



The Planning  
Inspectorate

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# **Report to the London Borough of Merton Council**

**by Linda Wride Dip TP MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date: 7<sup>th</sup> June 2011**

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE  
MERTON CORE PLANNING STRATEGY 2010**

**DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 18 November 2010

Examination hearings held between 9 and 17 February 2011

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## **ABBREVIATIONS USED IN THIS REPORT**

AA	Appropriate Assessment
BRE	Building Research Establishment
BREEAM	BRE Environmental Assessment Method
CS	Core Strategy
DPD	Development Plan Document
GLA	Greater London Authority
GTAA	Gypsy and Traveller Accommodation Assessment
IC	Appendix C
LDS	Local Development Scheme
LSIS	Locally Significant Industrial Sites
MOL	Metropolitan Open Land
PC	Proposed Change
PPS	Planning Policy Statement
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SIL	Strategic Industrial Locations
SME	small and medium enterprises
SPD	supplementary planning guidance
TfL	Transport for London
UDP	Unitary Development Plan

## **Non-Technical Summary**

This report concludes that the Merton Core Planning Strategy Development Plan Document provides an appropriate basis for the planning of the borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Clarifying how the need for Gypsy and Traveller accommodation in the borough will be assessed and how any identified need will be met
- Supporting the protection and enhancement of open space in the borough, but deleting conditional support for educational development which results in the loss of open space
- Making limited amendments to ensure that the policy on centres is consistent with national guidance, and adding clarity about the aims for individual centres in the borough hierarchy and the circumstances when a retail impact assessment will be required
- Supporting the general restrictions on uses acceptable in Local Strategic Industrial Areas, whilst recognising that circumstances may justify widening the range of acceptable uses on specified sites
- Ensuring that the intention to continue to drive up standards of sustainable construction and design is clearly signalled and clarifying how the delivery of carbon dioxide emission reduction targets will be monitored
- Highlighting where other Development Plan Documents and Local Development Framework documents will be the main vehicles for delivering certain policies or providing detailed information about how these strategic policies will be taken forward
- Incorporating explicit references to Tall Buildings guidance in the overarching design policy and in the text supporting sub-area policies
- Ensuring that infrastructure project planning is comprehensive and up-to-date and explicitly recognises the importance of partnership working, including the role of community groups, in infrastructure delivery
- Ensuring that there are clear arrangements for monitoring, including transparent targets, measurable outcomes, a defined range of acceptable deviation against performance targets and associated triggers for contingency planning

Most of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

## Introduction

1. This report contains my assessment of the 2010 Merton Core Planning Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted Core Planning Strategy (November 2010). This is the same as the version for consultation during August/September 2010, with the addition of a number of changes (shown as "tracked changes") which were proposed by the Council in response to representations on the consultation version. Further changes were suggested by the Council in hearing statements and in the course of the hearings. All changes proposed by the Council since the public consultation in August/September 2010 have been consolidated into a single schedule. I have used this consolidated schedule when distinguishing between minor changes and those which go to the heart of soundness.
3. My report deals with those changes that are needed to make the DPD sound. These are identified in bold in the report. Most of these changes have been proposed by the Council (**PC**) and are presented in Appendix A. The changes that I recommend are set out in Appendix C (**IC**). None of these changes undermine the sustainability appraisal and participatory processes undertaken.
4. Some of the changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although I endorse the Council's view that they improve the plan. These are shown in Appendix B. I am content for the Council to make any additional minor changes to page, figure, paragraph numbering and to correct any spelling or grammatical errors prior to adoption.
5. Where the Council has proposed changes that go to soundness, they have been subject to public consultation and I have taken the consultation responses into account in writing this report. The examination was still open when the Government announced the "Planning for Growth" policy. Parties were given the opportunity to make further submissions in the light of this Government announcement. The Council responded to the four further submissions that were made. I have taken this additional material into account in this report.

## Assessment of Soundness

### *Preamble*

6. The Government's intention to abolish Regional Spatial Strategies does not apply to London. The Core Strategy (CS) must therefore be in general conformity with the London Plan. The Examination in Public (EiP) of the Replacement London Plan took place over the summer of 2010 and concluded in December 2010, after the Core Strategy had been submitted for examination.

7. As the report following the EiP has not yet been made public by the GLA, no parties were aware of the Panel's views when statements were prepared and the CS hearings were taking place. However, few of the Panel's recommendations are directly relevant to the Merton CS. In my view, none of the Panel's recommendations have implications for the CS that are so significant as to justify reopening the hearings, notwithstanding the fact that the Mayor's response to the Panel's report is not known at the time of writing.
8. In setting out its spatial strategy policies, the Council has chosen to present detailed area-based policies before the chapters on over-arching generic themes such as housing, transport and climate change. This makes it difficult on first reading the DPD to appreciate the overall context within which the sub-areas exist and how a particular strategy for a sub-area contributes to the implementation of the Core Strategy as a whole. It also results in the need for frequent cross-references in the chapters on sub-areas to matters which are dealt with in broader terms in subsequent chapters. This has a knock-on effect when dealing with changes which go to the heart of soundness.
9. Where a number of related changes in different chapters go to the soundness of a particular issue, I have grouped these changes in my report under that issue, although they are set out sequentially in the appendices.

#### *Main Issues*

10. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified nine main issues upon which the soundness of the plan depends.

*Issue 1 – Whether the plan's provision for housing is consistent with national policy and in general conformity with the London Plan in terms of the overall number of dwellings; deliverability, the allowance for windfall development and accommodation for gypsies and travellers.*

#### *Housing targets*

11. The London Plan (consolidated with alterations) published in February 2008, sets the borough an annualised housing target of 370 additional dwellings per year for the period up to 2016/17, based on a Housing Capacity Study published in 2004. Merton's housing target is reduced to 320 units per annum in the draft replacement London Plan for the period 2011-2021. This revised target is based on the 2009 London Strategic Housing Land Availability Assessment (SHLAA).
12. As the emerging housing supply target is derived from more up-to-date and robust evidence than the published plan, I agree that it is appropriate to use the draft housing target figure in the CS and to roll this forward to cover the 15 year plan period.
13. Merton's 40% affordable housing target is supported by evidence that it strikes an appropriate balance between the borough's housing needs and the opposing tension of scheme viability, and it is supported by an Affordable Housing Economic Viability Study (2010). As the London Plan affordable housing target is likely to be framed as an aspiration across the capital as a whole, I am satisfied that the CS will be in general conformity with the London Plan.

#### *Supply of housing sites*

14. PPS 3 *Housing* (PPS 3) requires local planning authorities to identify broad locations and specific sites which will enable the continuous delivery of housing for at least 15 years, including sufficient specific deliverable sites for the first five years. Although the housing trajectory in the CS specifies the number of units projected to be delivered over the plan period, there was limited evidence underpinning these figures when the examination opened.
15. The Council's Housing Delivery Background Paper<sup>1</sup> produced for the hearings identifies specific sites sufficient to deliver (and indeed, exceed) the housing target for the first five years of the plan period. All the sites have been granted planning permission and around half the units are on sites currently under construction. Most of the remaining sites have valid planning permission and will be implemented by 2016, based on contact with developers, applicants and agents. The remaining 8% of units are accounted for by other proposals where permission is pending the completion of legal agreements, outline approvals and resubmissions following withdrawn schemes.
16. The Housing Delivery Background Paper sets out the evidential basis for housing trajectory figures for years 6-10 and 10-15 (plan periods 2 and 3). These include sites currently under construction where completion is expected after 2016, sites with extant permissions and other known sites, including twelve sites identified in the borough's Unitary Development Plan (UDP) which, although yet to be implemented, have been subject to detailed appraisal and planning briefs. The regeneration of Morden (MoreMorden) and the redevelopment of Wimbledon Station Precinct are identified as key sources of housing in the latter part of the plan period. Nevertheless, the housing trajectory relies heavily on windfall development after the first 5 years. PPS 3 states that allowances for windfalls should not be included in the first 10 years of land supply unless there is robust evidence of genuine local circumstances that prevent specific sites being identified. It is to these local circumstances that I now turn.

#### *Windfall development*

17. Merton is characterised by small scale development and a tight-knit mix of uses, dominated by residential development, interspersed by tracts of open space. As few brownfield sites are currently identified as likely to come forward for residential development during years 10-15 of the plan period, the emphasis is on recycling existing small sites. These local circumstances are reflected in the fact that there are no housing sites of sufficient significance in themselves to be considered key to the delivery of the strategy overall and very few sites identified as key to delivering housing in the borough's sub-areas.
18. Historically, Merton's housing provision has been largely reliant on small schemes, the majority of which have been on unidentified sites. Some 59% of housing units completed between 2000 and 2009 were provided on such windfall sites. Windfall housing sites derive from the conversion of non-residential buildings; the subdivision of existing housing stock to increase capacity, both with and without physical extensions, and small infill schemes of less than 10 units. Historically, less than 10% of applications comprised

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<sup>1</sup> Housing Background Paper January 2011 *Appendix 1 Housing Trajectory Sites 2011-2016*

schemes of more than 10 units. Almost 95% of schemes completed between 2000 and 2009 were for schemes of one or two units.

19. The Council has looked closely at windfall development on residential garden land following the change to the PPS 3 definition of previously-developed land in June 2010. However, very few new residential units have been permitted entirely on garden land – a much smaller component of windfall sites than expected. Consequently, it is unlikely that this change will impact on future windfall rates. No other circumstances have been identified which might prevent the historic rate of windfall development continuing. The housing trajectory therefore applies a windfall allowance based on the borough's historic windfall rate to the projected capacity identified in plan periods 2 and 3.
20. Density/capacity assumptions underpinning the windfall allowance have been informed by characterisation studies of the borough's sub-areas, supplementary planning guidance (SPD) on design and conservation area appraisals. The Council's policy on residential conversions has also been taken into account in the modelling, as has the high proportion of family-sized (3 bedrooms or more) dwellings in the borough and the need for smaller units.
21. The 2009 London SHLAA acknowledges the unique circumstances of London concerning the substantial reliance on windfall sites, and these circumstances apply equally to Merton for the reasons identified. Taking all these matters into account, there are genuine local circumstances which prevent specific sites being identified to deliver sufficient housing to meet targets in years 6-10, and the allowance for windfalls is realistic having regard to the London SHLAA, historic windfall rates and expected future trends.

#### *Gypsy and traveller accommodation*

22. Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites* requires DPDs to translate into specific site allocations the number of pitches indicated as being required to meet accommodation needs identified for each local authority area in the Gypsy and Traveller Accommodation Assessment (GTAA) carried out at regional level. When the London Plan was published in 2008, a study was in progress to assess Gypsy and Traveller accommodation needs, and the outcome of this study<sup>2</sup> fed into the Draft Replacement London Plan published in October 2009. This identified a need for 9 additional pitches in Merton at that time.
23. In March 2010, the Mayor published a minor alteration to the consultation draft of the Replacement London Plan relating to gypsies and travellers. This revised the need for accommodation in Merton downwards from 9 to 4 additional pitches. The justification for Policy CS 10 refers to this level of requirement, although it is not incorporated in the policy itself.
24. The robustness and accuracy of the methodology used in the London GTAA was questioned by the Mayor who published further minor alterations to the draft replacement London Plan for consultation in September/October 2010. This alteration signalled the Mayor's view that boroughs are best placed to assess

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<sup>2</sup> London Boroughs Gypsy and Traveller Needs Assessment. Fordham Research. London Councils/GLA 2008

the needs of, and make provision for, Gypsy and Traveller accommodation, reflecting local need and historic demand.

25. Given the uncertainty around the emerging London Plan context, the Council has decided to carry out its own GTAA based on information in the Fordham Research, local intelligence provided by those working with the Gypsy and Traveller community, direct engagement with the Gypsy and Traveller community and consultation with other boroughs in order to assess local need. Merton's GTAA will take into account any targets for pitches specified when the replacement London Plan is published. If no such targets are specified, the level of local need will be based on the borough's own GTAA and sites will be identified and allocated using the criteria set out in Policy CS 10.
26. Additional pitches to meet the identified need will be delivered through the Local Development Framework (Site Allocations or Area Action Plan DPD) and/or the management of the Council's own land/property assets and any approved proposals for private pitches which come forward on unallocated land.
27. The Council's proposed changes **PC10, PC11, PC12** and **PC13** reflect the new way forward outlined above. They represent a pragmatic approach to addressing Gypsy and Traveller accommodation needs at a time of significant and ongoing changes in the regional and national policy context. Bearing in mind the importance of delivery, the above changes necessary to make the plan sound.

*Issue 2 – Is there robust and credible evidence of local circumstances of sufficient weight to justify the plan's qualified support for educational development on open space, in conflict with national advice and the thrust of the London Plan?*

28. PPS 17 *Planning for open space, sport and recreation* advises that open space, sports and recreation facilities should not be built on unless an assessment has been undertaken which clearly shows the open space, or buildings and land is surplus to requirements. In London, designated Metropolitan Open Land (MOL) is given the same level of protection as Green Belt; there is a presumption against inappropriate development, except in very special circumstances. Much of the open space in Merton is designated MOL.
29. The thrust of national and London Plan policy is carried forward in the CS. Policy CS 13 seeks to protect and enhance the borough's public and private open space network, including MOL, parks and other spaces. However, it allows educational establishments to be developed on any type of open space where locally justified, subject to criteria relating to need; alternative sites and the sequential test; protection of nature conservation interests, and a requirement that the site reverts to open space should the education provision cease.
30. The justification for this exceptional approach refers to pressure for schools in the borough, whilst noting that a number of existing schools are located within designated open space and that some areas of the borough have more open space than the London average. Paragraphs 19.10–19.14 of Chapter 19 *Infrastructure* put more flesh on the bones of educational needs.

#### *Anticipated education demands*

31. The Council has a statutory duty under the Education Act to provide access to a primary school place for all residents who want one. It must plan for school



expansion to meet anticipated needs, where necessary identifying sites suitable for new schools. After a modest fall in demand for reception places in the years up to 2005/6, the borough experienced an unprecedented increase in demand for primary school places fuelled by an accelerating increase in birth rate. Based on live birth data up to 2008, the evidence<sup>3</sup> indicates that demand will continue to increase rapidly, resulting in a requirement for an additional 12 form entry (FE) places across the borough by 2012/13.

32. Projections beyond 2012/13 are less robust as they are not based on live births. Based on population projections and the historic relationship between the school-age population and the demand for school places, in January 2010, the Greater London Authority (GLA) forecast that after peaking at 2640 in 2013, pupil numbers would fall off in later years, reducing to 2460 in 2018/19<sup>4</sup>. However, demand for places continued at the "high" scenario forecast level, and a report in October 2010 noted that more recent demographic information suggested that demand would increase further in 2013/14 and 2014/15, rather than plateau and then fall as forecast previously. However, the report does not indicate the scale of increase from 2013 onwards, specify anticipated pupil numbers or look beyond 2015 when demand was expected to continue falling under the earlier forecast.

