

LBM35 Health Impact Assessment for Main Modifications (post hearings)
Merton's draft Local Plan

January 2024



1. Introduction

- 1.1. This Health Impact Assessment (HIA) is assessing the potential impact of proposed Main Modifications (MMs) to Merton's Local Plan (hereby referred to as the Plan) following, the Public Hearings held in June and October 2022, the Planning Inspectors Post Hearing Letters dated March 2023 ([INSP22](#)) and the Post Hearing confirmation letter dated April 2023 ([INPS23](#)).
- 1.2. A Health Impact Assessment ([OD11](#)) report was submitted alongside the Plan. Throughout the HIA process the council worked with Merton's Public Health teams and other health bodies for example the National Health Service (NHS). The council has engaged and consulted with health bodies and organisations from the start and incorporated advice/recommendations received where appropriate.
- 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). Additional modification is not being assessed as part of this HIA as they do not relate to soundness.

2. What is the purpose of Health Impact Assessments (HIA)?

- 2.1 The World Health Organization (WHO) defines an HIA as a combination of process and methods used by those planning, deciding, and shaping changes to the environment to evaluate the significance of health effects of a plan or project. A HIA helps decision makers in local authorities and other stakeholders make choices and actions to best prevent ill health, promote good health and reduce health inequalities. When applied in the planning system, an HIA puts people's health and wellbeing at the heart of the process.
- 2.2 The NPPF sets out the government's planning policies and how they should be applied. It requires planning policies and decisions to *"enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs."* It also emphasises that the level of detailed supporting information provided to local authorities should be relevant, necessary and material, and that having the right information is crucial to good decision-making. The supporting National Planning Policy Guidance (PPG), "healthy and safe communities" chapter suggests the use of HIA can be beneficial "where there are expected to be significant impacts".

3. Health and wellbeing

What is a healthy community?

- 3.1 A healthy community is a good place to grow up and grow old in. It is one which promotes healthy behaviours and supports reductions in health inequalities. It should enhance, improve and support physical and mental health of the community.

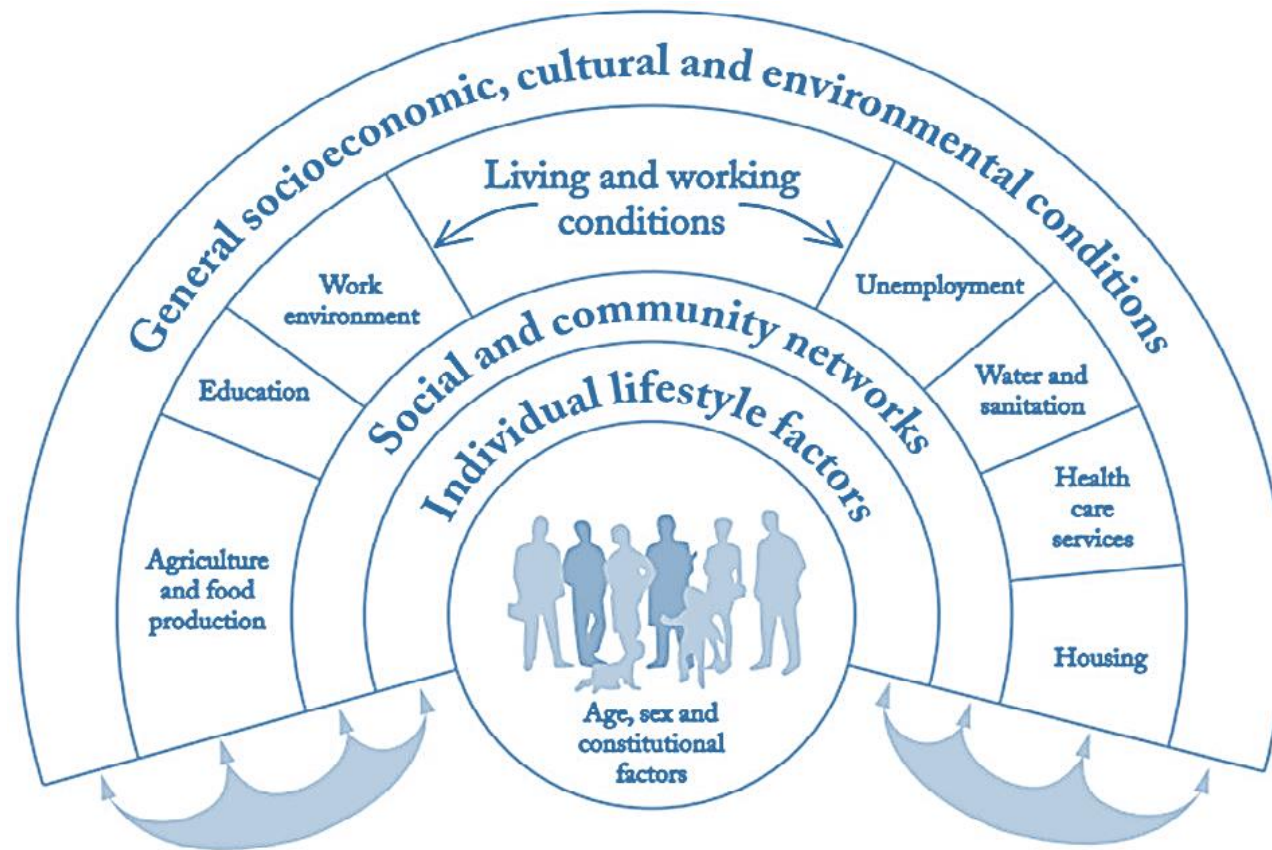
Active healthy lifestyles - made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing; and is accessible by walking, cycling and public transport.

