site, to ensure that the whole of the eastern site boundary aligns with the parts of Morden Road that are designated as 'TfL Red Route'.</i>	To improve accuracy and effectiveness. Refer to map Appendix 1 for details.	No change to HRA findings. No ' <i>likely significant effects</i> '
MM-Site Allocation Map-17	Map	Policies Map – Site Allocations	<i>Site Allocation Wi3 All England Lawn Tennis Club –amend boundary to exclude any parts on Wimbledon Park and therefore only include the portions to the west of Church Road.</i>	To ensure the plan is effective and consistent with national policy.	No change to HRA findings. No ' <i>likely significant effects</i> '
MM – SAC – Map	Map	Policies Map – new map	<i>New map to show extent of Special Area of Conservation(SAC) on Wimbledon Common</i>	To improve clarity and ensure that the extent of the SAC, which is referred to in Policy O15.3, is shown on the Policies Map. Refer to map Appendix 1 for details.	

Appendix 1 – Mapping changes

MM-MOL-Map-01a

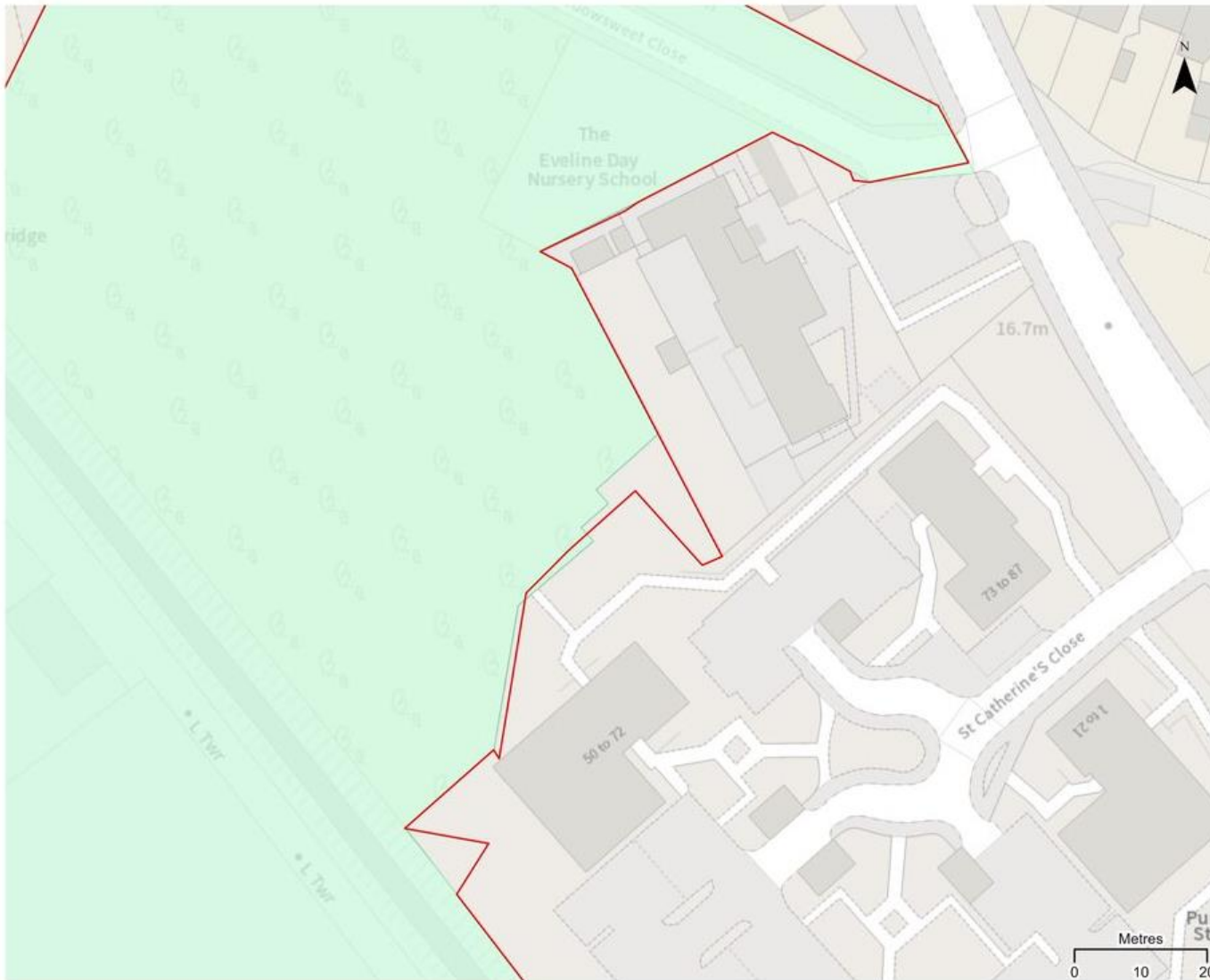
- MOL Stage 3
- MOL Submission



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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 Submission