#### *Meeting demand*

33. At the start of 2010, the Council's funded school place strategy comprised a number of permanent school expansions, the site purchase and building of a new primary school to serve north Wimbledon and a number of temporary classrooms. This strategy was reviewed in October 2010 in the light of demand continuing to be at a "high" forecast level, further increased demand being projected in the period up to 2014/15, and the difficult financial context faced by the Council. In December 2010 (after the CS was submitted for examination) the Council resolved to focus on the expansion of existing schools rather than create a new school in north Wimbledon, given the time required to find a site and construct the school and the lack of available funding.
34. It is anticipated that, in the short term, additional pupil numbers can be accommodated through the expansion of existing schools. Merton's school expansion programme 2011/12-2013/14 involves some restricted use of physically adjoining or functionally linked open space by school children, for example using part of a nearby park as a play area during school hours, term time only. In the case of the proposed expansion of Dundonald Primary School Wimbledon there may be a very minor loss of open space (about 0.21% of the total park space). This would be compensated for by the creation of more functionally usable public space, reconfiguration of the playground, multi use games area and bowling green.
35. The Council is concerned that if the demand for primary school places continues to rise beyond 2014 and the expansions carried out under the current programme cannot meet all the statutory need, the creation of more primary

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<sup>3</sup> London Borough of Merton Primary School expansion programme – update 21 January 2010

<sup>4</sup> Committee/Cabinet Report on Primary School Places 22 February 2010 Table 1

school places would have to be considered. In this event, the Council would probably review the scope for further expansion at existing primary schools, and may undertake another search for a site suitable for a new school. This may mean extending existing schools, or building a new school, on open space.

#### *Alternative sites*

36. There was considerable discussion at the hearing about whether there are the local circumstances which justify qualified support for educational development on open space. The Council's hearing statement refers to a 2009 cabinet report which sets out options to deal with the increase in demand for primary school places. Based on this report, the hearing statement says "It was determined that there are no reasonable alternative sites for new schools in the borough".
37. When pressed at the hearing, the Council stated that it was not able to publish details of the site search for reasons of confidentiality. However, it explained the methodology used in the site assessment – a sequential approach which began by looking at the potential for existing schools to expand on previously-developed land, followed by a review of Council-owned non-residential, brownfield sites, then brownfield sites not owned by the Council and, finally, open space. This process did not reveal any sites on previously-developed land suitable for schools, underpinning the Council's view that there are no reasonable alternative sites for new schools, other than on open space.
38. Since it appears to be a key document in support of the Council's approach, I have looked very carefully at the Primary School Places Strategy report to the Council's cabinet on 14 December 2009 (MD5.62) and the supplement with revised recommendations (MD5.63) which were referred to by the Council.
39. Paragraphs 2.11-2.12 of the main report state "*officers have considered the site constraints of all schools, and commissioned a report from estates surveyors on the viability of purchasing a site for a school in areas where existing school sites make further school expansion prohibitive. The work has demonstrated that in the area of Wimbledon/north Wimbledon there are **very limited options for school expansion** due to schools being in constrained sites, often already expanded under the two tier reorganisation project in the early 2000s. The confidential background report demonstrates that there **are options to purchase a school site in a key area**, though the purchase has some risk and may require the use of the Council's compulsory purchase powers*" (my emphasis).
40. Under the heading Alternative Options, the report states "**Numerous options have been considered with an independent consultant in developing the strategy. These include use of existing council/other public sector buildings, an Academy for primary aged children, utilising open space, construction processes and procurement, and review of school assets, all of which will be progressed further as the strategy develops....**The alternative option of pursuing a new school is detailed in the paper but cannot be a commitment at this stage due to lack of finance" (again, my emphasis)
41. Nowhere in the report can I find any reference to there being "no reasonable alternative sites for new schools in the borough". On the face of it, what is written in the report appears to undermine the Council's justification for lending qualified support for education development on open space. It may be that the

options to purchase a school site highlighted above involve land which is currently open space, however, this is not clear from the report. What is clear from the report is that alternative options for education provision were still being pursued at that time, including options which do not involve open space.

42. I accept that for reasons of confidentiality, the Council may be prevented from providing details of the specific sites considered for educational development when assessing options to meet anticipated future demand. However, the December 2009 reports I have been referred to by the Council do not provide robust evidence sufficient to justify a policy which is so clearly in conflict with national policy and the London Plan.

#### *The Government's approach to schools development*

43. In July 2010 the Secretary of State outlined the importance of establishing new free schools. The consultation paper "Planning for schools development" proposed changes to legislation aimed at freeing up the planning system in relation to schools development, and sought views on expanding permitted development rights to allow buildings in a variety of uses to be converted to schools without the need for planning permission. The outcome of this consultation has yet to be published, but the direction of travel is clear.

#### *Summary*

44. I acknowledge the Council's statutory duty to provide primary school places. Although plans are in place to meet short term need, I appreciate the Council's concerns that demand may continue to rise contrary to earlier forecasts that it will fall off towards the end of this decade. However, I am mindful that long term projections are less robust than those based on live births, and this creates uncertainty about the level of demand when planning for the longer term. Factors outside the Council's control make it difficult to forecast where future demand will arise in the borough. Alongside the nationally recognised limit of 2 miles walk-to-school distance for pupils under 8 years old, this has implications for areas of search within the borough when identifying potential sites for new schools. All these factors make planning ahead for schools provision over the lifetime of the CS very challenging.

45. I have not seen compelling evidence that the need for education provision beyond 2013 will necessarily require educational development on open space. Whatever form the Government's proposal to remove planning barriers for schools finally takes, the likely outcome is that it will be easier to convert existing buildings to school use without needing planning permission. Education provision which becomes available as a result is likely to reduce future pressure to expand existing schools or build new schools on open space in the event that demand continues to rise after 2013.

46. Taking all these matters into account, I am not convinced that there is robust and credible evidence of local circumstances of sufficient weight to justify the plan's qualified support for educational development on open space, against the thrust of national policy and the London Plan. I therefore find that part of Policy CS 13 which gives qualified support for educational establishments on open space to be unsound and have recommended the deletion of Policy CS 13 (i) and the related paragraph in the supporting text under changes **IC10** and **IC11**. The knock-on effects to various paragraphs in the chapters on

Infrastructure, Monitoring, Delivery and Implementation are set out in changes **IC8, IC9, IC12** and **IC15**.

47. Change **IC8** highlights that the expansion programme for the period 2011-2013 will meet demand for primary school places on previously-developed land. However, there may be a need for more spaces beyond 2014 which could trigger further assessment of the potential to expand on existing school sites and/or a search for a new school site. It may be necessary to re-visit Policy CS 13 in the event that the level or location of identified demand can only be met by building on a particular area, or areas, of open space.
48. The Council's proposed change about the health benefits relating to school provision (agreed with the Primary Care Trust in a Statement of Common Ground) has been relocated from deleted paragraph 21.20 to the end of paragraph 19.19, where it follows on from other benefits associated with education initiatives (change **IC9**). Change **IC12** deletes the reference to monitoring the loss of open space arising from education development in the section on monitoring and delivery in Chapter 21. Change **IC15** amends paragraph 28.9 to reflect the possibility that Policy CS13 may need to be re-visited if in the future demand for school places cannot be met on brownfield land.
49. In reaching a view on this issue, I have taken into account the Council's willingness to amend the wording of the policy and supporting text to add clarity to policy interpretation and reinforce that this approach is only proposed because of exceptional circumstances and would be subject to stringent criteria. While these amendments go some way towards addressing detailed concerns, they do not address the fundamental soundness issue.
50. Given the impact that the Government's proposed change to the planning system is likely to have on school provision in the near future, I am sure that the Council will monitor not only changes in demand for school places over the next three years, but also the supply of pupil places, whatever the source. As future projections firm up, it will become clear from careful monitoring whether any further primary school place provision will be required to increase capacity beyond that designed to cater for the peak in demand currently anticipated.
51. At the hearings and in written representations, there was evidence of a groundswell of local concern about the lack of publicly available information to support the Council's statement on the lack of alternative sites. As part of the monitoring process, I hope the Council will put in place transparent measures to identify where any anticipated unmet demand in the borough might be met, such that the method and outcome of any search for sites and/or schools with potential for expansion is in the public domain as far as possible.
52. If further expansion or a new school is required to meet demand from 2014/2015 onwards, the Council will then be well placed to identify where and how this will best be accommodated, and the community will have been actively engaged in the process. In the event that this provision can only be accommodated on open space, it may be necessary to look again at Policy CS 13. However, the policy as drafted (or as proposed to be changed by the Council) is not justified based on the evidence submitted.

*Issue 3 – Is the plan consistent with national policy and in general conformity with the London Plan in terms of how it approaches planning for centres in general and having particular regard to the proposal to designate Colliers Wood as a District Centre, the threshold specified for retail impact assessments, and the assessment of town centre type uses outside town or local centres?*

### *Planning for Centres*

53. In accordance with Planning Policy Statement 4 *Planning for Sustainable Economic Growth* (PPS 4) Policy CS 7 sets out the hierarchy of centres in the borough. Within the policy, Table 17.1 defines the LDF designations of Major Centres, District Centres and Local Centres and sets out which of Merton's centres falls within each designation. Table 17.2 in the supporting text summarises the aims for all of the named centres under various headings.
54. As originally drafted, Table 17.1 included "Neighbourhood Parades" within the hierarchy of town centres. The Council originally felt that the inclusion of "Neighbourhood Parades" is inconsistent with national policy and proposed changes to Table 17.1 in the policy (**PC4**), to Table 17.2 (**PC5**) and paragraph 17.14 in the supporting text (**PC8**) to delete all references to neighbourhood parades in the CS chapter on Centres. Having reconsidered the matter the Council wishes to reinstate references to neighbourhood parades in Policy CS7 and in the glossary of definitions. The justification for the reinstatement, which I agree with, is provided by policies 2.67 and 4.8 of the consolidated draft Replacement London Plan.
55. The town centre aims set out in Table 17.2 cover a variety of uses: business and employment; retail; residential; arts, culture and the evening economy and development serving tourists and visitors. However, there is no mention of the wide range of other uses which provide consumer choice and promote competitive town centres, such as food and drink, banks, building societies, healthcare facilities, places of worship and such like. This shortcoming is remedied by the Council's proposed change **PC7** which inserts an additional row into Table 17.2 to address such uses and how they fit into the aims for different types of centre within the borough. This change is necessary to make the plan consistent with national advice.
56. PPS 4 also highlights the importance of conserving and where appropriate enhancing the established character and diversity of town centres. The Council's proposed change **PC6** clarifies the Council's aims for Wimbledon town centre in this respect, by reference to public realm improvements to promote connectivity within the centre. Given the importance of Wimbledon town centre in the borough hierarchy (the only Major Centre in Merton) the clarification provided by this change is necessary to make the plan sound.

### *Colliers Wood*

57. Annex 1 to the published London Plan (Annex 2 in the draft Replacement London Plan) sets out London's town centre network. The town centres in each borough are listed in a table, classified by type and broad future direction, among other things. Colliers Wood is not classified as a town centre in either the published or emerging London Plan. At face value therefore, the Council's desire to re-designate Colliers Wood as a District Centre appears to be at odds with the London Plan.

58. However, it is clear from the evidence<sup>5</sup> that Colliers Wood is currently operating at District Centre level in terms of retail floorspace. The reason it has not been classified as a town centre in the London Plan is due to the fragmented nature of the area. The GLA considers that an implementation strategy needs to be put in place to transform Colliers Wood into a coherent centre before it can be designated a District Centre. This approach is reflected in Policy CS1, which requires a masterplan to manage development to be adopted before Colliers Wood is designated a District Centre in the London Plan hierarchy.
59. In pursuit of this objective, the Council will engage with the GLA, Environment Agency, Transport for London (TfL) and major land owners to develop a comprehensive approach to flood mitigation measures, identify infrastructure requirements, ascertain what is physically possible and consider how this can help create a more attractive and cohesive environment and improve pedestrian movements, including those between the High Street and the retail parks to the south and between the various retail parks themselves. As A2 uses (banks, estate agents etc) are underrepresented in Colliers Wood at present, the plan-led approach would aim to encourage such uses to provide a better geographic mix of uses overall.
60. Scenario testing carried out as part of the Retail and Town Centre Capacity Study 2011 indicates that the long term level of growth likely to occur at Colliers Wood would have minimal impact on retail, services and facilities in existing town centres. Morden and Mitcham are based on centres which have very different roles to that of Colliers Wood – neither holds the same type or volume of retailing as Colliers Wood. However, Colliers Wood is starting to compete with Wimbledon with the range of comparison goods on offer. This has prompted the Council to highlight the timescale envisaged for the growth of comparison retail in Wimbledon (**PC5**), a change which is endorsed in the interest of clarity on the timescale of delivery. The aim of the plan-led approach is to help create a unique identity for both Colliers Wood and Wimbledon to enable both centres to thrive.
61. The plan-led approach is the appropriate way forward to manage development in Colliers Wood, implement a strategy to produce a cohesive town centre and secure a comprehensive approach to flood mitigation. This should pave the way for future inclusion in the London hierarchy of town centres. As the CS does not seek to designate Colliers Wood as a District Centre until such a plan is in place (and presumably supported by the GLA) the CS approach is in general conformity with the London Plan.

#### *Retail impact assessments*

62. PPS 4 supports setting local floorspace thresholds for the scale of development which should be subject to an impact assessment and specifying the geographic areas where these thresholds will apply. Merton CS has set a threshold of 280m<sup>2</sup> for retail proposals outside town centres and Local Centres, and for any development which the Council considers would have a significant impact on

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<sup>5</sup> GLA Town Centre Health Checks (2009); Merton's Retail and Town Centre Capacity Study (2011); Merton's Retail Capacity Studies (2005 and 2008 update) Wimbledon Town Centre Competitiveness Study 2007; Annual Monitoring Reports (2004-2010)

existing centres in the borough. This floorspace threshold is significantly below the existing threshold in the adopted UDP.

63. The CS supporting text identifies the Sunday Trading Act as the source of this threshold but does not explain why it is considered appropriate to use this particular threshold in Merton. The Council's proposed change to the supporting text would clarify why it has chosen to adopt this approach. Whilst endorsing the general thrust of the change in the interest of clarity, it does not go far enough.
64. The Sunday Trading Act defines a large shop as a "shop which has a relevant floor area exceeding 280 square metres" and relevant floor area as "the internal floor area of so much of the shop as consists of, or is comprised in a building, but excluding any part of a shop which, throughout the week ending with the Sunday in question, is used neither for the serving of customers in connection with the sale of goods, nor for the display of goods". However, the supporting text in the CS refers to retail proposals above 280m<sup>2</sup> without indicating whether this is a gross figure, a net figure or "relevant floor area" as defined in the act. It then uses the term "floorspace capacity" of 280m<sup>2</sup> without clarifying what constitutes capacity in the context of the Sunday Trading Act.
65. In the interest of consistency within the text and the definition of "large shop" in the Sunday Trading Act, it is necessary to address these points and amend change **PC8** to make the plan sound. Alternatively the Council (if it prefers) could move the definition of "relevant floor area" to the Glossary of Terms in section 32 of the CS, and signal the whereabouts of the definition in the text of paragraph 17.4.