The creation of healthy living environments for people of all ages – its supports social interaction, from children and young people by way of play and exploring for example through accessible and safe blue and green infrastructure. Making our town centres adaptable and accessible by way of layout and design for our elderly population and the increase of people living with dementia and other sensory or mobility impairment

What are the wider determinants of health?

- 3.2 The health and wellbeing of people and communities is influenced by a wide range of factors, the majority of which lie outside of the health service. These are the wider determinants of health.

Figure 1: Determinants of health and wellbeing in our neighbourhoods (Barton and Grant based on Dahlgren and Whitehead)



4. The Plan

- 4.1 The aim of the Plan is to shape how the borough will develop, look and grow. Importantly, it will be used to help planning proposals and other planning related decisions. It is the local guide to what can be built where, shaping infrastructure, investments and determining the future pattern of development in the borough.

- 4.2 The Local Plan has been informed and influence by several health plans/strategies for example (not an exhaustive list):
- [Merton's Joint Strategic Needs Assessment \(JSNA\)](#): looks at the current and future health and care needs of local populations to inform and guide the planning and commissioning (buying) of health, wellbeing and social care services within a local authority area.
 - [The Merton Story](#): is part of the JSNA, it an annual snapshot of what Merton is like as a place to live, the key risk factors for health and wellbeing through the life course, and important health outcomes and health inequalities that exist between different population groups, as identified through the ongoing JSNA process.
 - [Merton's Health and Wellbeing Strategy 2019-24](#): seeks to ensure key partners work together to make Merton a healthy place by creating the physical and social conditions for all people to thrive, and to complement the provision of holistic health and care services. Its seeks that we all start well, live well, age well in a healthy place
- 4.3 A key document that has influence and is embedded throughout the Plan is [Merton's Community Plan \(2020-26\)](#). It sets out the Merton Partnership's long-term ambitions for the borough and the overall direction and priorities that the partnership will focus on. It sets out the key priorities that the members of the Merton Partnership want to work on together. The overarching priority for the Community Plan is to increase community participation in Merton as a driver to improving resilience and wellbeing, focussing on those parts of the borough with the poorest outcomes. It highlights how adopting a collective approach can help to better achieve the ambitions of the people who live and work in the borough.