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

-  Open Space Stage 3
-  Open Space Submission

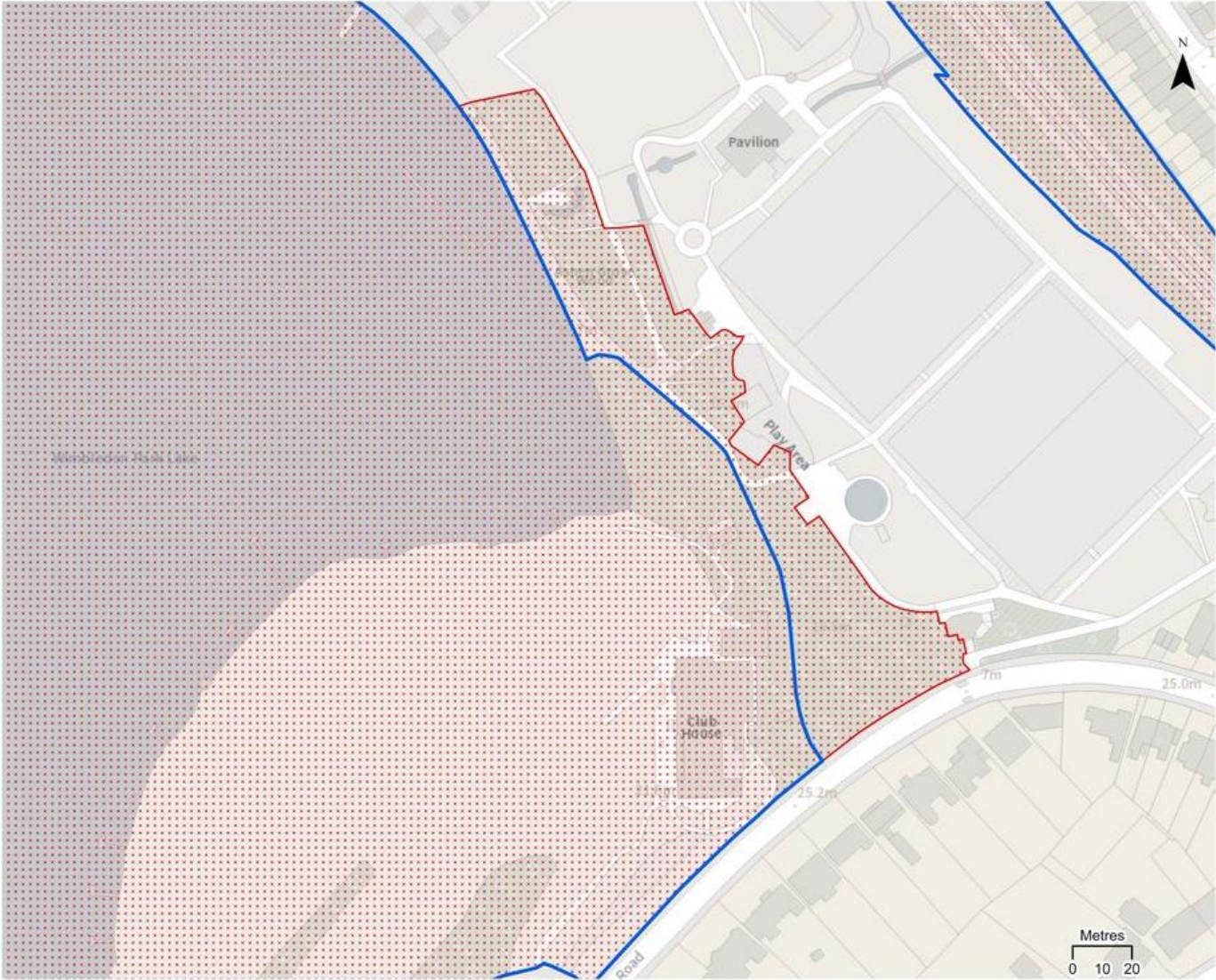


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MM-SINC-Map-05



- SINC's Stage 3
- SINC's Submission

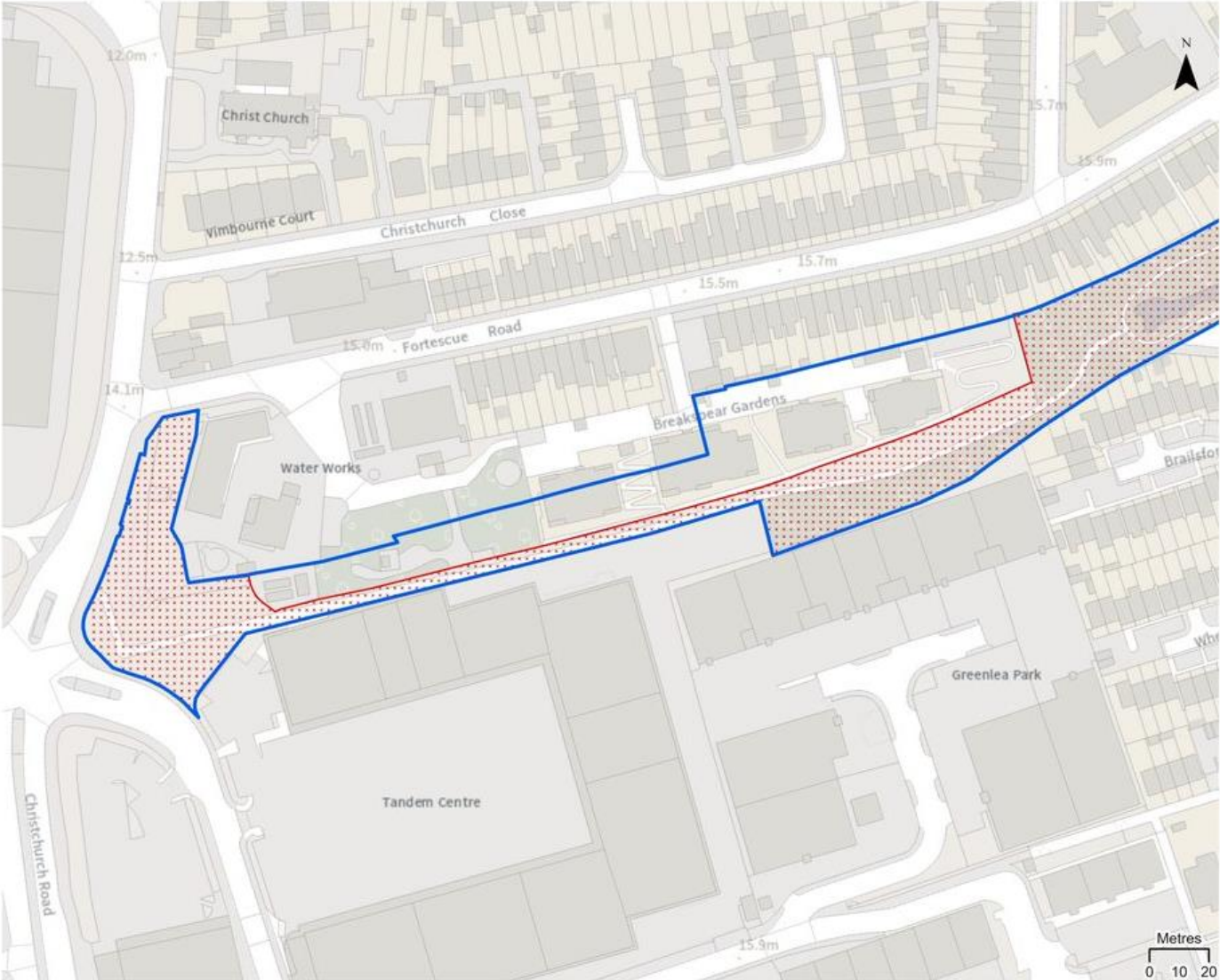


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MM-SINC-Map-06

-  SINC Stage 3
-  SINC Submission





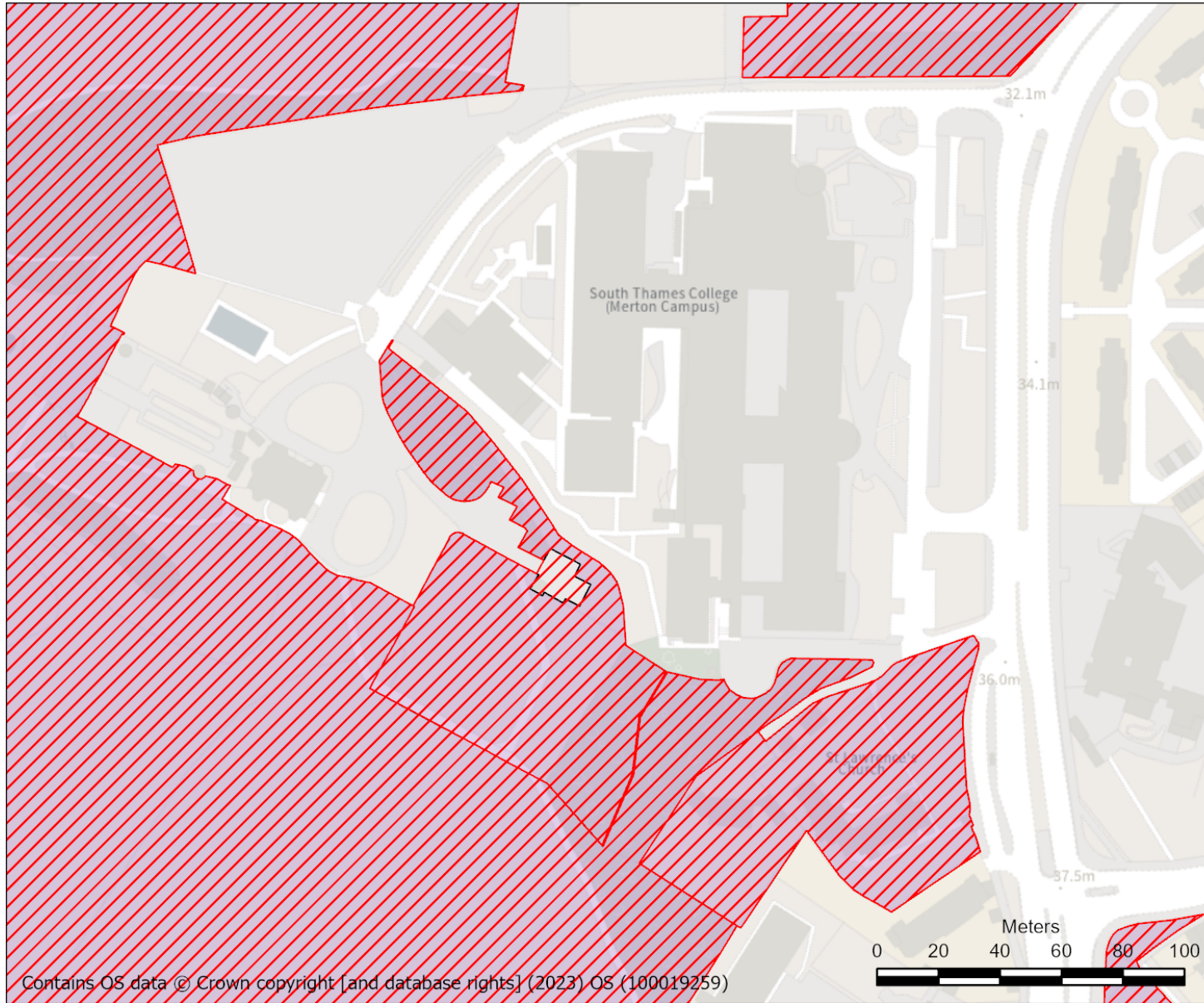
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MM-SINC Map-06a

Legend



- Sites of Importance for Nature Conservation (SINCs) (published July 2021)