#### *Town centre type uses outside town or Local Centres*

66. Whilst the general thrust of Policy CS 7 in relation to town centre type uses outside town or Local Centres is consistent with PPS 4, the wording of element (b) is not. As none of the Council's proposed changes address this issue (which was raised by a representor in a letter presented to the hearing) I have dealt with this matter by change **IC7** which inserts the word "significant" before "adverse impact" so that the CS policy aligns with national policy. This change is necessary to make the plan sound.

#### *Issue 4 - Is the designation of Locally Significant Industrial Sites and the restrictions on the uses acceptable in such areas justified by robust evidence?*

##### *Evidence underpinning LSIS*

67. In common with all south London boroughs, Merton has low levels of industrial land relative to demand and has adopted a restrictive approach to the transfer of designated industrial sites - Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) - to non-employment uses. To ensure an adequate supply of viable and appropriate sites and premises for employment use in accessible locations, Policy CS 12 protects these designated sites so that they contribute towards business, industrial, storage and distribution functions. Support for some market specialisation of business and industrial functions (use classes B1b, B2, B8) is provided in the supporting text.

68. In 2010, a study<sup>6</sup> estimated future requirements for both B and non-B class uses and compared these with identified and committed employment space to assess any additional land needs. Based on this assessment, sufficient industrial land exists to meet future needs and a surplus of industrial land could arise from continued decline in manufacturing uses. However, the study highlighted that the potential surplus of industrial land may be negated by requirements of non-B class uses such as education and waste management which could potentially locate on industrial land. Depending on waste management needs, such requirements could exceed the amount of surplus industrial land emerging over the next 15 years.
69. The study recommends a very cautious approach to the release of employment sites in Merton to non-B class uses due to the difficulty of finding new sites suitable for the type of uses specified in Policy CS 12. By their nature, most of these activities are incompatible with sensitive uses such as housing. Other locational requirements add further constraints when identifying suitable new sites. Mixed use developments on the other hand, have a wider choice of locations across the borough. Allowing mixed use schemes which include a residential element (or other sensitive use) in designated SILs and LSISs would be likely to create tensions between incompatible uses and impact on the operation and viability of businesses. In line with the thrust of PPS 4, Merton directs (B1a) office development to town centres. Taking all these matters into account, the designation of LSISs and the restrictions on uses in such areas are generally justified.

*Site specific considerations*

70. As part of the 2010 study, the quality/condition of all designated employment sites was assessed according to specified criteria, including strategic and local access; proximity to urban areas, labour and services; site characteristics and constraints; proximity to sensitive uses; market attractiveness; sequential status; barriers to delivery and planning factors, such as policy constraints which could affect development of the site for employment purposes. None of the 16 designated sites were considered unsuitable for continued use. Only 4 out of the sample of 113 scattered sites were considered candidates for release to other uses such as housing, on the basis that they are unoccupied and have strong constraints on new employment development or re-occupation by employment generating uses.
71. However, in the course of the hearings, the Council acknowledged that there were site specific circumstances relating to two designated LSISs which may justify widening the range of uses considered acceptable on these particular sites, provided they continue to deliver the employment objectives enshrined in Policy CS 12. Unlike other designated employment sites in the borough, both the Rainbow Industrial Estate and the Gap Road Industrial Area are located close to designated centres at Raynes Park and Wimbledon respectively. In addition, both sites have difficult accesses, and awkward linear shapes bounded by the railway line and residential areas.

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<sup>6</sup> Merton's Economic and Employment Land Study (2010)



72. In the case of the Rainbow Estate, the owner's aspiration is to regenerate the site through wholesale redevelopment to provide small unit accommodation for rent on flexible terms, mainly to small and medium enterprises (SMEs), the need for which is acknowledged in the 2010 study. Redevelopment will bring with it opportunities to improve access, make more efficient use of the site and improve the way the site functions. However, business floorspace for SMEs generates relatively low rents/returns and it is becoming increasingly necessary to secure cross-subsidy from higher value uses. I share the Council's view that a wider range of uses than those currently allowed in LSISs, as set out in change **PC16**, could assist the regeneration of this site, and bring with it the benefits highlighted above.
73. In the 2010 study, the Gap Road Industrial Area has the lowest quality/condition score of all LSISs. Some of the buildings are dated and access is poor. The owners' view is that redevelopment of the site as a whole would be the best solution on the grounds of highway safety. However, the site is heavily constrained by surrounding uses and restrictive policy designations: residential gardens in the Leopold Road Conservation Area to the east, a protected treed green corridor between the site and the railway line to the west and a Site of Importance for Nature Conservation (SINC) in the south west corner of the site.
74. The redevelopment of the Gap Road Industrial Area would need to positively address the constraints identified above. However, support for a wider range of uses on this site as suggested by the Council in change **PC16** would open up possibilities which are not an option at present and broaden the opportunities for an imaginative solution. In the light of the suggested change, I am not persuaded that the site is no longer suitable for employment use or that removing the LSIS designation for this site, as requested, is justified. I have taken the additional representation based on the Planning for Growth announcement into account in reaching this view.
75. Representors for both sites welcome the Council's recognition of the exceptional circumstances in respect of the Rainbow Estate and the Gap Road Industrial Area, but would prefer these exceptional circumstances to be acknowledged in the Policy, rather than in the text (change **PC16**) and Delivery and Monitoring section of the Economic Development chapter (change **PC17**). Given the importance of maintaining employment uses on these sites which might not be delivered without support a wider range of uses as part of an employment-lead redevelopment, changes **PC16** and **PC17** necessary to make the plan sound. However, it is not appropriate to refer to particular site-specific circumstances in a strategic policy which covers the whole borough.
76. Arising from the public consultation on these proposed changes, I received representations seeking to add the Bushey Road Industrial Area to the exceptional sites identified in changes **PC16** and **PC17**. However, whilst this site is near housing and a school, it is not located in close proximity to a designated town centre. In this respect, it does not share the same characteristics as the Rainbow Estate and the Gap Road Industrial Area. Although called "industrial areas", acceptable uses in LSISs under Policy CS12 include B1b and B1c business uses which by their nature can operate in residential areas without harming amenity. Therefore there is no need to add Bushey Road to the list of exceptional sites based on its proximity to housing. I agree with the Council that other arguments in the representation that there is a compelling case to support a wider range of uses at Bushey Road, or that an

employment-led mixed use redevelopment is justified as the only way to secure the site for employment purposes in the future, are not persuasive.

77. To treat Bushy Road as an exceptional case in these circumstances would make it difficult to resist similar requests from other LSISs, most of which are located within wider residential areas, or adjacent to housing. The impact of allowing a wider range of uses in more LSISs, either on a cumulative basis or by amending Policy CS 12 so as to generally allow a wider range of uses in such areas, would devalue the LSIS designation, undermine their continued contribution towards business, industrial, storage and distribution functions, and thereby unacceptably dilute one of the key planks of Policy CS 12. In reaching this view I have taken into account the need for flexibility promoted in the Planning for Growth announcement. I agree with the Council that the Plan contains an appropriate level of flexibility by promoting employment-led regeneration at the Rainbow Industrial Estate and Gap Road.

*Issue 5 – What are the local circumstances that warrant and allow the sustainable building requirements set out in Policy CS 15 to be brought forward in Merton in advance of national requirements; has the effect of these requirements on development viability been assessed and is the plan sufficiently flexible?*

78. The borough has a justified reputation for being a leader in the field of policies to address climate change. Merton was the first local planning authority to introduce prescriptive renewable energy targets for new developments at a time when there were no energy efficiency backstops in the Building Regulations. The Council's approach has now changed with the emphasis on energy efficiency, rather than renewable energy targets. However, Merton still aims to take the lead in tackling climate change. This is manifest in Policy CS 15 *Climate Change* which requires all new dwellings to achieve Code for Sustainable Homes Level 4 in advance of certain elements of the Code being embedded in the Building Regulations.

79. Paragraph 31 of the Planning and Climate Change Supplement to PPS 1 acknowledges that there may be situations where it could be appropriate for planning authorities to anticipate levels of building sustainability in advance of those set nationally, where local circumstances warrant and allow this. It is to these local circumstances that I now turn.

80. Merton is a relatively dense urban borough where some 60-65% of carbon dioxide emissions are generated from the building stock. As noted already, Merton is characterised by small scale built development, predominantly residential in nature. The relative lack of large sites in the borough limits the opportunity for significant use of decentralised and renewable or low-carbon energy. Where such opportunities exist, the Council actively pursues the use of decentralised energy. For example, it has looked at options for establishing a district energy network using Council-owned buildings in Morden town centre as an energy centre nucleus. However such opportunities are relatively few and far between.

81. In order to tackle climate change and to develop a low carbon economy, the Council has therefore concentrated on measures which would have the greatest impact in the borough by maximising the potential for reducing emissions from existing buildings. In doing so, it has focussed on the borough's key built resource, the domestic housing stock.

82. A carbon assessment of existing dwellings in Merton submitted as part of the evidence base<sup>7</sup> investigated housing stock by building type, modelled expected emissions and used this to examine potential emissions savings measures and estimated pay-back periods. Although there is no nationally recognised sustainable design and construction standard for the refurbishment of domestic dwellings, the Building Research Establishment (BRE) is currently developing such a standard. Change **PC19** flags up the Council's intention to introduce a minimum standard for domestic refurbishment once the BRE standard has been launched. An appropriate level of the scheme will be identified for the borough, informed by evidence underpinning the CS.
83. In terms of new housing stock, the Code for Sustainable Homes Level 4 standard is already mandatory for grant funded affordable housing. In order to drive up standards of sustainable design and construction in the borough, the CS requires all new homes to conform to this standard. This broad approach is not in accordance with the guidance in PPS1 and it is unusual for such an approach to be acceptable. However I am mindful of Merton's pioneering work in this field. In addition and of much greater importance, is the detailed local viability evidence that shows that Code level 4 is achievable in almost all circumstances and locations across the borough<sup>8</sup>.
84. Policy CS 15 f also sets targets for non-domestic buildings based on the BRE Environmental Assessment Method (BREEAM) Very Good standard and the emerging London Plan emissions reductions targets. However, until recently there has been no simple methodology to read across between the London Plan targets and the CO<sub>2</sub> intensity index used to calculate BREEAM levels. One of the changes put forward by the Council when the CS was submitted proposed an alternative measurement of carbon reduction based on the BREEAM Very Good and Excellent standards, rather than the London Plan target.
85. Shortly before the CS hearings opened, the BRE published an open letter<sup>9</sup> setting out changes to the BREEAM which, in summary, mean that in future the BRE will be including the same carbon measurements as used in the London Plan, thereby allowing direct comparison and facilitating monitoring. As a result, the Council no longer considers that any changes are necessary to the text of Policy CS 15 f in relation to targets for non-domestic buildings. To avoid confusion, I have deleted the change to this policy proposed in November 2010 such that the original text is retained, in accordance with the Council's wishes.
86. The evidence shows that the BREEAM standard target for non-domestic buildings selected for the CS is informed by regional and national research; the available literature on the costs of BREEAM; the approach to viability of sustainable design and construction methods for domestic dwellings; the potential for local renewable energy and an assessment of the level of location dependent BREEAM credits, amongst other things. Based on this evidence the chosen BREEAM standard is justified locally.

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<sup>7</sup> The Sustainable Design and Construction Evidence Base: Climate Change in the Planning System 2011

<sup>8</sup> Viability of Code for Sustainable Homes in Merton *Adams Integra* September 2009

<sup>9</sup> BRE open letter dated 1 February 2011 *BREEAM UK 2011 version*

87. Whilst setting ambitious targets, the introduction to Policy CS 15 makes it clear that evidence relating to viability will be taken into account if full compliance with standards and requirements cannot be achieved. This approach addresses concerns expressed by some representors about how the policy will be applied.
88. In conclusion, local circumstances and evidence warrant and allow the sustainable building requirements set out in Policy CS 15 to be brought forward in Merton at this stage. The effect of these requirements on development viability has been assessed and the plan is sufficiently flexible to take into account site/development specific circumstances as well as the rate at which policy and practice on climate change and energy issues is evolving. I am also mindful that the Council's approach supports the Government's ambition that all new non-domestic buildings should be carbon-zero from 2019, with the public sector leading the way from 2018.
89. As BREEAM certificates will now include carbon reduction targets that can be compared to the London Plan carbon dioxide emission targets, I agree that these should be used to monitor delivery of Policy CS 15 as proposed by the Council in change **PC21**. Since monitoring underpins the effectiveness of the CS, this change is needed to make the plan sound.
90. At the hearing, the Council made clear its intention to continue to drive up standards in sustainable design and construction of non-domestic buildings, as and when evidence indicates that this would be viable. It also clarified the local authority's expectation that all measures to reduce on-site carbon emission will be exhausted before off-site solutions are considered. These matters have been incorporated into proposed change **PC20**. As this change signals how the Council intends to continue delivering the strategic objective to take the lead in tackling climate change and develop a low carbon economy whilst ensuring that development remains viable, it is necessary to make the plan sound.

*Issue 6 – Is it clear how the plan will deliver strategies for active transport, sustainable waste management and measures to mitigate flood risk and are the roles of subsequent DPDs in delivering these and other strategies clearly signposted?*

91. I deal with general issues relating to infrastructure delivery under Issue 8. However, there are some policies in the CS where the main vehicle for delivery will be a different DPD or a related plan, and/or where the policy will be developed further in a Supplementary Planning Document (SPD) or similar document. Although these documents clarify how particular parts of the strategy will be delivered, by whom and when, their role and significance in delivery is not always clear or well signposted in the CS. This undermines the effectiveness of the CS and hence soundness. The Council's proposed changes to specific policies address these shortcomings. All the following changes are necessary to make the plan sound for the reason stated.

*Delivering active transport measures*

92. Changes **PC31** and **PC59** highlight the roles of TfL's Local Implementation Programme (LIP) and planning obligations in providing funding to deliver active transport measures and access improvements in the borough. It cautions that

delivery of larger transport infrastructure projects is dependent on significant funding from partners such as Department for Transport, TfL and Network Rail, and points to Table 27.2 where full details of these infrastructure projects can be found.

- 93.A related change (**PC32**) to the Transport Policies Delivery and Monitoring section reinforces this message by reference to partnership working, the Council's programme of works and the development control process as the means by which Policies CS 18-20 will be delivered.

*Delivery sustainable waste management*

- 94.Change **PC23** highlights the significance of the South London Waste Plan as the DPD where the long term vision, spatial strategy, policies and sites for the sustainable management of waste are set out, together with how the strategy and policies will be delivered and the framework for monitoring against targets.