5. Conformity to national and regional planning policies

- 5.1 The Plan must be in conformity with national (National Planning Policy Framework) and regional (London Plan) development planning policies and their associated guidance and strategies.
- 5.2 The London Plan is legally part of each London, Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. All Development Plan Documents and Neighbourhood Plans must be 'in general conformity' with the London Plan.
- 5.3 The London Plan seeks to develop an approach tailored for London to reflect the circumstances in the capital and is the key document shaping planning decisions across Greater London region. It provides a suitable spatial strategy that plans for London's growth in a sustainable way.

5.4 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared planning plans can be produced. Planning law requires that applications for planning permission be determined in accordance with development planning Plans. It further states the NPPF must be considered in preparing the development plan (for example Local Plans) and planning policies and decisions must also reflect relevant international obligations and statutory requirements. The need for local authorities to be in conformity with national and regional planning policies sets the context of planning policies at a local level.

6. Local Plan incorporated approaches

6.1 Throughout the Local Plan several credited and established design and planning approaches have been adopted which look to improve health (including mental health) and wellbeing, reduce health inequalities, enable behaviour changes, create healthy and inclusive environments, support COVID-19 recovery, strengthen and support resilience.

6.2 The Local Plan is guided by the [National Planning Framework](#) and its supporting documents, the [London Plan](#) and its supporting guidance, published guidance from health bodies for example UK (United Kingdom) Health Security Agency (UKHSA) and planning and design professional bodies/organisations for example the [Royal Town Planning Institute \(RTPI\)](#), [Town and Country Planning Association \(TCPA\)](#) and [Design Council](#). Some of the approaches incorporated in the Local Plan include the following issues.

6.3 **20 Minute neighbourhood** is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and can use the services they need to use day to day – shopping, school, community and healthcare facilities, places of work, green spaces and more.

Figure 2: Town and Country Planning Association (TCPA) 20 Minutes Neighbourhood feature



6.4 [Sport England's Active Design](#) 10 principles and guides are already, embedded within overlapping disciplines related to open space and landscape, transport, access and design and layout.

6.5 The Active Design principles cover:

Activity for all neighbourhoods

Walkable communities

Connected walking and cycling routes

Co-location of community facilities

Network of multifunctional open space

High quality streets and spaces

Appropriate infrastructure

Active buildings

Management, maintenance, monitoring and evaluation

Activity promotion and local champions

- 6.6 The principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.
- 6.7 [Transport for London Healthy Streets Approach](#) help create a vibrant, successful city where people can live active, healthy lives. The Healthy Streets Approach looks to make our neighbourhoods a healthier, more sustainable, safer and more connected. The easiest way for to stay active is by walking or cycling as part of our daily travel. Several policies in the Local Plan look to deliver and have incorporated the Healthy Streets Approach such as the transport, design and green infrastructure. Our local plan has embedded Health Street Approach throughout.

Figure 3: Transport for London: Healthy Streets Approach indicators



- 6.8 **Dementia Friendly design:** The council is an active member of the Merton Dementia Action Alliance (MDAA). In June 2018, the MDAA was recognised with the official '[Working Towards a Dementia Friendly Community](#)' status, in recognition of the work done by members over the past two years.
- 6.9 The ambition for the borough is to become a Dementia Friendly borough. The Local Plan recognises and acknowledges the importance of incorporating dementia design approaches within development and environment. These approaches aim to create inclusive environments/neighbourhoods which will help reduce stigma and supported people living with dementia and many other impairments including people with physical and sensory impairments, neurodiverse people (including autism), people with learning disabilities and mental health service users.

7. The Local Plan urban objectives and spatial vision

- 7.1 The five Strategic Objectives apply to the whole of Merton and provide a framework for the Local Plan, acting as steppingstones to deliver the Spatial Vision. Consultation responses, [Merton's Community Plan](#) and the [London Plan](#) (2021) have guided Merton's strategic objectives. these stay unchanged.

- Strategic objective 1: Tackling climate change.
- Strategic objective 2: Supporting resilience.
- Strategic Objective 3: Places for people.
- Strategic objective 4: Good growth.
- Strategic objective 5: Place plans and the 20-minute neighbourhood.