- Sites of Importance for Nature Conservation (SINCs) modified July 2023




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MM-Green Corridor- Map-07



-  Green Corridors Submission
-  Green Corridors Stage 3

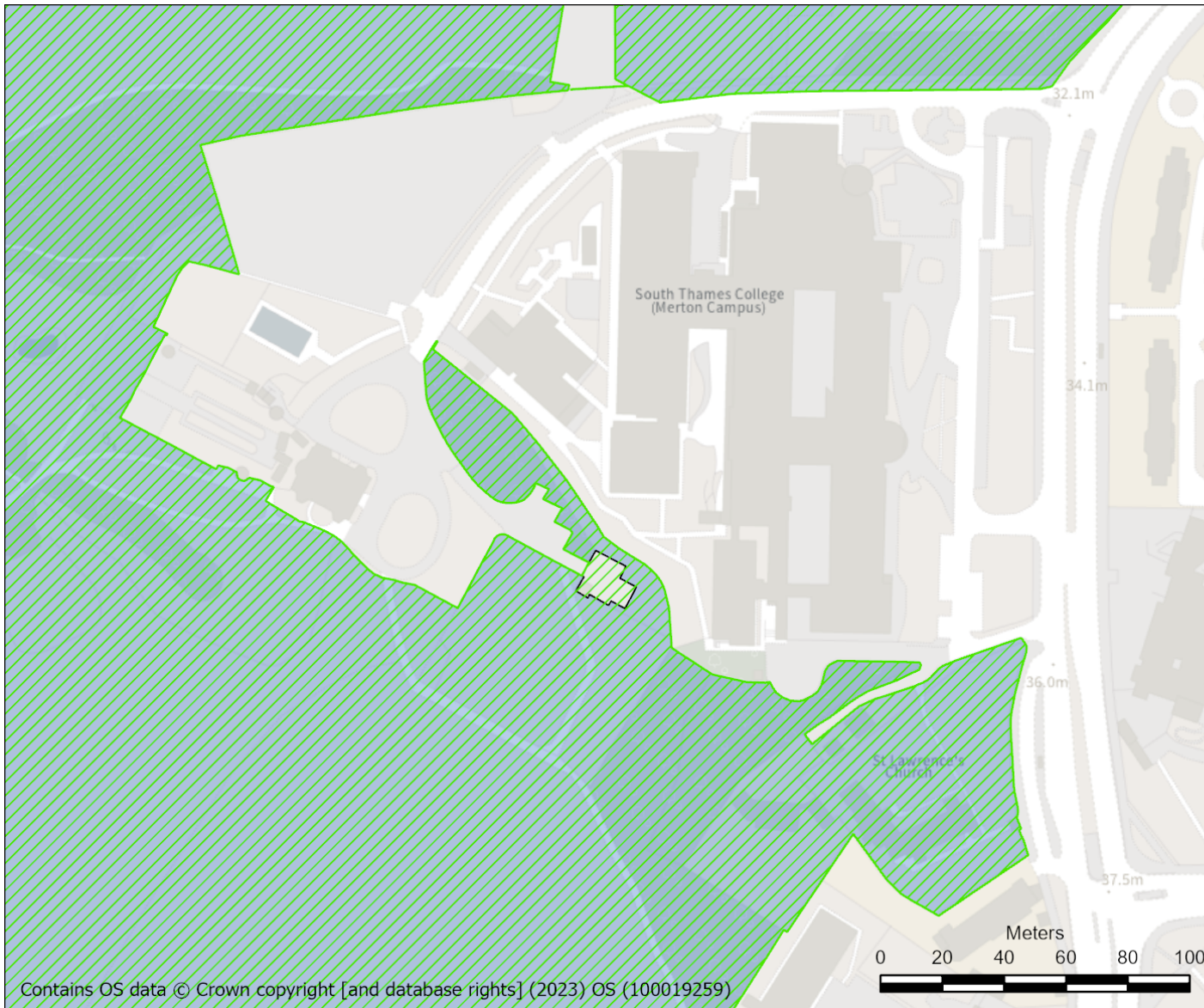


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MM-Green Corridor Map-07a

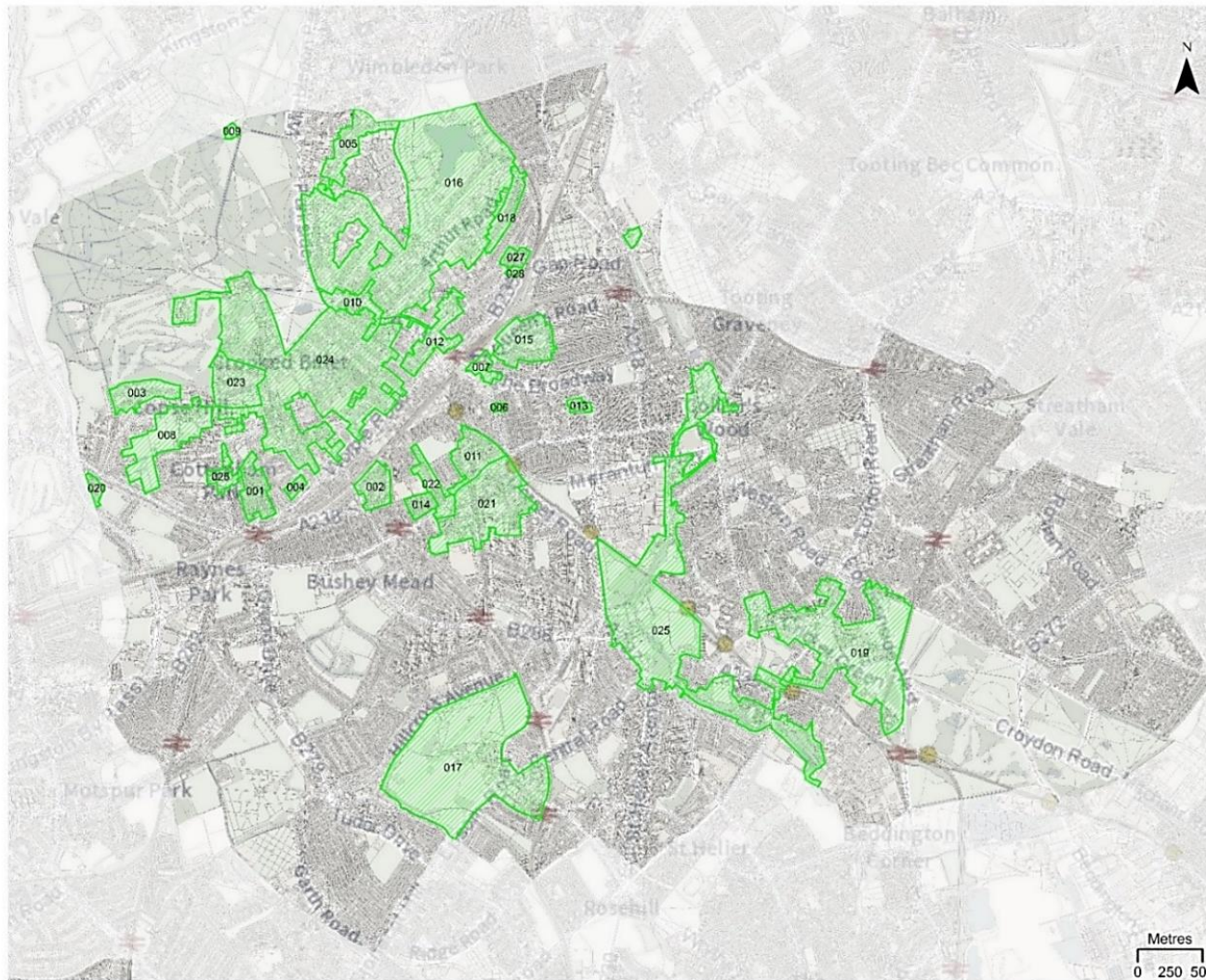
Legend


-  Green Corridors (published July 2021)
-  Green Corridors modified July 2023



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MM-Conservation Areas-Map-09