- 95.Change **PC24** updates and confirms that the South London Waste Plan has now been subject to Sustainability Appraisal (SA). Further updates on the progress of the South London Waste Plan DPD are set out in changes **PC25, PC26, PC27, PC28** and **PC30**, whilst change **PC29** acknowledges that the EU Waste Framework Directive 2008/98 EU is one of the key drivers of sustainable waste management. Normally these updates would be minor matters. However, the changes demonstrate that one of the key elements in the delivery of the CS has moved forward significantly and steps have been taken to promote consistency and where necessary, compliance, with national (and international) policy and requirements. In these particular circumstances the proposed changes are necessary to make the plan sound.

*Delivering flood mitigation measures*

- 96.Although change **PC22** only comprises the four words, inserting the phrase "ensure the implementation of" before the words "measures to mitigate flood risk..." is key to the delivery of essential flood mitigation measures, which might otherwise be proposed but not carried out.

*The role of Site Allocations and Development Management DPDs; Conservation Area Appraisals and Management Plans and SPDs*

- 97.Changes **PC1** and **PC2** highlight the roles of the Site Allocations and Development Management DPDs in providing the detailed guidance which will take forward the vision and strategies for the borough's sub-areas. The latter also signals that the Conservation Area Appraisal and Management Plan for Mitcham Cricket Green will contribute to this guidance in the Mitcham sub-area.

- 98.Change **PC15** relates to the delivery and monitoring of Infrastructure provision. This change signposts the Council's intention to produce SPD in support of development control practice which will identify the local planning authority's requirements for different types of applications, including the requirement for Health Impact Assessments; the preparation of infrastructure in advance of development and information about planning obligations.

- 99.Change **PC18** highlights the role of the new Design SPD which the Council intends to produce to assist the implementation of Policy CS 14 *Design*. The

change indicates a range of topics to be covered in the new SPD, including various matters raised by representors as requiring clarification or guidance.

*Issue 7 – Is the CS approach to defining areas where tall buildings may be appropriate justified by robust evidence and is it clearly conveyed not only in Policy CS 14 Design, but in policies and supporting text relating to the sub-areas, in particular Wimbledon?*

*The evidence base underpinning tall buildings*

100. The Council's approach to determining areas which are appropriate, sensitive and inappropriate for tall buildings is underpinned by the Tall Buildings Background Paper. This was prepared in close consultation with English Heritage and in line with national guidance published by English Heritage and the Commission for Architecture and the Built Environment (CABE). Based on this evidence the Council concludes that most of the borough is inappropriate for tall buildings. The only areas where tall buildings may be considered appropriate are Colliers Wood, Morden and Wimbledon. However, within these identified areas there are locations considered sensitive to tall buildings.
101. Although the Council's approach to tall buildings is supported by robust evidence, the conclusions of the Tall Buildings Background Paper are not wholly reflected in Policy CS14 *Design*. The policy identifies areas where tall buildings may be appropriate and states that outside these areas, tall buildings are unlikely to be appropriate. However, it does not acknowledge that places where tall buildings may be appropriate also include areas which may be sensitive to such development. As drafted therefore, the policy is a rather blunt instrument to deliver the Council's objective. There is also an inconsistency between the wording of Policy CS14 which refers to tall buildings guidance in the sub-area "policies" and the wording of sub-area Policies CS 1 *Colliers Wood*; CS 3 *Morden* and CS 6 *Wimbledon* which do not provide such guidance.
102. The text supporting the sub-area policies draws on the Tall Buildings Background Paper to a greater or lesser extent, and the Council's proposed change **PC3** helpfully interprets the approach to tall buildings in Wimbledon town centre, which I endorse in the interest of clarity.
103. Unfortunately, the approach to tall buildings is not dealt with consistently in the Sub-Areas chapters. In some areas, the justification to the sub-area policy refers to the conclusions of the Tall Buildings Background Paper (for example, Raynes Park where the text states explicitly that tall buildings are not suitable). In other areas (such as Mitcham, a priority area for regeneration and improving the urban fabric and public realm) there is no reference to the Tall Buildings Background Paper in the justification paragraphs which deal with design issues. In addition, the Tall Buildings Background Paper is listed as a Key Driver in the Raynes Park Sub-Area, but not included as a Key Driver in any other sub-areas, including those identified as areas where tall buildings may be appropriate.
104. Unless the Council's approach to tall buildings and the detailed guidance available is highlighted comprehensively and consistently in the CS, there is a risk that it will be overlooked or ignored in those sub-areas where it is not referred to in the text supporting the policy or the Key Drivers list. Inclusion in some Sub-Area chapters but not others could be misinterpreted as an indication that the Council may respond more flexibly to tall building proposals in some parts of the borough than others, outside the areas identified as places where

tall buildings may be appropriate. By not highlighting the sensitivity of some parts of Colliers Wood, Morden and Wimbledon to tall buildings in Policy CS 14, the Council risks raising false hopes and unrealistic expectations amongst potential developers and unfounded concerns in the local community.

105. These matters could undermine the delivery of Strategic Objective 8 - a high quality urban and suburban environment where development is well designed and contributes to the function and character of the borough. To remedy this concern, inconsistencies need to be addressed and the overarching design policy fine tuned. In addition to the Council's proposed change **PC3** referred to above, the following changes are necessary to make the plan sound:

106. Changes **IC1**, **IC3**, **IC4**, **IC5** and **IC6** add broadly similar wording to the Sub-Area policies drawing attention to the guidance available in the Tall Buildings Background Paper, where this is not referred to in the original text. Changes **IC2** adds the Tall Buildings Background Paper to the list of Key Drivers in the Sub-Area chapters where absent from the original text. Change **IC13** incorporates minor changes proposed by the Council and adds a phrase highlighting that, even within areas where tall buildings may be appropriate, there are some areas which are sensitive to such development. Change **IC14** inserts a reference to the Tall Buildings Background Paper as an addition to the guidance on tall buildings outlined in the Sub-Area chapters.

*Issue 8 –Is the CS supported by evidence of the physical, social and green infrastructure needed to enable the amount of development proposed, who will deliver the infrastructure and when it will be provided?*

*Infrastructure planning and delivery, including partnership working*

107. The Council's infrastructure needs assessment identifies health facilities, transport network improvements and the provision of schools as the borough's key strategic priorities over the lifetime of the plan. Of these priorities, the delivery of schools, particularly the short term need for additional primary school provision, is the only element considered critical to the delivery. This matter has been considered in detail earlier in this report.

108. The future infrastructure needs identified in the assessment formed the basis of Table 27.2 *Infrastructure Projects* in the CS. This table sets out the cost of each project, delivery phasing, local delivery agencies and potential funding streams, amongst other things. The information in the table was accurate at the time of writing in 2008. However, over the last three years or so circumstances relating to some infrastructure projects have changed quite significantly. The Council has therefore put forward a substantially revised infrastructure table in change **PC60** (details in Appendix A: Annex 1).

109. A related change (**PC14**) to Policy CS 11b *Infrastructure* seeks to ensure that when working with partners to deliver services and facilities, development proposals will identify, plan for and, where necessary, complete infrastructure prior to occupation. Working in partnership with community groups and other interested parties to deliver the CS is likely to increase in importance over the lifetime of the plan as the localism agenda develops and matures. The Council's proposed changes **PC33**, **PC34** and **PC57** specifically acknowledge the role of such groups in delivering and implementing the CS.

110. Table 27.1 *Key Partners* identifies the delivery agency for specific policies, together with the scope of delivery and commitment to working with the Council. Proposed amendments to Table 27.1 set out in changes **PC35-PC56 inclusive** add flesh to the bones of partnership working. As these changes form an integral part of the same table, I have considered all the changes to Table 27.1 comprehensively as a group, although individually some of the proposed changes deal with minor matters. In a related change (**PC58**) the Council acknowledges the reduction in the number of public bodies likely to arise from the Public Reform Bill (May 2010) and the potential knock-on effect to the key partners which are identified in Table 27.1.

111. PPS 12 highlights that demonstrating how the vision, objectives and strategy for the area will be delivered and by whom and when, is a key soundness issue. Therefore the changes identified are all necessary to make the plan sound.

#### *Dealing with uncertainty and contingency planning*

112. Where there is uncertainty about the delivery of a project, this is reflected in the possible phasing of delivery and potential funding streams set out in revised Table 27.2. All key delivery partners are represented on the Infrastructure and Investment Board, established by the Council to provide support where there is uncertainty, or where priorities change. The Board takes the lead in identifying priorities, provides clarity in the delivery and funding of infrastructure, and determines infrastructure provision under different scenarios when contingency planning is necessary.

113. Subject to the soundness changes identified, the CS identifies the infrastructure necessary to support the level of growth envisaged in the borough during the plan period, together with the agency responsible for, and the timing of, delivery of the infrastructure projects specified.

#### *Issue 9 – Does the CS have clear arrangements for monitoring and reporting, including transparent targets, measurable outcomes and triggers for contingency planning?*

114. Although the CS refers to indicators and targets in the spatial policies, the monitoring framework in the submitted version of the DPD (Table 28.1) does not set out clear indicators and targets for all strategic objectives and policies. The level of acceptable deviation of performance against target is not specified and, as a result, the triggers for contingency plans to be activated are unclear.

115. The Council has produced a revised monitoring framework which systematically identifies indicators and borough targets for all strategic objectives and policies. Where appropriate, the revised framework also indicates the acceptable level of deviation in performance against targets over a specified period, date or baseline. Clear triggers which would activate contingency plans and/or the consideration of planning or other interventions are identified. For the most part, the nature of the contingency plan, tool for intervention and/or partner responsible for taking action are also indicated.

116. All these matters (together with some minor drafting changes) are dealt with as one change **PC61** and set out revised Table 28.1 *Monitoring Framework* which forms part of Annex 1 to Appendix A. Change **PC9** relating specifically to the delivery and monitoring of housing provision under Policy CS 9 sets out the



triggers for risk assessment and subsequent management actions in the event that housing delivery does not fall within acceptable ranges. For the reasons stated changes **PC9** and **PC61** are necessary to make the plan sound. Subject to these changes, the CS will have clear arrangements for monitoring and reporting, including transparent targets, measurable outcomes and contingency planning triggers.

## Legal Requirements

117. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Planning Strategy is identified within the LDS adopted March 2010. Although there was a slight slippage in the timing of the submission, this has been made up during the examination, such that the expected adoption date of June 2011 is feasible. On this basis, the Core Strategy's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed changes that go to soundness
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (June 2010) sets out why AA is not necessary.
National Policy and the London Plan	The Core Strategy complies with national policy except where indicated and changes are recommended. The Core Strategy generally conforms with The London Plan
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

**118. I conclude that with the changes proposed by the Council, set out in Appendix A, and the changes that I recommend, set out in Appendix C, the Merton Core Planning Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.**

*Linda Wride*

## Inspector

This report is accompanied by:

Appendix A and Annex 1 (separate documents) Council Changes that go to soundness

Appendix B and Annex 1 (separate document) Council's Minor Changes

Appendix C (attached) Changes that the Inspector considers are needed to make the plan sound

## Appendix C – Changes that the Inspector considers are needed to make the plan sound

*These changes are required in order to make the Core Strategy sound.*

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	Policy CS 1 paragraph 11.13 page 44	Guidance on tall buildings is contained in Chapter 22 Design – Policy CS 14 and in the <u>Tall Buildings Background Paper (2010)</u>
IC2	<p>Key Drivers</p> <p>Policy CS 1 Colliers Wood and South Wimbledon Sub-Area page 47</p> <p>Policy CS 2 Mitcham Sub-page 54/55</p> <p>Policy CS 3 Morden Sub-Area page 61</p> <p>Policy CS 5 Wandle Valley Sub-Area page 73/74</p> <p>Policy CS 5 Wimbledon Sub-Area page 80</p>	<p><i>Add to list of Key Drivers</i></p> <ul style="list-style-type: none"> <li>• <u>Tall Buildings Background Paper (2010)</u></li> </ul>
IC3	Policy CS 2 Mitcham Sub-Area paragraph 12.12 page 54	<p><i>Insert before last sentence</i></p> <p><u>As detailed in the Tall Buildings Background Paper (2010) and Chapter 22 Design – Policy CS 14, tall buildings are not suitable within the centre. Exclude the words “As detailed in” from the beginning of the next sentence</u></p>
IC4	Policy CS 3 Morden Sub-Area paragraph 13.12 page 60	<p><i>Add</i></p> <p><u>Further guidance on tall buildings is contained in Chapter 22 Design – Policy CS 14 and in the Tall Buildings Background Paper (2010)</u></p>
IC5	Policy CS 5 Wandle Valley Sub-Area paragraph 15.15 page 73	<p><i>Add</i></p> <p><u>Guidance on tall buildings is contained in Chapter 22 Design – Policy CS 14 and in the Tall Buildings</u></p>

		<u>Background Paper (2010)</u>
IC6	Policy CS 5 Wimbledon Sub-Area paragraph 16.14 page 78/79	<i>Add to the end of change PC3</i>  <u>Further guidance on tall buildings is contained in the Tall Buildings Background Paper (2010)</u>
IC7	Policy CS 7 b page 84	b. there is not a <u>significant</u> adverse impact on the vitality and viability of any nearby centre
IC8	Policy CS 11 Infrastructure paragraph 19.12 page 111/112	We have considered land acquisition for additional school sites and although this may be feasible in north Wimbledon this has not been the case in other parts of the borough. <u>The current expansion programme will meet demand for primary school places during the period 2011-2013 on previously-developed land. However, there may be a need for more spaces beyond 2014. This could trigger further assessment of the potential to expand on existing school sites and/or a search for a new school site. It may be necessary to re-visit Policy CS 13 in the event that the level or location of identified demand can only be met by building on a particular area, or areas, of open space.</u>
IC9	Policy CS 11 Infrastructure, paragraph 19.19	<i>Add</i> <u>In accordance with the council's health and sustainability agendas, provision of local schools will enable greater accessibility, improve opportunity for walking or cycling to school and could lead to enhancement of other local open space through planning obligations.</u>
IC10	Policy CS 13 i Education page 128	Delete element i of the policy
IC11	Policy CS 13 paragraph 21.20 page 135	Delete whole paragraph
IC12	Policy CS 13 Delivery and Monitoring Page 139	All requirements for additional educational buildings will need to be delivered through the development control process <del>and any loss of open</del>

		space will be monitored through the Annual Monitoring Report.
IC13 (with minor changes suggested by the Council)	Policy CS 14 Design paragraph c page 140/141	Tall buildings may therefore only be appropriate in the town centres of Colliers Wood, Morden and Wimbledon, where consistent with the tall buildings guidance in the <u>justification supporting sub-area policies, where of exceptional design and architectural quality, where they do not cause harm to the townscape and significance of heritage assets and the wider where justified in terms of their impact on the townscape and historic environment, and where they will bring benefits towards regeneration and the public realm. Even within the identified centres, some areas are sensitive to tall buildings.</u>
IC14	Policy CS 14 Design paragraph 22.21 page 148	More specific guidance on tall buildings is outlined in Chapter 11 Colliers Wood and South Wimbledon Sub-Area Policy <u>CS 1</u> , Chapter 13 Morden Sub-Area Policy <u>CS 3</u> , Chapter 16 Wimbledon Sub-Area Policy <u>CS 6</u> and the <u>Tall Buildings Background Paper (2010)</u>
IC15	Paragraph 28.9, page 214	<u>Policy CS13 on open space may need to be re-visited if demand for school places beyond 2014 cannot be met on previously- developed land. In identifying schools for expansion, the building on open space will need to be avoided wherever possible. However, there may be a cases Where In the event that an options appraisal demonstrates there are no options alternatives to building on open space this and it is therefore a choice will have to be made between of providing local school places for children or protecting an a particular open space or spaces.</u>

## Appendix A – Council changes that go to soundness

### Changes suggested by the Council's at submission (Document MD4.4) in its statements and at the examination hearings)

The changes below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text.