8. Proposed Modifications summary

- 8.1 As reported earlier in this report, this HIA is only assessing the proposed 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 Letters (INSP22 and INSP23). A full list of all the proposed modifications can be found in LBM29.

Screening of Proposed Main Modifications (MMs)

- 8.2 MMs are material changes to the submitted plan which are necessary to make it *sound* and *legally compliant*. The council has screened the proposed MMs to determine if they significantly affect the findings of the submission HIA

Report and if further appraisal work is required. The proposed changes and findings of the screening including the rationale for screening 'out' (no implication for the submission HIA findings) or screening 'in' (assessment required). The full assessment findings are provided in Appendix A of this report.

- 8.3 Overall, most of the MMs involve relatively minor changes for reason of soundness. This meant adding clarification or enhance readability or updating factual information already presented in the Plan. The screening of the proposed MMs found that there is no significant effect on the findings of previous HIA work presented in the submission HIA (including updates and HIA carried out at various stages of the Plan's development, when needed). This is because the changes do not fundamentally alter the direction of the Plan, its aims or objectives, but are proposed on the ground of soundness.

Proposed Modifications summary

- 8.4 This section provides a summary of the proposed MMs. As reported earlier in this report it is focused on the MMs the council are making to the Plan, relating to the Hearings (June and October 2022), 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

- 8.5 The Inspectors letter recommended that a number of Additional Modification proposed by the council should be Main Modification due to the weight of the change and/or edit. The council has excepted these recommendations. It should be noted the alterations do not change the direction of the Plan.

Site allocations

- 8.6 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 site allocation Wi3. Initially, the council was proposing a large site area incorporating part of Wimbledon Park. However, following the Planning Inspectors requirements in the Post Hearing letter (April 2023), the council is now proposing a smaller site allocation boundary area excluding the park and incorporating a policy for Wimbledon Park.

Plan period

- 8.7 The council is proposing a change to the Plan period to improve accuracy, ensure 'Soundness' and complying with the NPPF (para 22) requirements. 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 the years 2021/22 - 2037/38. This is in keeping with NPPF requirements.

8.8 NPPF paragraph 22 states that:

Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

8.9 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 – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

8.10 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.

8.11 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 (LBM29). It covers a 17 years 2 addition year and over the Plan period.

8.12 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.

8.13 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.

- 8.14 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 4: Merton’s stepped housing delivery

Year	Target
2021/22	918
2022/23	500
2023/24	450
2024/25	700
2025/26	725
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

- 8.15 The additional new homes will be delivered 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. The council believes this is an appropriate approach to take to ensure deliver of new homes for Merton.

- 8.16 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 SA and other environmental assessments. If found the plan has a wide range of positive and significant positive effects on the objectives.
- 8.17 The Plan has taken on broad the key sustainability issues in a manner that maximises the benefits of sustainability and avoids adverse sustainable impacts not only for the residents on the estates but also the surrounding area (residential and commercial) and the environment both physical and natural.
- 8.18 The three estate will result in an uplift of over 2,000 new homes. In general the draft Plan (February 2016) has been found to have a wide range of positive and significant positive effects on the objectives. The Plan has taken on broad the key sustainability issues namely in a manner that maximises social, environment and economic benefits and importantly, avoids adverse impacts. Not just for residents on the living on the estates but with regard to the surrounding area.
- 8.19 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. 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.

Housing development policies

- 8.20 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.

- 1.4. A modification 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

- 8.21 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)

- 8.22 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 more importantly, actions the council will take for example a full or partial review of the Plan. The performance and implementation of the policies will be reported in Merton’s [Authority Monitoring Report \(AMR\)](#).

Tall buildings clusters and their environments development policies

- 8.23 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.
- 8.24 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

- 8.25 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.
- 8.26 All proposed changes the Wimbledon Park MOL 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.
- 8.27 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

- 8.28 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 HIA.

Climate change development policies

- 8.29 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. The results of this review were published in the [Delivering Net Zero](#) study in May 2023.
- 8.30 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.