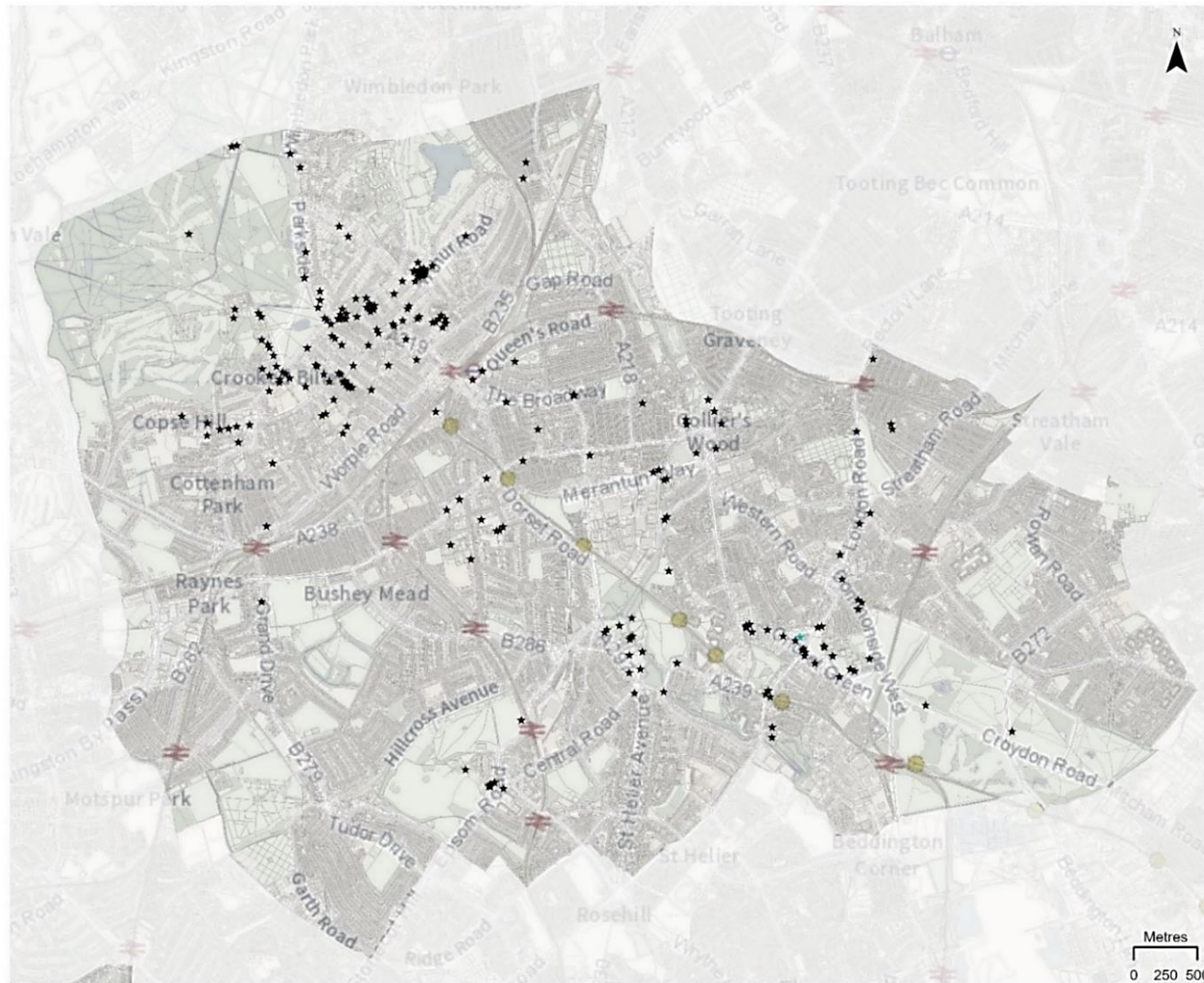


 Conservation Areas

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



MM-Listed Buildings-Map-10

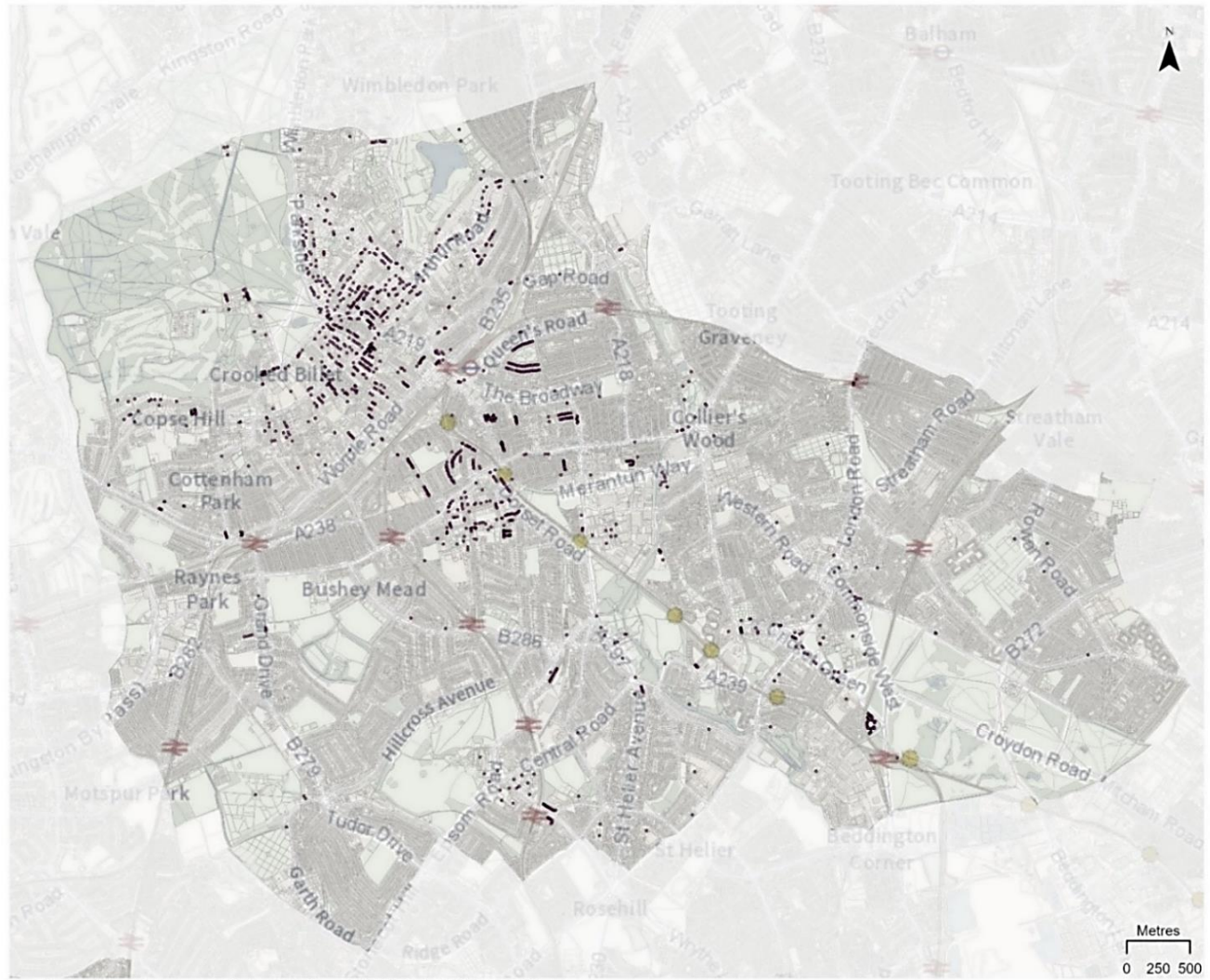


★ Listed Buildings

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MM-Locally Listed Buildings-Map-11