No.	Page	Policy/ Paragraph	Proposed Change
PC1	39	10.3	While the Core Strategy sets out the overarching vision and objectives for each sub-area, it will be for other plans to set out the detailed guidance to take these forward <u>where site allocations are necessary</u> , which in turn will need to be accompanied by their own delivery and monitoring framework. Vital to delivering the sub-area polices is partnership working, both across the council and with external partnerships.
PC2	55	Delivery and Monitoring 2nd para	<del>The detailed</del> <u>Details of this</u> approach will be set out in new planning frameworks including the Development Control Management DPD and a <u>specific planning document for Mitcham Cricket Green conservation area character appraisal and management plan.</u>
PC3	78-79	16.14	Wimbledon has the highest level of public transport accessibility in the borough and this makes the centre a sustainable location for major development, potentially tall buildings in accordance with Chapter 22 'Design - Policy 14'. <u>Wimbledon town centre includes clusters of existing buildings which are substantially taller than the surrounding residential area.</u> <del>New Tall</del> buildings should contribute to <u>these clusters to</u> creating a consistent scale of development based on a range of similar but not uniform building heights. These should be determined by reference to <del>surrounding</del> <u>extant</u> building heights and townscape characteristics. Regard will need to be given to the Conservation Areas and the setting of Listed Buildings within and adjoining the centre where an individual design approach will be required to ensure that large scale development <del>respects</del> <u>conserves and enhances</u> the historic character of these areas. Other locations that may be sensitive to tall buildings include those

No.	Page	Policy/ Paragraph	Proposed Change
			<p>areas near to the edge of the town centre boundary due to the close proximity of low scale high quality residential development, and those locations where tall buildings may impact on the Wimbledon Hill ridgeline, including long range views into the borough from Richmond Park.</p>
PC4	83	Table 17.1	<p><i>LDF Designation:</i>  <del>Neighbourhood Parades: convenience shopping and other services, easily accessible to those walking or cycling, or with restricted mobility.</del>  <i>Town Centres in Merton:</i>  <del>Various locations around the borough, see Proposals Map</del></p>
PC5	85	Table 17.2	<p><i>Retail row</i>  Local Centres and neighbourhood parades  <i>Wimbledon</i>  Expect that at least 80% of predicted comparison retail growth in the borough <u>to 2016</u> to be provided in Wimbledon town centre</p>
PC6	86	Table 17.2 Design: Wimbledon	<p><i>Wimbledon</i>  <del>Support high quality design and public realm improvements</del> <u>Improve the public realm to make the centre more attractive, legible and easier to get around for both pedestrians and traffic, promoting connections between the Broadway, Victoria Crescent, Queens Road and Wimbledon Bridge, recognising the centre's village origins where appropriate.</u></p>
PC7	87	Table 17.2 Additional Row	<p><i>Additional Row</i>  <i>First column:</i>  <u>Other uses that can be found in town centres e.g. Restaurants, cafes, takeaways, estate agents, gyms, healthcare facilities, banks, building societies, community and social infrastructure, places of worship, meeting halls, social clubs, etc.</u></p> <p><i>Second column:</i>  <u>Encourage a mix and range of uses that contributes to Wimbledon's position as an attractive major centre.</u></p> <p><u>Support provision of community and cultural facilities, especially around the existing hub at the eastern end of the Broadway. Non-retail generally will be encouraged away from Wimbledon's primary shopping frontage.</u></p> <p><u>Encourage co-location of facilities where appropriate.</u></p>

No.	Page	Policy/ Paragraph	Proposed Change
			<p><i>Third Column:</i>  <u>Provide opportunities for people to make more use of their District Centres and reduce the need to travel by encouraging a range of uses appropriate to the role and function of the district centre.</u></p> <p><u>Encourage co-location of facilities to create viable use of spaces and provision that meets the needs of the community and remains appropriate in a district centre setting.</u></p> <p><u>Colliers Wood</u>  <u>Encourage an improved range of town centre uses to complement the existing retail floorspace.</u></p> <p><i>Fourth column:</i>  <u>Provide opportunities for people to make more use of their local centres and reduce the need to travel by encouraging a range of uses appropriate to the role and function of the centre.</u></p> <p><u>Encourage co-location at facilities to create viable, effective use of spaces and provision that meets the needs of the local community and remains appropriate in a local centre setting.</u></p>
PC8	89	17.14	<p>Proposals for retail developments outside existing town centres and <u>local centres neighbourhood parades</u> will be resisted. Impact Assessments as detailed in PPS4 may be required for any retail proposals outside of town and Local Centres <del>above</del> <u>where the relevant floor area (as defined in the Sunday Trading Act 1994 as amended) would exceed 280 sq m, or any proposal considered by the council that would have significant impact on existing centres in the borough. The floorspace capacity</u> <del>This threshold</del> <u>is based on the definition of a "large shop" in the Sunday Trading Act 1994 (as amended) which regulates the Sunday trading hours of large shops. The act defines a 'large shop' as "a shop, which has a relevant floor area exceeding 280 square metres" (relevant floor area excludes areas not used for the service of customers in connection with the sale of goods for the display of goods). This measure is necessary as Merton is a small borough and mostly all town and local centres as well as neighbourhood parades are within walking distance of all residential areas in the borough. By implementing this threshold, upon which impact assessments may be required, will ensure that future proposals for retail that meets the everyday</u></p>



No.	Page	Policy/ Paragraph	Proposed Change
			<p><u>needs of residents (not weekly shopping needs) will be located within walking distance of all residents. By setting this threshold it will help to</u> This measure is required to protect the vitality and viability of the existing town and Local Centres in the borough.</p>
PC9	105	CS9 Delivery and Monitoring	<p>We will work with developers, Registered Social Landlords, the Homes and Communities Agency and the Environment Agency to facilitate provision of additional homes in the borough.</p> <p><u>In accordance with 22 'Design - Policy 14' , we will encourage all residential development to comply with the most appropriate minimum space standards.</u></p> <p>The delivery of Merton’s housing target will be monitored <u>annually</u> via the Annual Monitoring Report. <del>Assessment of p</del> Performance against this target will be <u>assessed</u> <del>monitored</del> on a five year rolling basis to determine whether and what intervening action needs to be taken. <u>As set out in Table 28.1, where this indicates that performance does not fall within acceptable ranges, the council will conduct a risk assessment after a rolling three year period and undertake management actions if this continues for an additional two years.</u></p>
PC10	107	CS 10	<p>Existing legally established Gypsy and Traveller accommodation sites will be retained and protected from redevelopment except where <u>the same number of pitches is provided on an alternative site is provided</u>. Proposals for additional, alternative or new Gypsy and Traveller sites will be assessed having regard to the following criteria:</p>
PC11	108	18.51	<p><del>The results of this assessment indicated a London wide target of 538 additional pitches which has been broken down to sub-regional and borough level targets. Following two rounds of consultation the GLA proposed a target of 9 additional pitches for Merton for the period 2007–2017. Consultation feedback on the Draft London Plan (2009) highlighted concerns regarding the methodology used to set targets for additional pitches and the achievability of these targets. As a result an Alteration to the Draft London Plan (2009) was published for consultation in March 2010 which sets out proposed revisions to the Gypsies and Travellers targets by reducing the London wide target from 538 to 238 and a target of 4 additional pitches for Merton.</del></p> <p><u>We will conduct a local assessment in collaboration</u></p>

No.	Page	Policy/ Paragraph	Proposed Change
			<u>with local Gypsy and Traveller communities to identify accommodation needs. Whatever the level of need that is identified either via a local or sub-regional needs assessment for Merton, it is considered that there are robust and clear criteria to help deliver additional pitches.</u>
PC12	108	18.53	<u>Additional pitches for Gypsy and Traveller accommodation in Merton will be delivered through the Local Development Framework (Site Allocations DPD or an Area Action Plan) or the Council's asset management or private windfall sites will consider the identification and allocation of additional pitches for additional Gypsies and Travellers accommodation in Merton.</u>
PC13	108	CS 10 Delivery and Monitoring	<u>The Site Allocations DPD or an Area Action Plan will consider the identification and allocation of the borough pitch target to be met through the Local Development Framework (Site Allocations DPD or an Area Action Plan) or via consideration of the Council's asset management or via private windfall sites. additional pitches for additional Gypsies and Travellers accommodation in Merton.</u>
PC14	109	CS 11(b)	<u>Working with partners to deliver adequate provision of services and facilities to match the projected population growth, especially in areas of significant new homes or areas of deficiency. Development proposals will be expected to identify, plan for and, where necessary, complete infrastructure prior to occupation;</u>
PC15	115	CS11 Delivery and Monitoring	<i>New para after 2<sup>nd</sup> para:</i>  <u>To ensure all elements of the proposed Core Strategy are delivered a supplementary document will be created to support development control practice. This will be a checklist for planning applications submitted and will identify what requirements are needed for a specific application type. For example, when dealing with a major application the need to refer to the infrastructure policy requirement on Health Impact Assessments (HIA's), planning obligations, preparation of essential infrastructure in advance of the development and other policy checks to be made including biodiversity matters within open space etc.</u>
PC16	122	New para below 20.15	<u>In recognition of the site-specific circumstances relating to the Locally Significant Industrial Sites at Rainbow Industrial Estate and Gap Road, a wider range of uses than B1b, c, B2 and B8 may be considered for each of these estates where these uses contribute to the site delivering Policy CS12 and meet the terms of</u>

No.	Page	Policy/ Paragraph	Proposed Change
			<p><u>other policies in the development plan for Merton. Any proposals seeking to incorporate uses other than B1b, B1c, B2 and B8 would be subject to the adoption of a planning brief (supplementary planning document) for the whole site setting out any employment led redevelopment proposals would meet the terms of Policy CS12 and the objectives of Merton's Economic Development Strategy.</u></p>
PC17	125	Delivery and Monitoring <i>new para below last paragraph</i>	<p><u>The Locally Significant Industrial Sites at Rainbow Industrial Estate and Gap Road incorporate the following characteristics:</u></p> <ul style="list-style-type: none"> <li>• <u>Issues with access and egress to the site</u></li> <li>• <u>The narrow linear nature of the site: bounded by the railway line and residential areas</u></li> <li>• <u>Proximity to local centres or neighbourhood parades</u></li> </ul> <p><u>Due to the specific characteristics of each of these sites, Policy CS12 and the objectives of Merton's Economic Development Strategy 2010 may be delivered through comprehensive plan-led redevelopment of the whole site. Proposals must be employment-led and may incorporate a greater mix of uses than B1b, B1c B2 and B8, where this contributes to the site meeting Policy CS12 and the objectives of Merton's Economic Development Strategy.</u></p> <p><u>Redevelopment of each of these sites for any other uses than B1b, c, B2 and B8 will be subject to the adoption of a planning brief as a Supplementary Planning Document to Merton's Core Strategy. The SPD will take a coordinated approach to cover the whole site and will include details of how the proposals will meet Merton's Core Strategy Policy CS12 and Merton's Economic Development Strategy, proposed uses, design, access and egress, viability of proposals and other considerations specific to the site. Each SPD must be prepared in close consultation with local communities and key stakeholders.</u></p>
PC18	151	CS14 Delivery and Monitoring	<p><u>We will produce supporting documents to assist with the implementation of the Policy CS14 Design Policy, including a New Residential Development SPD and a Design SPD which will provide additional guidance on matters including dwelling conversions, tall buildings, amenity space, appropriate space standards and other matters relating to new development (daylight, sunlight, overlooking etc)</u></p>
PC19	157	New paras after 23.31	<p><u>There is currently no nationally recognised sustainable design and construction standard covering the refurbishment of domestic dwellings. However, the</u></p>

No.	Page	Policy/ Paragraph	Proposed Change
			<p><u>BRE are currently developing the BREEAM Refurbishment standard to address this shortcoming. Once the BREEAM Refurbishment standard has been launched and an appropriate level of the scheme can be identified it is our intention to introduce a minimum standard for domestic refurbishment.</u></p> <p><u>More specific minimum BREEAM credit requirements may be recommended in relation to other issues (for example flooding or ecology) depending on a developments location and local environmental issues.</u></p>
PC20	157	New paras after 23.32	<p><u>As building regulations are tightened as part of the move to zero carbon development, Merton will continue to asses the viability of moving ahead higher levels of sustainable design and construction standard such as Code and BREEAM. Where evidence suggests that higher levels of sustainable design and construction standards are viable, these will be introduced. This will ensure that the highest viable level of sustainable design and construction are sought within the borough.</u></p> <p><u>Looking ahead to the implementation of the allowable solutions Merton will expect all on-site emissions reduction to be exhausted before examining any offsite emissions reductions through the allowable solutions.</u></p>
PC21	158	CS15 Delivery and Monitoring	<p>Performance against sustainable design and infrastructure aims will be monitored through planning applications and where applicable, <del>the Municipal Gauge renewables energy monitoring system</del> <u>Code for Sustainable Homes and BREEAM certificates and reports.</u></p>
PC22	159	CS 16 e.	<p>Propose and <u>ensure the implementation of</u> measures to mitigate flood risk across the borough that are effective, viable, attractive and enhance the public realm and ensure that any residual risk can be safely managed.</p>
PC23	163	Insert as new point after CS17(b)	<p><u>The South London Waste Plan DPD sets out the long-term vision, spatial strategy, policies and sites for the sustainable management of waste, how the strategy and policies will be delivered and a framework for monitoring policies against targets.</u></p>
PC24	163	CS17 SA/SEA Implications	<p><del>The 2007 SA findings were uncertain as to how this strategy would impact the borough until specific sites had been identified; a finding also shared by the 2008 Habitats Regulations Screening report commissioned by the four boroughs working on the Joint Waste DPD. The full impact on Merton can only be determined when specific sites are located across the four</del></p>