- 8.31 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
- 8.32 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 discussion in the relevant sub heading in this section.
- New policy Wimbledon Park development policy – N8.1*
- 8.33 The council is proposing a new policy to cover the whole of 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 190. It should be noted that the policy only covers the part of the Wimbledon Park Registered Park and Garden that lies with the London Borough of Merton as Local Planning Authority.
- 8.34 As this is a new policy it has not been assessed as part of the SA process before. 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 significance. 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.

Conformity to national and regional planning policies

- 8.35 The Plan is required to be in conformity and to have regard to the NPPF and the London Plan. The London Plan is legally part of each London borough's Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. All Development Plan Documents and Neighbourhood Plans must be 'in general conformity' with the London Plan.
- 8.36 The London Plan seeks to develop an approach tailored for London to reflect the circumstances in the capital and is the key document shaping planning decisions across Greater London region. It provides an appropriate spatial strategy that plans for London's growth in a sustainable way. The London Plan is part of Merton's statutory Development Plan. The policies are written in a way that allows London to implement the ambitions, aims and objectives of the London Plan. There is no requirement for the policies to be repeated at the local level. However, in some instances a local approach is required within the context of the overall policy. The London Plan clearly sets out where this is the case by providing instruction to London boroughs.
- 8.37 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared planning plans can be produced. Planning law requires that applications for planning permission be determined in accordance with development planning Plans. It further states the NPPF must be taken into account in preparing the development plan (for example Local Plans) and planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 8.38 The need for local authorities to be in conformity with national and regional planning policies sets the context of planning policies at a local level. Thus, in turn can limit the reasonable alternative(s) a borough can pursue. Any deviation from national and regional policy must be supported by robust evidence, which shows a just reason for the deviation.
- 8.39 As part of the Plans development the council has engaged with the Greater London Authority (including Mayoral offices – e.g Transport for London) on aspect of the Plan's policy direction and conformity. The GLA have confirmed the Plan is in 'general conformity' with the London Plan. It is the role of the Planning Inspectors to determine if the Plan is in conformity with the NPPF (Sound) only then can the council adopt it.

9. Health impact assessment

9.1 The submission (OD11) HIA was influenced by London Healthy Urban Development Units (HUDU): Rapid Health Impact Assessment Tool developed as a tool to assess the health impacts of the Plan. Overall, the submission HIA remain unchanged. However, the council is proposing a new policy Wimbledon Park 9.2 which has not been assessed.

New policy Wimbledon Park N9.2

9.2 The council is proposing a new policy (9.2d) following discussions that took place during the Hearings and importantly with regard to the NPPF chapter Considering Impacts, which provides context. It should be noted the policy only covers the part of the park that is in Merton's geographical boundary. As this is a new policy it has not been assessed as part of the HIA process before. The policy aims to deliver social, culture, economic and environmental benefits which can help to conserve and enhance the historic park and lake and, crucially provide opportunities to remove the park from Historic England's Heritage at Risk register.

HIA findings

9.3 There are no adverse impacts. The policy meets the HUDU Access to open space and nature, and climate change assessment criteria namely a positive impact. Together with other policies is in keeping with the aims and objective of the draft Plan.

10. Conclusion

10.1 This HIA concludes that the proposed MMs do not have any adverse impact on health and wellbeing (including mental health) for the following reasons:

- The direction aims and objectives of the Plan have not changed.
- Health in all policies is still embedded in the Plan.
- The MMs ensure the Plan is justified, 'Sound' and improve the effectiveness of the Plan.
- The proposed MMs are not anticipated to have any negative effects on the health and wellbeing of Merton's residents.

10.2 The Plan has been subject to other assessments such as Strategic Environment Assessment which considers human health, Sustainability Appraisal and Habitats Regulation Assessment both look at some of the wider determinates of health such as air quality, housing (including affordable), design, green infrastructure, socio- economic and education.

10.3 The council concludes the findings of the submission HIA remain and no further HIA work is required.