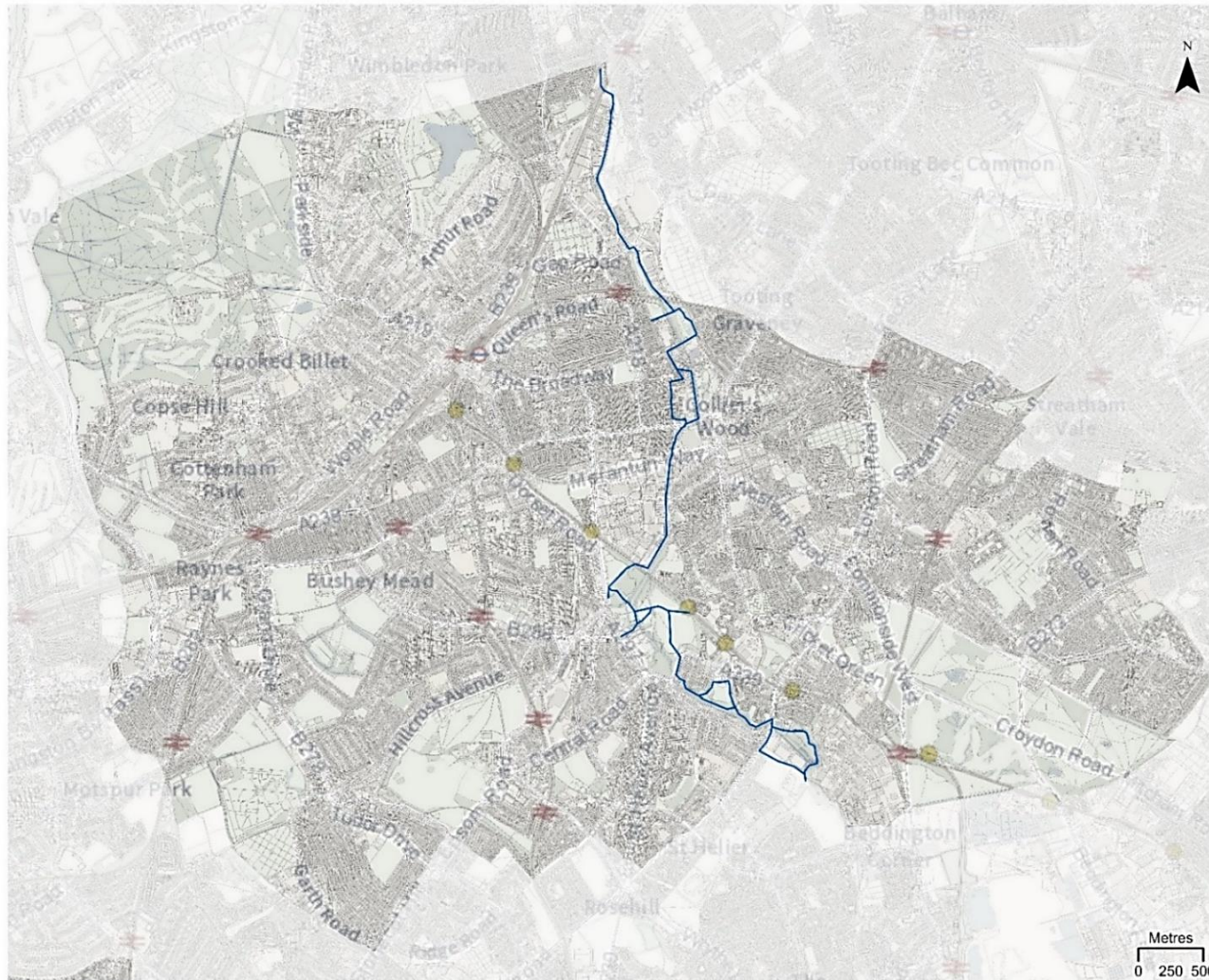


● Locally Listed Buildings



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MM-Wandle Trail/ Cycle Network Route 20 (NCN20)-Map-12

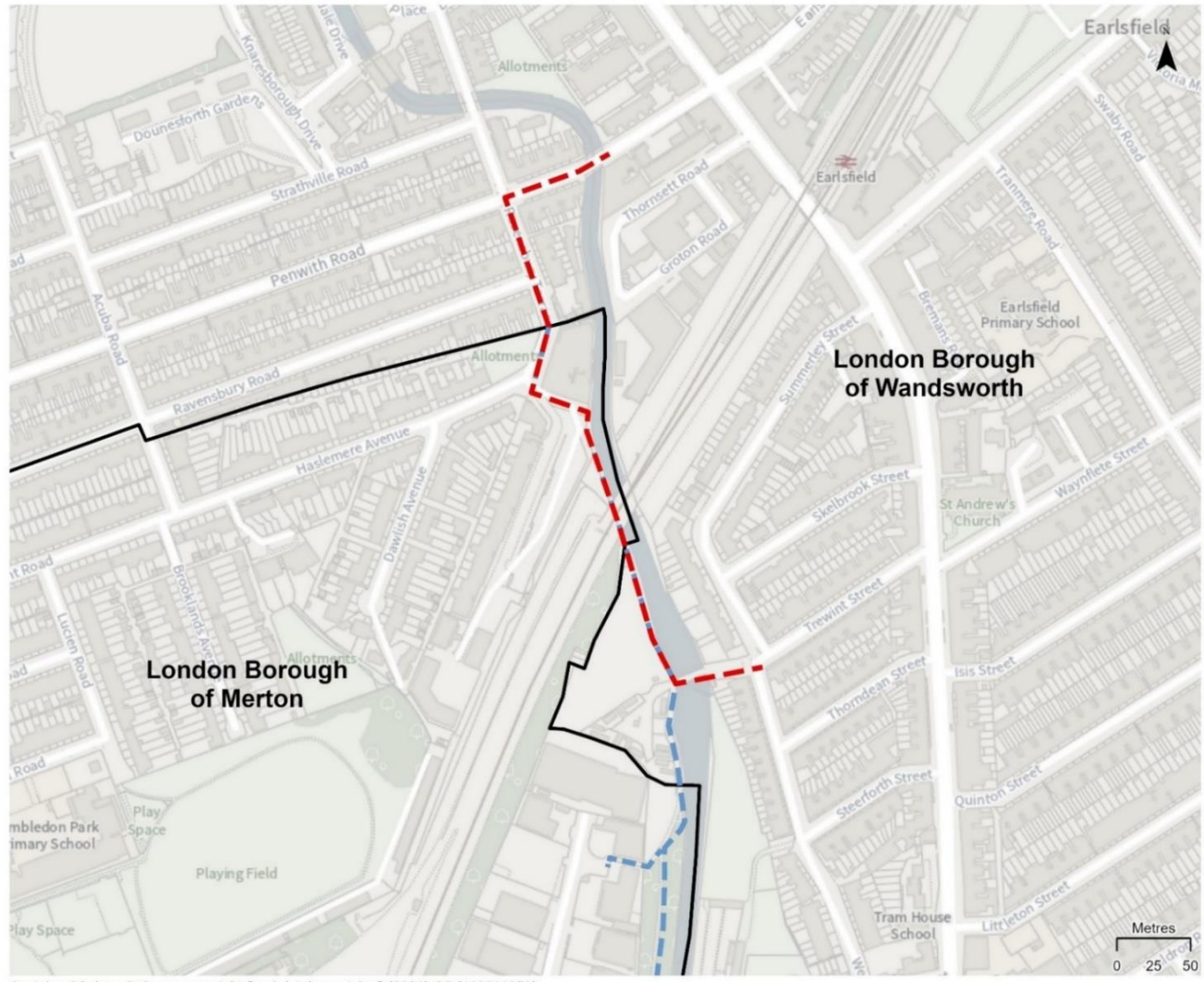


— Wandle Cycle Route

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MM-Wandle Trail proposed 'missing link' route-Map-13





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

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MM- Neighbourhood Parade Map-14

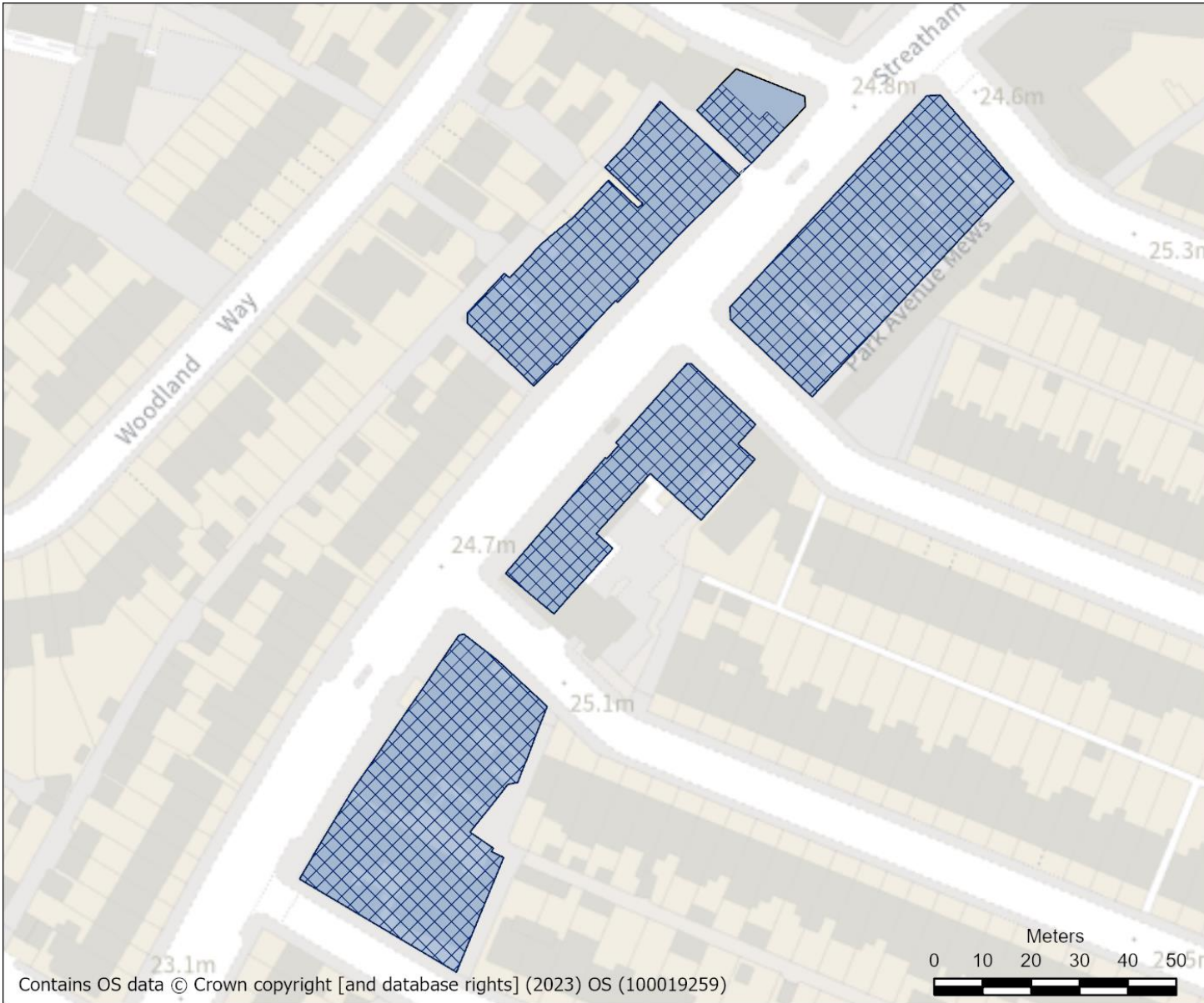
Legend

-  Neighbourhood Parades (Published July 2021)
-  Neighbourhood Parades July 2023



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MM-Neighbourhood Parade Map-15

Legend

-  Neighbourhood Parades (Published July 2021)
-  Neighbourhood Parades July 2023

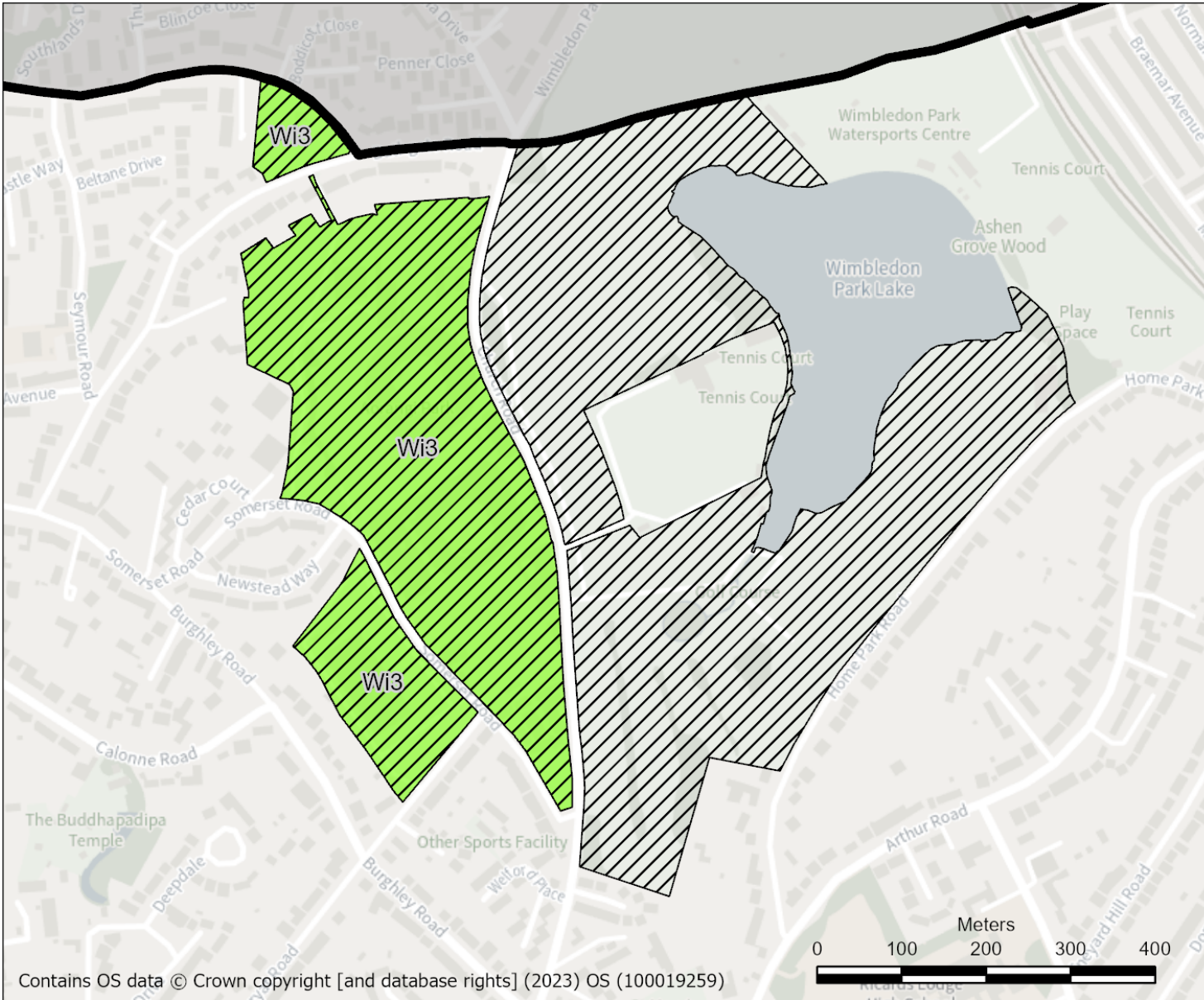


MM-Site Allocation Map-16

Legend




-  Site Allocations (Published July 2021)
-  Site Allocations Modified July 2023





MM-Site Allocation Map-17

Legend

-  Merton Borough Boundary
-  Site Allocations (Published July 2021)
-  Site Allocations Modified July 2023




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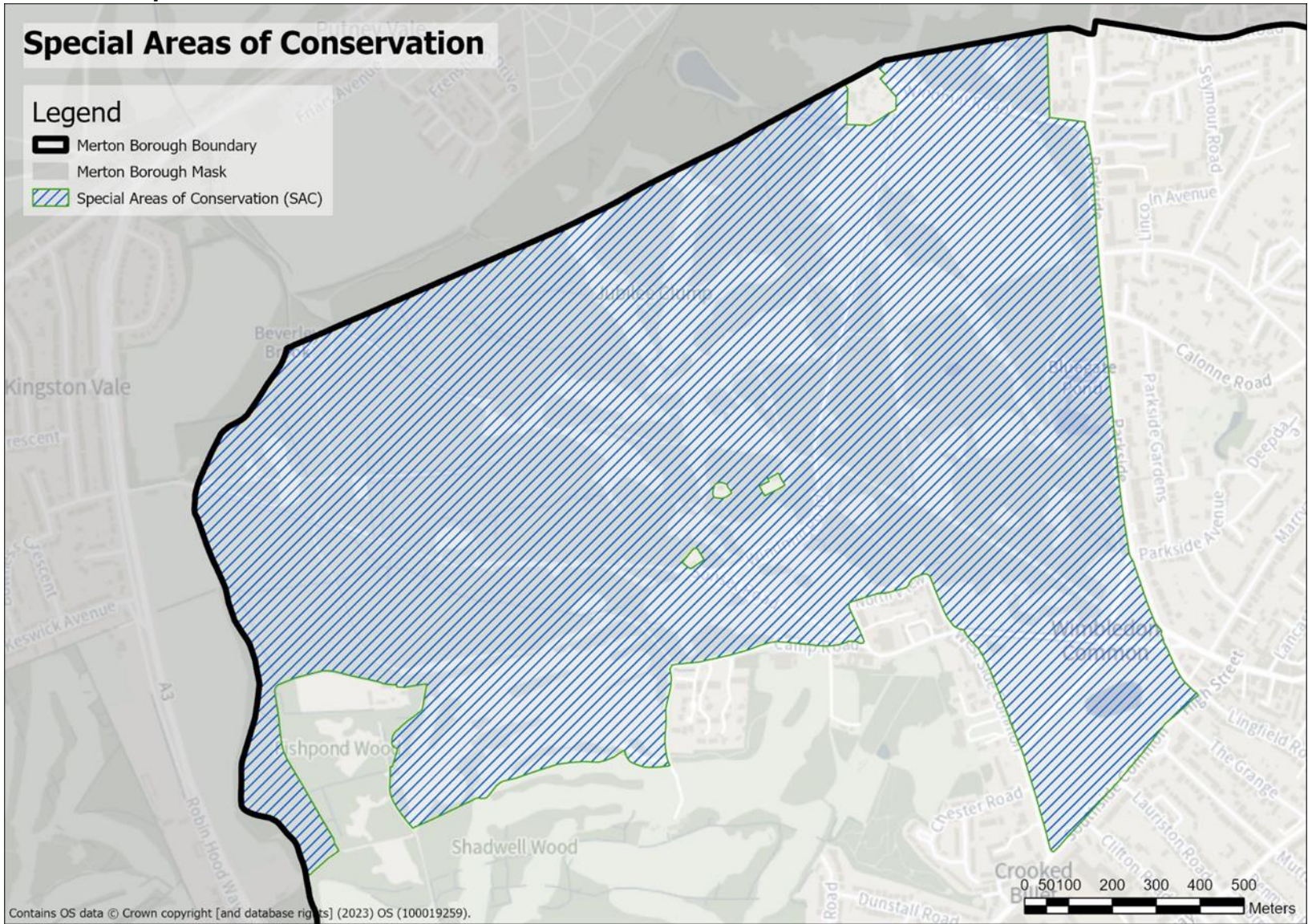


MM-SAC Map

Special Areas of Conservation

Legend

-  Merton Borough Boundary
-  Merton Borough Mask
-  Special Areas of Conservation (SAC)



Appendix B Identified European Site condition assessments.

Figure B1: Wimbledon Common assessment .

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
Dwarf Shrub Heath - Lowland	001	64.2291	0.00	18/07/2013	Unfavourable – Recovering	<p>This is an extensive area with a mosaic of heathland set amongst long-established secondary woodland. Most of the heath is best, described as humid heath as it does not appear to be permanently wet.</p> <p>There are areas which are in good condition, but most of the heath fails to meet key targets. There is no evidence of loss of habitat extent, indeed there has been recent tree and scrub clearance in parts of the unit to promote expansion of heath.</p> <p>Key concerns are low structural and age diversity in the heath vegetation, low cover of bare ground and gaps in the vegetation. The dominant heath species is heather with only very small amounts of cross-leaved heath. The heather is generally in the building/mature, mature growth phase with little in the pioneer stage, and conditions to promote establishment of new generations of heather are currently poor.</p> <p>Habitat structure for invertebrates of tall vegetation and scrub edge is good but there are generally few gaps in the vegetation or areas of bare ground suitable for invertebrates of short turf and sandy soils. The frequency of characteristic associated plants is generally lower than desirable although tormentil, catsear, heath rush, common sedge, mat grass, heath grass and creeping willow are locally frequent. These are all scarce plants in London.</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>Molinia is abundant but overall cover is within target (60%). Cover of bracken is generally low and is well within target overall. Cover of scrub is generally within target, but cover exceeds target in a few places (up to 40%). Cover of common gorse is within target.</p> <p>There are no indications of significant damaging impacts arising from non-native species, drainage, trampling, burning or disturbance.</p> <p>Measures to increase structural and age diversity in the heather, increase the amount of bare ground and gaps, and reduce scrub cover would bring the unit into favourable condition.</p>	
Acid Grassland - Lowland	002	129.3094	0.00	22/07/2013	Unfavourable – Recovering	<p>Includes an extensive area of species-rich acid grassland areas of wet /dry heath, and acid grassland in the areas around the golf course, amongst long-established secondary woodland.</p> <p>Acid grassland is in good condition but most of the heath fails to meet key targets.</p> <p>No evidence of loss of habitat extent, indeed there has been recent tree and scrub clearance in parts of the unit to promote expansion and restoration of heath.</p> <p>Much of the heath has low structural and age diversity, and low cover of bare ground and gaps in the vegetation. Dominant heath species is heather with only very small amounts of cross-leaved heath.</p> <p>Heather is generally in the building/mature growth phase with little in the pioneer stage, and conditions to promote</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>establishment of new generations of heather are currently poor.</p> <p>Habitat structure for invertebrates of tall vegetation, shady woodland and scrub edge is good but there are generally few gaps in the vegetation or areas of bare ground suitable for invertebrates of short turf and sandy soils.</p> <p>Frequency of characteristic associated plants is generally lower than desirable but tormentil, catsear and heath rush are locally frequent.</p> <p>Molinia is abundant but overall cover is within target (60%). Cover of bracken is generally low and is well within target. Cover of scrub is generally within target but exceeds in a few places (up to 20%). Cover of common gorse within target.</p> <p>No indications of significant damaging impacts arising from non-native species, drainage, trampling, burning or disturbance.</p> <p>Measures to increase structural and age diversity in the heather, increase the amount of bare ground and gaps, and reduce scrub cover would bring the heath into favourable condition.</p> <p>Acid grassland meets targets for sward height; amount of leaf litter, cover of bracken, there is a wide range of associated plants including yellow rattle, oval sedge, mat grass, sheep's sorrel and tormentil.</p>	
Broadleaved, Mixed and	006	44.8322	0.00	30/01/2014	Unfavourable - Recovering	This unit contains a small area of acid grassland mainly on areas of rough on golf course.	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
Yew Woodland - Lowland						<p>The grassland fails on high proportion of bare ground (25%) cover of litter (30%), cover of negative indicator species (10%), and just fails on the cover of trees and shrubs. Only one species recorded in sward as occasional. All other targets passed.</p> <p>The sward appears to be suffering from its use as a golf course-this could be through high footfall but also possibly through rolling and fertiliser spread- and management or use of the areas of acid grassland really needs to become less intensive to improve the condition.</p> <p>The Woodland area within this unit was assessed against, the appropriate habitat conditions for the Stag Beetle.</p> <p>Generally, there was a good variation of tree age class across the woodland area but very few veteran or mature trees. There was a good range of decaying wood, but some areas lacked large trunks or dead limbs (Mainly due to the lack of mature trees). The decaying wood was located in a variety of different conditions both warm and wet. Sycamore and Holly management is required; this should be addressed in the current EWGS. Where management/ removal takes place stumps should be treated, in order to prevent Sycamore and Holly regeneration.</p> <p>In areas of heavy recreational use soil compaction is preventing regeneration.</p> <p>Woodland management should focus on Holly and Sycamore removal, identification and management of</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						mature/veterans of the future and management of decaying wood habitat.	
Broadleaved, Mixed and Yew Woodland - Lowland	008	95.395	0.00	30/01/2014	Unfavourable - Recovering	<p>The Woodland area within this unit was assessed against the appropriate habitat conditions for the Stag Beetle. The trees in this unit were, varied in age class, although lacking in veteran and mature trees.</p> <p>Decaying wood was frequent throughout the unit, although the habitat would benefit from having larger stumps either standing or fallen. The decaying wood was situated in a variety of conditions humid, dry and wet offering a variety of decaying habitats. In one area where a heavy thin had taken place, the saplings will need to be retained for succession and mature replacements in years to come.</p> <p>Some areas across the Unit were, choked with Holly but this will be addressed through the EWGS.</p> <p>Rhododendron was also present in some area within the centre of the unit. A very short sward across all grassy areas in this unit of 2-5cm and very few species. Species seen included Dock, Rye Grass and Yarrow- possibly suffering from heavy rabbit grazing and management as part of the golf course. A very small area of heath managed under HLS as restoration in this Unit is looking successful, more restoration patches would be beneficial due to success of current plots</p>	
Dwarf Shrub Heath - Lowland	009	17.6173	0.00	12/09/2013	Unfavourable - No change	<p>This unit contains areas of grassland at the edge of a golf course and areas of heathland in the rough and at the edges of the fairways. Signs of gorse control were visible when visited and the rough areas did not seem to be suffering from significant over management/ high footfall. However, the unit fails on frequency of graminoids and the</p>	Agriculture - inappropriate cutting/mowing.

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>proportion of dwarf shrubs in building/ mature and pioneer stage.</p> <p>The majority of the heather is at pioneer stage suggesting that it has been cut at the same time- however; there is a small proportion of heather at the mature degenerate stage and little encroachment by scrub suggesting that more management that is sympathetic is taking place.</p>	

Source: Natural England compiled June 2021. Unchanged 22 September 2023

Figure B2: Richmond Park assessment

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
Acid Grassland - Lowland	001	114.5283	114.53	27/10/2010	Unfavourable – Recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, Mixed and Yew Woodland - Lowland	002	3.0315	3.03	19/05/2010	Unfavourable - Recovering	<p>The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain all features necessary to support the assemblage.</p> <p>The assessment of the habitat as a whole follow: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole: Scrub - Less than 10% across the site. However, there are several</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is being, addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland cover was 5-10%</p> <p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being, addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being, controlled through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being addressed through a tree-planting program.</p> <p>The unit provides good levels of scrub, lying dead wood but has a closed canopy and is very shaded. Garden escapes and rhododendron are a problem.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
Acid Grassland - Lowland	004	153.6174	153.62	27/10/2010	Unfavourable - Recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Acid Grassland - Lowland	005	205.2137	205.21	27/10/2010	Unfavourable - Recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, Mixed and Yew Woodland - Lowland	006	29.3364	29.34	18/05/2010	Unfavourable - Recovering	<p>The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole:</p> <p>Scrub: Less than 10% across the site. However, there are a number of enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is being, addressed through a program of tree planting.</p> <p>Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland cover was 5-10%</p> <p>Negative factors: Rhododendron cover in many of the enclosed woodlands. This is being, addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being, controlled through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being, addressed through a tree-planting program.</p> <p>The unit provides nectar sources: bramble, rhododendron and has a high proportion of young oak and birch trees but few saplings</p>
Broadleaved, Mixed and Yew Woodland - Lowland	007	4.6562	4.66	19/05/2010	Unfavourable - Recovering	<p>The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain all features necessary to support the assemblage.</p> <p>The assessment of the habitat as a whole follow - SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole- Scrub: Less</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>than 10% across the site. However, there are a number of enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting.</p> <p>Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland cover was 5-10%</p> <p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled, through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being addressed through a tree-planting program. The unit provides good levels of scrub and has a good age structure. Overall volume of fallen timber is high</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
Broadleaved, Mixed and Yew Woodland - Lowland	009	7.8647	7.86	19/05/2010	Unfavourable - Recovering	<p>The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain all features necessary to support the assemblage.</p> <p>The assessment of the habitat as a whole follow - SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole -Scrub: Less than 10% across the site. However, there are a number of enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is being, addressed through a program of tree planting.</p> <p>Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland cover was 5-10%</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being, addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being, controlled, through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being, addressed through a tree-planting program.</p> <p>The unit provides good levels of scrub, young and middle-aged trees. Ground flora provides good nectar sources. Rhododendron is a problem in this unit.</p>
Acid Grassland - Lowland	010	205.1277	205.13	27/10/2010	Unfavourable – Recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, Mixed and Yew Woodland - Lowland	011	5.8234	5.82	19/05/2010	Unfavourable - Recovering	<p>The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole- Scrub: Less than 10% across the site. However, there are a number of enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>being, addressed, through a program of tree planting.</p> <p>Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland cover was 5-10%</p> <p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being, addressed, through a program of clearance. High bracken coverage increases fire risk. Bracken is being, controlled through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being, addressed, through a tree-planting program.</p> <p>The unit provides good levels of scrub, young and middle-aged trees. Ground flora provides good nectar sources. Little dead wood evident, however abundant dead wood attached to trees.</p>
Broadleaved, mixed and yew woodland -	012	22.5203	22.52	19/05/2010	Unfavourable - Recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
Lowland						<p>all features necessary to support the assemblage. The assessment of the habitat as a whole follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole - Scrub: Less than 10% across the site. However, there are a number of enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is being, addressed through a program of tree planting.</p> <p>Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland cover was 5-10%</p> <p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being, addressed through a program of</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>clearance. High bracken coverage increases fire risk. Bracken is being, controlled through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being, addressed, through a tree-planting program.</p> <p>The unit provides good nectar sources through planted shrubberies. There are many planted saplings and middle-aged trees but few old/veteran trees. Dead wood resource was scarce</p>
Acid Grassland - Lowland	013	57.2035	57.20	27/10/2010	Unfavourable - Recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, Mixed and Yew Woodland - Lowland	014	18.7478	18.75	19/05/2010	Unfavourable - Recovering	<p>The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole - Scrub: Less than 10% across the site. However, there are a number of enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is being, addressed through a program of tree planting.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland cover was 5-10%</p> <p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being, addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being, controlled through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being, addressed through a tree-planting program. The unit provides good dead wood resource - lying fallen timber, stumps and loggeries. There is a poor scrub layer and few saplings/young trees. Nectar sources are in short supply. Rhododendron is present but not widespread.</p>
Broadleaved, Mixed and Yew Woodland - Lowland	015	18.7614	18.76	19/05/2010	Unfavourable - Recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such, the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follow-

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole - Scrub: Less than 10% across the site. However, there are a number of enclosures, which have allowed the development of hawthorn and gorse scrub for example.</p> <p>Tree age structure: Across the site, there are fewer saplings than veteran trees. There are greater than 25% of middle-aged trees as there are veterans. The shortage of saplings is being, addressed through a program of tree planting.</p> <p>Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland; cover was 5-10%.</p> <p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being, addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being, controlled through herbicide spraying and periodic rolling.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>Poor age structure of trees: This is being, addressed, through a tree-planting program.</p> <p>The unit provides good dead wood resource - a high proportion of trees have signs of decay/hollowing and the quantity of fallen timber is good. Many of the logs are in open and dappled conditions. Scrub resource is poor.</p>

Source: Natural England compiled September 2023.

Appendix C: Informative 'European Sites' and European Directives.

- 1.1. On 1st January 2021 changes to the Habitats Regulations 2017 came into force. These changes reflect the UK's departure from the EU (European Union). More information can be found here: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>
- 1.2. The council does not consider that these changes affect the overall approach to Merton's Habitats Regulations Assessment (HRA). HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK (United Kingdom): Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). These used to be classified under European Union (EU) legislation; since 1 January 2021 these are protected in the UK by the Habitats Regulations 2017 (as amended).
- 1.3. Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still refer to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:
 - SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive) and species (Annex II).
 - SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive), and for regularly occurring migratory species not listed in Annex I
- 1.4. The term '*European sites*' was previously commonly used in HRA to refer to 'Natura 2000' sites and Ramsar sites (international designated under the Ramsar Convention). Government's January 2021 publication "changes to the Habitats Regulations 2017 sets out the differences between the 2017 Regulations and the post-Brexit situation:
 - References to Natura 2000 in the 2017 Regulations should now refer to the 'national site network'.
 - The national site network includes existing SACs and SPAs and new SACs and SPAs designated under these Regulations.
 - Ramsar Sites (also known as designated Wetlands of International Importance) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or varied species and habitats.
- 1.5. Although Ramsar sites do not form part of the new national site network, the government's January 2021 paper confirms that all Ramsar sites remain protected in the same way as SACs and SPAs.
- 1.6. The [National Planning Policy Framework \(2023\)](#) paragraph 187 states - The following should be given the same protection as habitats sites:
 - a) potential Special Protection Areas and possible Special Areas of Conservation;
 - b) listed or proposed Ramsar sites; and
 - c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

- 1.7. Legally HRAs are not required other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves. Many HRAs including Merton's HRA, that were prepared for plans or projects developed on either side of the January 2021 changes continue to use the term 'European sites' rather than 'national site network' for consistency during HRA preparation. As set out above, this does not change the overall approach to the HRA.
- 1.8. The Water Framework Directive (WFD) requires EU Member States to assess and manage the water environment in the European Union (EU), through a six-yearly cycle of planning and implementing measures to protect and improve the water environment. Since the UK left the EU, the EU Water Framework Directive has been revoked and replaced in England Wales and Northern Ireland by the following laws: the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, and the Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017. In Scotland, the WFD has been transposed into the Water Environment and Water Services (Scotland) Act 2003. The UK continues to fulfil its reporting requirements under the new legislation. For ease of reference this legislation will be referred to as the WFD throughout this document.