No.	Page	Policy/ Paragraph	Proposed Change
			<p><del>boroughs, which may not represent any additional capacity in Merton.</del></p> <p><del>It is possible that this strategy could reduce the environmental impact of managing and treating Merton's waste as we will have greater capacity to treat waste locally.</del></p> <p><u>The maximisation of self-sufficiency and recycling this policy, in conjunction with the policies in the South London Waste Plan, will reduce the need for landfill and the distance waste travels to be processed. The South London Waste Plan has been the subject of separate sustainability appraisal.</u></p>
PC25	164	25.3 (2nd bullet point)	<p>By 2020 we should have enough capacity to deal with <del>at least 85%</del> <u>all</u> of our own waste (from all sources), recycle and compost 70% of our commercial and industrial waste and reuse and recycle 95% of construction waste.</p>
PC26	164	25.5	<p><del>The South London Waste Plan will define the strategic approach to waste management across the four partner boroughs and set out planning policies to encourage waste minimisation, safeguard existing waste management sites and identify proposed new sites, as well as detailed criteria that any development proposal for waste management will need to satisfy, in line with the locational criteria set out in PPS10 and the London Plan. Prior to the South London Waste Plan being adopted in 2011/12, these criteria should be used in considering planning applications for new waste management facilities.</del></p>
PC27	165	Key Drivers	<ul style="list-style-type: none"> <li>• <del>South London Waste Plan (2011 2010 – ongoing)</del></li> </ul>
PC28	165	Key Drivers	<ul style="list-style-type: none"> <li>• <del>Mouchel: South London Waste Plan: Potential Sites Technical Report (2009)</del></li> <li>• <del>Mouchel: South London Joint Waste DPD: Building the evidence base for Issues and Options (May 2008)</del></li> </ul>
PC29	165	Key Drivers	<ul style="list-style-type: none"> <li>• <u>EU Waste Framework Directive 2008/98/EC</u></li> </ul>
PC30	165	CS17 Delivery and Monitoring	<p>Across the four boroughs around <del>20</del> <u>7</u> hectares of additional land is required to divert waste from landfill and use waste as a resource.</p>
PC31	168	CS11 Delivery and Monitoring	<p><i>Insert as first paragraphs:</i></p> <p><u>The Council will use funding annually secured through LIP funding applications to Transport for London together with Merton Capital to deliver active transport improvements in the borough.</u></p>

No.	Page	Policy/ Paragraph	Proposed Change
			<p><u>Between 2007 and 2011 the Council has successfully delivered major schemes which include significant active travel improvements at Mitcham Eastfields, Mitcham Junction, South Wimbledon Business Area benefiting from partnership funding.</u></p> <p><u>Delivery of the larger transport infrastructure projects will be dependent on significant investment from partners like Department for Transport, Transport for London, and Network Rail. Specific major projects that will deliver transport improvements in Merton are set out in Table 27.2 "infrastructure projects", particularly under the delivery of Strategic Objectives 7 and 8. The Council will use its lobbying power to enable Merton to benefit from other funding opportunities.</u></p> <p><u>Merton will continue to implement active transport and accessibility improvements through the use of planning obligations.</u></p>
PC32	180	CS20 Delivery and Monitoring	<p><u>This policy will be delivered through partnership working and the council's programme of works, for example public highway schemes, as well as through the development control process.</u></p> <p>All developments are assessed according to our maximum parking standards.</p> <p>Where a development will have significant transport implications, a Transport Assessment will be required. The Transport Assessment must evaluate the impact of the development on the existing transport network and provide for mitigation measures to alleviate any adverse effects.</p>
PC33	181	27.4	<p>Some elements of delivery and implementation rely more on partnership working, than necessarily being identifiable as specific project or funding needs. There are a number of different types of local delivery vehicles to coordinate funding and delivery, as well as informal partnerships, such as local community groups and interested parties.</p>
PC34	182	27.5 (added new subsection - subsection 7)	<p><u>Community groups including local interest groups, business associations, environmental and conservation, ethnic minority, housing associations, faith groups, residents associations, civic societies older person and youth groups.</u></p>
PC35	182	Table 27.1 Key Partners (First row	<p><u>Sutton &amp; Merton Primary Care Trust and successor commissioners</u></p>

No.	Page	Policy/ Paragraph	Proposed Change
		and first column)	
PC36	182	Table 27.1 Key Partners (First row and fourth column)	Merton Partnership Member. ( <u>Including through the Infrastructure and Investment Board</u> ).  Aalignment through joint working on <u>Local Area Action Plan (LAA)</u> – healthier communities and older people block.
PC37	182	Table 27.1 Key Partners (Second row and fourth column)	<u>Merton Partnership member (including the Infrastructure and Investment Board)</u> .
PC38	183	Table 27.1 Key Partners (Third row and first column)	London Development Agency (LDA) ( <u>GLA</u> )
PC39	183	Table 27.1 Key Partners (Third row and fourth column)	Through various projects e.g. <del>Merton Means Business co-ordinating</del> 'Go-Green Plus'.  <u>Including through Infrastructure and Investment Board.</u>
PC40	183	Table 27.1 Key Partners (Fourth row and fourth column)	Merton Partnership member, including through the infrastructure and Investment Board.  A-alignment through joint working on LAA – economic development and environment block.
PC41	183	Table 27.1 Key Partners (Fifth row and first column)	Registered Social Landlords (RSLs)-over 20 operate in the borough <u>including Merton Priory Home.</u>
PC42	183	Table 27.1 Key Partners (Fifth row and fourth column)	Partnership working to develop and deliver Housing Strategy, through a well established multi-agency partnership structure. <u>Merton Priory Homes is working on an estates renewal programme to improve the housing stock in partnership with the LSP, including through the infrastructure and Investment Board.</u>
PC43	183	Table 27.1 Key Partners (Seventh row and fourth column)	Own and manage Wimbledon Common <sup>7</sup> . Any proposals that affect the Common considered by the Board of Conservators.
PC44	184	Table 27.1 Key Partners (Ninth row	Working with councils on a collaborative and consultative basis. Developing strong relationships at national, regional and local levels, <u>including through</u>

No.	Page	Policy/ Paragraph	Proposed Change
		and fourth column)	<u>the Infrastructure and Investment Board.</u>
PC45	184	Table 27.1 Key Partners (Tenth row and fourth column)	<u>Including through the Infrastructure and Investment Board.</u>
PC46	184	Table 27.1 Key Partners (Eleventh row and first column)	Thames Water <u>and Sutton and East Surrey Water.</u>
PC47	184	Table 27.1 Key Partners (Eleventh row and second column)	Manage water and wastewater services, including operating the Thames Water Ring Main. <u>Some residents are served by Sutton and East Surrey Water.</u>
PC48	184	Table 27.1 Key Partners (Twelfth row and fourth column)	Alignment through joint working on LAA – <u>Environmental block and through work on managing flood risk and surface water flooding.</u>
PC49	185	Table 27.1 Key Partners (Thirteenth row and first column)	Network Rail, <u>Southern, South West Trains and First Capital Connect.</u>
PC50	185	Table 27.1 Key Partners (Thirteenth row and second column)	<u>Network Rail o-Owns and operates Britain's rail infrastructure. Merton's eleven rails stations are managed by three different operators: Southern, South West Trains and First Capital Connect for Network Rail.</u>
PC51	185	Table 27.1 Key Partners (Fourteenth row and first column)	<u>Network Rail o-Owns and operates Britain's rail infrastructure. Merton's eleven rails stations are managed by three different operators: Southern, Neighbouring boroughs including Wandsworth, Sutton, Croydon, Kingston and Lambeth Council.</u>
PC52	185	Table 27.1 Key Partners (Fourteenth row and second column)	Work in partnership on the delivery of cross borough initiatives. <del>, for example the Joint Waste Development Plan and the Wandle Valley Regional Park</del>
PC53	185	Table 27.1 Key Partners (Fourteenth row and second column)	<del>Our neighbouring boroughs are consulted upon proposals that may affect them or may require their involvement as interested parties from a sub-regional</del>



No.	Page	Policy/ Paragraph	Proposed Change
		row and fourth column)	<p>perspective-</p> <p><u>Wandle Valley Regional Park</u></p> <p><u>Go-Green Plus</u></p> <p><u>South London Waste Plan</u></p>
PC54	186	Table 27.1 Key Partners (Eighteenth row and first column)	<u>Local Community Groups</u>
PC55	186	Table 27.1 Key Partners (Eighteenth row and second column)	<u>Including local interest groups business associations, environmental and conservation, ethnic minority, housing associations, residents associations, civic societies, faith groups, older person and youth groups.</u>
PC56	186	Table 27.1 Key Partners (Eighteenth row and fourth column)	<p><u>Engagement through the LSP and the consultation process.</u></p> <p><u>moreMorden</u></p> <p><u>Wimbledon forecourt improvements</u></p> <p><u>Low carbon zone initiative</u></p> <p><u>Friends of parks groups</u></p>
PC57	186	27.9	We also work closely with Friends Groups, Resident's' Associations, <u>community groups</u> and local trusts.
PC58	186	Insert new paragraphs after 27.9	<u>The Public Reform Bill (May 2010) gives new powers to allow Ministers to abolish, merge or transfer functions from public bodies. The proposal will lead to the reduction in the number of public bodies (quangos). In October 2010 the Coalition Government published it's proposals for change, listing which bodies would be retained, merged, those that are to be reformed and those that will no longer remain as a non ministerial department or public body. As of November 2010 some bodies remain under consideration. The partners listed in this chapter are currently working with the council and we will continue to work with them in their current capacity and any successor bodies in the delivery and implementation of the Core Strategy.</u>
PC59	187	Para 27.13	Due to the general unpredictability of third party funding sources, the majority of work will be funded

No.	Page	Policy/ Paragraph	Proposed Change
			through the LIP <del>reporting and funding process</del> through which the council seeks funding from Transport for London (TfL) to carry out work on an annual basis.
PC60	206	Table 27.2	Revised Table 27.2 Infrastructure projects (Annex 1)
PC61	229	Table 28.1	Revised Table 28.1 Monitoring Framework (Annex1)

## Annex 1 to Appendix A Tables

PC72:

**Table 27.2: Infrastructure projects:**

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<b>Objective 1: To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.</b>							
<p><b>1A. Increased usage of SUDS: <u>Supporting the development of sustainable energy infrastructure</u></b></p> <p>Integrated low-carbon district heat and power (DHP) networks</p>	<p>Dependent on location and <u>suitability of building types and uses</u></p>	2016 - 2020	Emphasis on reducing CO2 emissions from new and existing development.	<p>Energy service companies (ESCos)/ multi utility service companies (MUSCos):</p> <p>Developers;</p> <p>Private sector partners:</p> <p>Merton</p>	<p>Section 106:</p> <p>Private Sector Partners;</p> <p>Merton Council</p>	<p>Impacts of climate change mitigated</p> <p>Reduce CO2 emissions</p>	<p>23. 'Climate Change – Policy 15'</p> <p>24. 'Flood Risk Management – Policy 16'</p> <p>11. 'Colliers Wood and South Wimbledon Sub-Area – Policy 1'</p>

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
				Council			12. 'Mitcham Sub-Area - Policy 2'  13 'Morden Sub-Area - Policy 3'
<b>1B.</b> Supporting the development of sustainable energy from waste infrastructure	<u>unknown</u>	Waste Procurement Plan <u>Joint Municipal Waste Management Strategy 2010 - 2026</u>	Municipal waste procurement	London Boroughs of Croydon, Kingston, Merton and Sutton.	Private Finance Initiative	Sustainable management of municipal waste <u>and reduction of CO2 emissions</u>	25 'Waste Management - Policy 17'
<b>1C.</b> Development to support Mitcham as a low- carbon zone	£45k	2009-2012	Emphasis on reducing CO2 emissions from new and existing development	<u>LDA/GLA</u> <u>ESCoS/</u> <u>MUSCoS;</u> <u>Developers;</u>	<u>LDA/GLA</u> <u>ESCoS</u> Section 106;	<del>Impacts of climate change mitigated</del> Reduce CO2 emissions	23 'Climate Change - Policy 15'  24 'Flood Risk Management

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
				Private sector partners; Merton Council <u>Local communities</u>	Private Sector partners; Merton Council		– Policy 16'  11 'Colliers Wood and South Wimbledon Sub-Area – policy 1 '16 Wimbledon Sub-Area – Policy 6'  12 'Mitcham Sub-Area – Policy 2'  13 'Morden Sub-Area – Policy 3'
<b>1D.</b> Sustainable Modes of Transport Strategy (SMOTS) (2010-2013)	£350k unknown	2010–2013 2011 - 2013	Achieving sustainable level accreditation for schools.	Merton Council; TfL;	TfL;	Safer, more accessible, efficient and attractive public realm.  Improved	26 'Transport – Policies 18-20'  23'Climate Change – Policy 15'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
						accessibility, transport choices, and healthy lifestyle.	
<p><b>1E. Green Infrastructure:</b></p> <p><u>This includes projects such as SUD's, open/ green space, tree planting and green roofs</u></p>	unknown	Ongoing	Adaptation to the impacts of <u>climate change</u>	Wandle Valley Green Grid/ All London Green Grid	Section 106; Private Sector partners; Merton Council	Adaptation to the impacts of <u>climate change</u> . Will also address <u>fluvial flooding and surface water run-off</u>	<p><u>19 'Infrastructure – Policy 11'</u></p> <p><u>21'Open Space, Nature Conservation, Leisure and Culture – Policy 13'</u></p> <p><u>22 'Design – Policy 14'</u></p> <p><u>23 ` Climate Change – Policy 15'</u></p> <p><u>14 'Flood</u></p>

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
							<u>Risk Management – Policy 16'</u>
<b>Objective 2: To promote social cohesion and tackle deprivation by reducing inequalities</b>							
<b>2A.</b> Primary (Strategy for Change) Capital Programme	Approx £145 m	£15 m 2010-2015 £15 m 2016-2020 £15m 2021-2025	To increase education achievement and well being including extended services with a priority towards areas of deprivation and lower achievement.  To compliment primary school expansion programme.	Merton Council (education authority)	Central Government funding	Providing quality choices to increase educational attainment.  Reduced inequalities; Skills match to sustain economic growth.	19 'Infrastructure – Policy 11'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<p><b>2B.</b> Provision of accommodation for 6<sup>th</sup> form: Provision in four Merton schools from 2010, prior to Building Schools for the Future initiative</p> <p><del>"2B. 6<sup>th</sup> Form accommodation removed. Already delivered.</del></p>	<p>Approx £12m</p>	<p>2010-2015</p>	<p>To improve local provision of post-16 opportunities.</p> <p>To meet young people and parental preference, ongoing population change to improve co-ordination of post-16 opportunities.</p> <p>To ensure existing 11-16 schools have same opportunities as neighbouring authority schools.</p>	<p>Merton Council (education authority)</p>	<p>Central Government funding</p> <p>LB Merton funding</p>	<p>Reduced inequalities; Skills match to sustain economic growth</p>	<p><del>19 'Infrastructure - Policy 11'</del></p> <p>20 'Economic Development - Policy 12.</p>



Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<p>2C. <u>Building Schools for the Future-2B. Secondary School building development programme- refurbishing, modelling or re-building all Merton secondary schools</u></p> <p>(11 schools including secondary aged specials)</p>	<p>Approx £160m</p>	<p>£30m 2010-2015</p> <p>£130m 2016-2020</p>	<p>To transform and regenerate schools and their communities through new provision, improving education achievement and well being including purpose built 6<sup>th</sup> form facilities. Entry 2010 and aim to start refurbishment by 2014/5.</p>	<p>Merton Council</p> <p>(cross-departmental)</p>	<p>Central Government funding</p> <p>LB Merton funding</p>	<p>Providing quality choices to increase educational attainment</p> <p>Reduced inequalities; skills match to sustain economic growth</p> <p><u>Improved environmental performance of buildings</u></p>	<p>19 ' Infrastructure -Policy 11'</p> <p>20 ' Economic Development - Policy 12'</p>

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<b>Objective 3: To provide new homes and infrastructure within Merton's town centres and residential areas through physical regeneration and realignment of space.</b>							
<b>3A.moreMorden</b>	Master planning, promotion and site assessment:  £250k - 2010/11  £370k- 2011/12  £400k - 2012/13  Capital funding for public realm improvements for Mitcham	MoreMorden Area Action Plan:  AAP Timetable  Consultation proposed for Summer 2010  Submission Autumn 2011  Adoption proposed for Summer 2012  An assessment of regeneration and delivery	To regenerate Morden through intensified development in and around the town centre.  Efficient use of council assets to unlock regeneration potential and attract private sector investment.	Merton Council  HCA  TFL:  London Underground  London Buses  TFL Streets  Design for London  LDA	Merton Council  TFL  HCA  LDA	Achieve the regeneration of Morden Town Centre into a vibrant sustainable and attractive town centre	13 'Morden Sub-Area - Policy'  22 'Design - Policy 14'  18 'Housing - Policies 8-10'  20 'Economic Development - Policy 12'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
	<p>Morden and Wimbledon:</p> <p>£2.5m – 2011/12</p> <p>£2.5m – 2012/13</p> <p>HCA Borough Investment Plan (TO BE AGREED):</p> <p>MoreMorden master planning and site viability work:</p> <p>£0.5m</p> <p>Project and development Management :</p>	<p>options such as Local Asset Backed Vehicle (LABVI), Public Private Partnerships etc. will be undertaken to identify the most effective method of achieving delivery of MoreMorden.</p>					

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
	£100k  Public Realm  £20m						
<b>3B.</b> Rowan High School – Proposal consist of 217 new homes and includes landscaped public park, new scout hut and community facilities and a new medical centre.	Funding comprised of HCA (Landowner) Crest Nicholson (Developer) with capital receipt to LBM (part land owner)  Receipt and overage agreements TBC	Rowan High School Planning Brief 2003  HCA grant provision  Establishment of a design workshop  Review of the Development Agreement  Joint working and partnership Approach	The proposal represents a sustainable form of mixed use development identified by the Departments of Communities and Local Government Design for Manufacture as an exemplar in demonstrating that high quality	HCA  Developer/ Housing Association (Wandle HCA)  Merton Council  SMPCT	HCA  Developer/ Housing Association  Merton Council  SMPCT	Required to provide additional housing, including much needed affordable housing and associated community facilities.  <del>The new medical centre will replace the existing facility and provide additional capacity for</del>	12 'Mitcham Sub-Area – Policy 2'  18 'Housing – Policies 8-10'  19 'Infrastructure – Policy 11'  22 'Design – Policy 14' 23 'Climate Change – Policy 15'  21 'Open Space,

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
		<p>between Merton Council, developer / housing association and HCA and SMPCT (or successor commissioner s)</p> <p><u>Due to commence early 2011</u></p>	<p>sustainably constructed homes could be achieved at a cost of £60k per unit.</p>			<p>the population of the proposed development.</p> <p><u>Health facility created to protect existing healthcare capacity of area and provide additional capacity for the population of the proposed development.</u></p>	<p>Nature Conservation , Leisure and Culture – Policy 13’</p>
<p><b>3C.</b> Brenley Playing Fields Mixed use proposal</p>	<p>Funding from HCA (landowner), Key London Alliance</p>	<p>Brenley Playing Fields Planning Brief 2003</p>	<p>Required to provide additional housing including</p>	<p>HCA Developer/ Housing Association</p>	<p>HCA Developer/ Housing Association</p>	<p>Provision of additional housing including much needed</p>	<p>12 ‘Mitcham Sub-Area – Policy 2’ 18 ‘Housing</p>

<b>Strategic Requirements</b>	<b>Cost</b>	<b>Delivery Phasing or known Action Plan</b>	<b>Need for scheme</b>	<b>Lead delivery agencies</b>	<b>Potential finding streams</b>	<b>Outcome</b>	<b>Core Strategy Policies Delivering</b>
consisting of 169 new homes and public open space	(First Time Buyer / Key Worker initiative) In-space Homes and Notting Hill Housing Association	Review of the Development Agreement  Joint working and partnership approach between Merton Council, developer / housing association and HCA.	much needed affordable housing and a new public open space.	Merton Council	Merton Council	affordable housing and a new public open space.	– Policies 8-10'  22 'Design – Policy 14'  21 'Open Space, Nature Conservation , Leisure and Culture – Policy 13'  19 'Infrastructure – Policy 11'  23 'Climate Change – Policy 15'
<b>3D.</b> Primary school expansion programme	Approx £50- <u>£100m</u>	£35m in 2010-2015  £15m 2016-	Required to meet ongoing growth in child	Merton Council (Education authority)		Enhanced community facilities	19 'Infrastructure – Policy 11'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
Increased primary school places provision through expansion of existing schools and a new school. Current estimate to provide an equivalent of <u>21 one-form entry (3419 places)</u> from 2008 to 2014 and <u>1 SEN unit.</u>		2020  Review in 2021-2025	population alongside housing development			<u>Improved environment performance of buildings.</u>	20 ` Economic Development – Policy 12`  21 `Open Space, Nature Conservation , Leisure and Culture – Policy 13`
<b>3E.</b> Merton College refurbishment	Approx £30m+		Required to meet ongoing population change alongside housing development.	Merton College	Section 106;  Building Schools for the Future;  Skills	Reduced inequalities; Skills match to sustain economic growth  <u>Improved</u>	19 `Infrastructure – Policy 11`  20 ` Economic Development – Policy 12`

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
					Council	<u>environmental performance of buildings</u>	
<b>3F.</b> Police	<u>Main funding from Met Police</u>  No cost to Merton	2010-2015	Improvements to accessibility to Police Stations	Metropolitan Police Authority;	Metropolitan Police Authority;	Emphasis on enabling flexible approach to better serve localities.	19 'Infrastructure - Policy 11'
<b>3G.</b> Police	<u>Main funding from Met Police</u>  No cost to Merton	2010-2015	Improvements to borough Policing	Metropolitan Police Authority;	Metropolitan Police Authority;	Emphasis on enabling flexible approach to better serve localities.	19 'Infrastructure - Policy 11'
<b>3H.</b> Fire	<u>Main funding from London Fire Brigade</u>  No cost to Merton	2010-2015	Upgrading of Brigade's estate as part of their property PFI project.  Upgrading of	London Fire Brigade	London Fire Brigade	Emphasis on enabling flexible approach to better serve localities.	19 'Infrastructure - Policy 11'



Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
			facilities.				
<p><del>31</del> Purpose built intergenerational centre in land adjacent to St. Markets Academy School</p> <p><b>31.</b> <u>Intergenerational Centre-removed</u></p> <p><u>Already delivered</u></p>	£2.7m	Completion due 2009/10	Additional integrated facilities for children, young people, families and older people. Assisting work between the generations.	Merton Council; Merton VSC	Merton Council; LDA Central Government Section 106	Improved social and economic wellbeing;  Reduced inequalities; Services cater for local needs  Social cohesion	19 'Infrastructure Policy 11'  12 'Mitcham Sub-Area Policy 2'
<p><del>32</del> Redevelopment of Pollards Hill Library (completion due 2009)</p> <p><b>31.</b></p>	Approx £1m		Access to support new housing development, increasing focus on co-location of	Merton Council Merton VSC	Section 106; Merton Council LDA;	Enhance community facilities in Pollards Hill  Improved social and	19 'Infrastructure Policy 11'  12 'Mitcham Sub-Area Policy 2'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<p><u>Redevelopment of Pollards Hill Library (completion due 2009)</u></p> <p><u>Already delivered</u></p>			services		<p>Department for Children, Schools and Families;</p> <p>Big Lottery Fund</p>	<p>economic wellbeing</p> <p>Reduced inequalities</p> <p>Services cater for local needs</p>	
<p><b>3K.</b> Library facilities in Colliers Wood</p> <p>(break clause in lease available 2010;</p> <p>Brown &amp; Root development has facility for library but the development is now uncertain;</p>	Approx £1.25m		<p>Support for skills development</p> <p>Information provision re council and other services as well as general</p>	Merton Council	<p>Section 106</p> <p>Merton revenue</p>	<p>Services cater for local needs;</p> <p>Improved social and economic well-being</p>	<p>19 'Infrastructure - Policy 11'</p> <p>11'Colliers Wood and South Wimbledon Sub-Area - Policy 1'</p>

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
Other options explored but nothing available)							
<p><b>3L. Mitcham Library</b></p> <p>Discussion only round how the library can support regeneration in Mitcham: If the location does not move then extensive rebuild internally to ensure between use of spaces that can co-locate other agencies and support learning.</p>	<p>Feasibility study 38k</p> <p>Rebuild-unknown</p>		<p>Skill development for employment and further education</p> <p>Health awareness to support Bridging the Gap</p> <p>Activities for teens – decrease fear of crime</p>	Merton Council	<p>Section 106</p> <p>Merton revenue</p>	<p>Enhanced community facilities</p> <p>Enhanced learning opportunities</p> <p>Better health outcomes</p> <p>Reduced inequalities</p>	<p>19 'Infrastructure – Policy 11'</p> <p>12 'Mitcham Sub-Area – Policy 2'</p>

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<b>3M.</b> Merton and Sutton Cemetery	£2m	2013	Provision of additional graveyard space to support both Merton and Sutton	Merton and Sutton Council	Merton/Sutton revenue	Enhanced community facilities.  Services which cater for local needs	19 'Infrastructure – Policy 11'
<b>3N.</b> New access road:  Road from Carshalton Road onto Willow Lane, Mitcham	£6m	2011-2015	Key to regeneration of Willow Lane, Mitcham	TfL  Merton Council	TfL  <u>Section 106</u>	Enhanced community facilities  Reduced inequalities	26 'Transport – Policies 18-20'  19 'Infrastructure – Policy 11'
<b>Objective 4: To make Merton more prosperous with strong and diverse long term economic growth</b>							
<b>4A.</b> Creative Business Units (Subject to approval by Cabinet of the Economic	unknown	2010-2025	Development of appropriate flexible space in the Wimbledon area for	Space provided by Merton	Section 106  Private Investment		20 'Economic Development – Policy 12'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
Strategy)			creative businesses				
<b>Objective 5: To make Merton a healthier and better place for people to live and work in or visit.</b>							
<b>5A.</b> Centre for Independent Living: Birches Close development	Costs to health are revenue funded	2011 2010 (subject to feasibility study)	Need to close NHS campus hospital at Orchard Hill and provide independent living accommodation by 2010.	Merton Council; SMPCT	Dept of Health	Accommodation which caters for residents need	19 'Infrastructure - Policy 11'  Policy CS9 'Housing Provision'
<b>5B.</b> Ongoing programme of enhancements to GP surgeries: To improve premises quality and cater for additional capacity to list size caused by	Costs to health are revenue funded. No capital costs incurred by the PCT.  Capital value circa £25m	Investment in GP surgeries in Colliers Wood, Mitcham, Raynes Park and Wimbledon by 2015  In Mitcham and St Helier	Required to meet ongoing population change and changes in services provision, alongside housing development. Greater focus on events and	NHS Trusts; SMPCT;  Merton Disability Services	NHS Trusts;  SMPCT funding;  Merton Council  Section 106	Reduced inequalities; Services which cater for local needs	19 'Infrastructure - Policy 11'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
housing developments:		2016-2020  In Morden 2021-2025	outreach using existing locations.  (Summer 2009 Raynes Park business case was approved).				
<b>5C.</b> Ongoing programme of enhancements to GP surgeries: To improve premises quality across Merton	Costs to health are revenue funded. No capital costs incurred by the PCT.  Capital value circa £5m	2010-2020	Modernisation and replacement across PCT.	NHS Trusts;  SMPCT;  Merton Disability Services	NHS Trusts  SMPCT funding  Merton Council  Section 106	Reduced inequalities; Services which cater for local needs	19 'Infrastructure – Policy 11'
<b>5D:</b> <del>Nelson Local Care Centre</del> <u>Protecting and improving the</u>	Costs to health are revenue funded. No capital costs	Delivery 2013	Improved local access to a wider range of services.	SMPCT	PCT funding  Section 106	Reduced inequalities; Services which cater for local needs	19 'Infrastructure – Policy 11'

<b>Strategic Requirements</b>	<b>Cost</b>	<b>Delivery Phasing or known Action Plan</b>	<b>Need for scheme</b>	<b>Lead delivery agencies</b>	<b>Potential finding streams</b>	<b>Outcome</b>	<b>Core Strategy Policies Delivering</b>
<u>healthcare capacity of the borough currently serviced by Nelson Hospital</u>	incurred by the PCT  Capital value £19m						
<del>5E. Wilson Local Care Centre and Intermediate Care Centre</del> <u>Protecting and improving the healthcare capacity of the borough currently serviced by Wilson Clinic</u>	Costs to health are revenue funded. No capital costs incurred by the PCT  Capital value £22	Delivery 2013	Improved local access to a wider range of services.	SMPCT	LIFT capital and PCT revenue	Reduced inequalities; Services which cater for local needs	19 'Infrastructure - Policy 11'
<del>5F. Morden Road Health Centre: To be synchronised with housing</del>		TBC  <u>Morden Area Action Plan</u>	Improved local access to a wider range of services	SMPCT	LIFT capital and PCT revenue  <u>Section</u>	Reduced inequalities; Services which cater for local needs	19 'Infrastructure - Policy 11'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<u>development in Morden</u>					<u>106</u>		
<b>5G.</b> Improvements to Leisure Centres: <u>Morden, Wimbledon and Colliers Wood Morden Park Pool, Wimbledon Leisure Centre and Cannons Leisure Centre</u>	<u>£1.8m</u> <u>£750k</u> <u>2010-2012</u>  <u>Thereafter</u> <u>£350k p.a.</u> <u>For 3 years</u>	<del>2009-2011</del> – Upgrade Boilers, Ventilation, Pumps etc.  Ongoing upgrades of facilities <del>2016</del> – 2025  Ongoing facilities maintenance improvements and development opportunities.  <u>2016-2025</u>	To keep the public leisure facilities up to date and fit for purpose	Merton Council  Leisure Contractors	Merton Council  Leisure Centre Operators Contractors  <u>Lottery</u>	<del>Contained in planned works.</del>  Leisure facilities meet operational standards for community leisure needs	19 'Infrastructure – Policy 11'  23 'Climate Change – Policy 15'  21 'Open Space, Nature Conservation , Leisure and Culture – Policy 13'
<b>5H.</b> Morden Park Pool: Replacement	<del>£10m</del> – <u>£12m</u>	2010-2015 subject to funding	<del>Deterioration of existing structures,</del>	Merton Council	Scheme delivered dependent	Improved opportunities for active	22 'Design – Policy 14'



Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
facility.	<u>£15m</u>		<u>Structural Improvements to facilities to meet community needs.</u>	Leisure Centre Operators Contractors	on funding. Portfolio of funding sources will need to be pulled together based on funding bids.	sport and <u>active recreation for local people</u>	21 'Open Space, Nature Conservation , Leisure and Culture – Policy 13'  19 'Infrastructure – Policy 11'
5I: Wimbledon Theatre: Improvements to <del>production area</del> <u>back of house and stage</u>	<del>£2m</del> <u>£2.6m (includes £1.5m preparatory work)</u>	2009 Stage improvements (£500k)  <u>Preparatory work (£1.5m)</u>  2010-2015 <del>11</del> Further back of house improvements ( <del>£1.5m</del> ) (£550k)	Enhance back of house and stage to enable large and more substantial West End shows to perform (e.g. Opera and Ballet).	Ambassador Theatre Group  Merton Council  New Wimbledon Theatre	Council Capital <del>09/10</del> <u>2011/12</u> - £550k  Ambassador Theatre Group 08/09 - £1.5m (Preparatory Work)	<del>Allows for improved opportunities for recreation and culture.</del>  Bigger and better shows for local peoples leisure time: Providing West End shows in the	19 'Infrastructure – Policy 11'  21 'Open Space, Nature Conservation , Leisure and Culture – Policy 13'  16 'Wimbledon

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
						suburbs	Sub-Area – Policy 6’  Policy CS 19 ‘Public Transport’
<b>Objective 6: To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place</b>							
<b>6A:</b> Protecting and enhancing open space: Creation and enhancement of Wandle Valley Regional Park		2021-2025	Emphasis on enhancing assets and improving access to increase usage.	Merton Council;  Groundwork Merton;  National Trust;  Mitcham Common Conservators  <u>Other Councils</u>	Section 106;  National Trust	Improved biodiversity and open spaces, with benefits for accessibility and healthy lifestyles.  <u>Green Infrastructure has part in helping to adopt to climate</u>	21 ‘Open Space, Nature Conservation , Leisure and Culture – Policy 13’  13 ‘Morden Sub-Area – Policy 3’  22 ‘Design – Policy 14’

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
						<u>change</u>	15 'Wandle Valley Sub-Area – Policy 5'
<b>6B.</b> Improvements to Morden Hall Park	Consultation 22k	2010-2025	Enhanced linkages to green space around Morden	Merton Council  Groundwork Merton  National Trust	Section 106;  National Trust	Improved biodiversity and open spaces, with benefits for accessibility and healthy lifestyles	21 'Open Space, Nature Conservation , Leisure and Culture – Policy 13'  22 'Design – Policy 14'  13 'Morden Sub-Area – Policy 3'  15 'Wandle Valley Sub-Area – Policy 5'
<b>6C.</b> Pathfinder Project: To	£1.2m	2010-2015	Improved biodiversity	Parks and open spaces	Pathfinder funding	Improved <u>facilities and</u>	21 'Open Space,

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
upgrade 14 22 play areas in parks, open spaces by 2012 and play spaces within housing sites by 2010.	(Subject to continued funding – yet to be confirmed)		and open spaces, with benefits for accessibility and healthy lifestyles.			open spaces, with benefits for accessibility and healthy lifestyles	Nature Conservation , Leisure and Culture – Policy 13' 22 'Design – Policy 14' 13 'Morden Sub-Area – Policy 3' 15 'Wandle Valley Sub-Area – Policy 5'
<b>6D.</b> Upgrade pavilions and buildings sited in green spaces across the Borough	<u>Circa £900m</u>	2010-2025	Improvements to building stock on open spaces  Emphasis on enhancing assets and improving	Parks and open spaces team	Section 106  Merton revenue	Improved <u>facilities</u> <u>biodiversity</u> and open spaces, with benefits for accessibility and healthy lifestyles	21 'Open Space, Nature Conservation , Leisure and Culture – Policy 13' 23 'Climate

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
			access to increase usage  Ensuring new stock is energy efficient.				Change - policy 15' 22 'Design - Policy 14'  25 ' Waste Management - Policy 17'
<b>6E.</b> Facilities provided to cater for waste: Nature of facilities required to be guided by Joint Waste DPD	Developer costs <u>Joint partners borough costs</u>	<u>South London Waste Plan Procurement 25 yrs</u>	Required to enable shift towards increasing composting and recycling	Developers	DEFRA  PFI	Sustainable management of waste	25 ' Waste Management - Policy 17'
<b>Objective 7: to make Merton a well connected place where walking, cycling and public transport are the modes of choice when planning all journeys</b>							
<b>7A.</b> Measures to reduce congestion in		2010-2020	Measures required to address	Private Car companies	Private Car Club companies	Improved accessibility, transport	26 ' Transport - Policies 18-

<b>Strategic Requirements</b>	<b>Cost</b>	<b>Delivery Phasing or known Action Plan</b>	<b>Need for scheme</b>	<b>Lead delivery agencies</b>	<b>Potential finding streams</b>	<b>Outcome</b>	<b>Core Strategy Policies Delivering</b>
<p>Mitcham Town Centre</p> <p>Improvements to parking, servicing and delivery.</p> <p>Expansion of Car Clubs</p>			congestion hotspots and make efficient use of highway capacity.	TfL Merton Council	TfL Merton Council Section 106	choices and healthy lifestyles	<p>20'</p> <p>12 'Mitcham Sub-Area – Policy 2'</p> <p>22 ' Design – Policy 14'</p>
<p><b>7B.</b> Maintenance of the TRLN in Merton: Strategic Road Network carriageway's – TRLN</p>		2010-2025	National target percentage of the Highway Authorities strategic road network where structural maintenance should be considered.	TfL	TfL	A safer, more accessible sustainable, efficient and attractive public realm.	<p>22 ' Design – Policy 14'</p> <p>26 ' Transport – Policies 18-20'</p> <p>22 ' Design – Policy 14'</p> <p>23 ' Climate Change – Policy 15'</p>
<p><b>7C.</b> Principal Road Network – LBM:</p>		2010-2025	BV223: Percentage of the local	TfL	TfL	A safer, more accessible sustainable,	<p>22 ' Design – Policy 14'</p>

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
(Maintenance of the TRLN in Merton)			authority principal road network where structural maintenance should be considered.			efficient and attractive public realm.	26 ` Transport – Policies 18-20`  22 ` Design – Policy 14`  23 ` Climate Change – Policy 15`
<b>7D.</b> Classified Road Network carriageway's	Approx £1m pa	2010-2025	BV224a: Percentage of the non-principal classified road network where maintenance should be considered.	Merton Council	Merton capital	A safer, more accessible sustainable, efficient and attractive public realm.	22 ` Design – Policy 14`  26 ` Transport – Policies 18-20`  22 ` Design – Policy 14`  23 ` Climate Change – Policy 15`

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
<b>7E.</b> Unclassified Road network – carriageway’s (Annual <u>responsive reactionary</u> maintenance programme)	Approx £100k pa	2010-2025	BV224b: Percentage of the unclassified road network where structural maintenance should be considered.	Merton Council	Merton revenue	A safer, more accessible sustainable, efficient and attractive public realm	22 ` Design – Policy 14` 26 ` Transport – Policies 18-20` 22 ` Design – Policy 14` 23 ` Climate Change – Policy 15`
<b>7F:</b> <u>Wimbledon Station Forecourt</u>	<u>32.3m</u>	<u>2010-2012</u>	<u>Improvements to forecourt, public realm and passenger movement</u>	<u>Merton Council;</u> <u>Network rail;</u> <u>Merton Chamber of Commerce</u>	<u>TfL</u> <u>Network Rail</u> <u>Section 106</u>	<u>A safer, more accessible, sustainable, efficient and attractive public realm</u>	<u>22 ` Design – Policy 14`</u> <u>16 `Wimbledon Sub- Area- Policy 6`</u> <u>26 `Transport – Policies 18-</u>



Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
							<u>20'</u>
<b>7FG:</b> Bus route improvements including improved provision in Mitcham and Pollards Hill		Northern Line upgrade during 2012-2016.	Emphasis on improving choices and safety to increase usage.	Merton Council; TfL; Network rail	Merton Council; TfL; Network rail	Reduced inequalities, improved accessibility and transport choices.	<u>26 'Transport – Policies 18-20'</u>  12 'Mitcham Sub-Area – Policy 2' 23 ' Climate Change – Policy 15'
<b>7GH:</b> Station improvements at Wimbledon and Raynes Park.  Improved interchange at Morden.  Tramlink improvements and extensions		<u>Crossrail line 2 is long term (2010 – 2025)</u>	Emphasis on improving choices and safety to increase usage.	Merton Council: TfL: Network Rail	Merton Council; TfL; Network Rail  <u>South West Trains</u>  <u>Section 106</u>	Reduced inequalities, improved accessibility and transport choices.	26 ' Transport – Policies 18-20'  12 'Mitcham Sub-Area – Policy 2'  13 ' Morden Sub-Area – Policy 3'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
to Mitcham and Morden  Aspiration for Crossrail Line 2 (Chelsea-Hackney line) to serve the borough (subject to funding)							16 'Wimbledon Sub-Area - Policy 6'  14 'Raynes Park Sub-Area - Policy 4'
<b>7H1:</b> <u>Improvement of pedestrian and cycle facilities and links</u>		2010-2025	Emphasis on improving choices and safety to increase usage	Merton Council	TfL;  Merton Council;	Improved accessibility; transport choices and healthy lifestyles. <u>Modal shift will facilities the reduction in CO2 emissions</u>	22 'Design - Policy 14'  26 'Transport - Policies 19-20'
<b>7F1:</b> Public Rights of Way (Annual	Approx £20k pa	2010-2025	BV178: The percentage of the total	Merton Council	Merton Council	A safe, more accessible, sustainable,	22 'Design - Policy 14'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
program to maintain level of access and signing of Merton's Public Rights of Way)			length of rights of way in the local authority area that are easy to use by the general public.			efficient and attractive public realm.	26 'Transport – Policies 18-20'  23 'Climate Change – Policy 15'  12 'Mitcham Sub-Area – Policy 2'
<b>7JK:</b> Strategic Road Network Footways – TRLN  (Maintenance of the TRLN in Merton)		2010-2025	BV 187: Percentage of the category 1, 1a and 2 footway network where structural maintenance should be considered.	TfL	TfL TfL Business Plan 2009 - 2018	A safe, more accessible, sustainable, efficient and attractive public realm.	22 'Design – Policy 14'  26 'Transport – Policies 18-20'  23 'Climate Change – Policy 15'  12 'Mitcham Sub-Area –

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
							Policy 2'
<b>7KL:</b> Principal Road Network Footways – LBM  (Maintenance of the TRLN in Merton)	Approx £100k pa	2010-2025	BV 187: Percentage of the category 1, 1a and 2 footway network where structural maintenance should be considered	TfL	TfL	A safe, more accessible, sustainable, efficient and attractive public realm.	22 'Design – Policy 14'  26 'Transport – Policies 18-20'  23 'Climate Change – Policy 15'  12 'Mitcham Sub-Area – Policy 2'
<b>7LM:</b> Classified Road Network Footways.	Approx £500k pa	2010-2025	BV224a; Percentage of the non-principal classified road network where maintenance should be	Merton Council	Merton revenue	A safe, more accessible, sustainable, efficient and attractive public realm.	22 'Design – Policy 14'  26 'Transport – Policies 18-20'  23 'Climate Change –

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
			considered.				Policy 15'  12 'Mitcham Sub-Area – Policy 2'
<b>7MN:</b> Unclassified Road Network Footways (Annual reactionary maintenance programme)	Approx £100k pa	2010-2025	BV224b: Percentage of the unclassified road network where structural maintenance should be considered.	Merton Council	Merton revenue	A safe, more accessible, sustainable, efficient and attractive public realm.	22 'Design – Policy 14'  26 'Transport – Policies 18-20'  23 'Climate Change – Policy 15'  12 'Mitcham Sub-Area – Policy 2'
<b>Objective 8: To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the functional and character of the borough.</b>							
<b>8A.</b> Investment in streetscene	£2 m capital allocation in	2010-2020	Emphasis on improvements	Merton Council	Merton Council	Enhanced public realm	22 'Design – Policy 14'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
improvements	(2005/2006) including Raynes Park	Improvements in Mitcham. Morden and Wimbledon  2021 – 2025  Improvements in Colliers Wood, Raynes Park, and key movement corridors.	delivery in accordance with Public Realm Strategy.	TfL	TfL	to improve quality of life, promote accessibility and economic growth.  <u>Improved local environment quality e.g. SUD's to address surface water flooding.</u>	11 ' Colliers Wood and South Wimbledon Sub-Area – Policy 1'  12 'Mitcham Sub-Area – Policy 2'  13 'Morden Sub-Area – Policy 3'  14 'Raynes Park Sub-Area – Policy 4'  16 'Wimbledon Sub-Area – Policy 6'
<b>8B:</b> Street	Approx	2010-2025	Maintaining	Merton	Merton	A safe, more	22 'Design –

<b>Strategic Requirements</b>	<b>Cost</b>	<b>Delivery Phasing or known Action Plan</b>	<b>Need for scheme</b>	<b>Lead delivery agencies</b>	<b>Potential finding streams</b>	<b>Outcome</b>	<b>Core Strategy Policies Delivering</b>
Lighting Replacement of existing and new columns  (Annual assessment of % existing columns to indemnify units in need of replacement working with EDF)	£150k pa		quality and quantity of street lighting essential for public safety and access.	Council	revenue	accessible, sustainable, efficient and attractive public realm.	Policy 14'  26 'Transport – Policies 18-20'  12 'Mitcham Sub-Area – Policy 2'  23 'Climate Change – Policy 15'
<b>8C.</b> Street Lighting Replacements of existing columns  (Annual maintenance of existing columns working with	Approx £300 pa	2010-2025	Maintaining quality and quantity of street lighting essential for public safety and access.	Merton Council	Merton revenue	A safe, more accessible, sustainable, efficient and attractive public realm.	22 'Design – Policy 14'  26 'Transport – Policies 18-20'  12 'Mitcham Sub-Area – Policy 2'

Strategic Requirements	Cost	Delivery Phasing or known Action Plan	Need for scheme	Lead delivery agencies	Potential finding streams	Outcome	Core Strategy Policies Delivering
EDF)							23 'Climate Change – Policy 15'
<b>8D.</b> Merton Abbey Chapter Housing Improvements	£300k	Colliers Wood	Providing or procuring the provision and management of or managing a different form of display of the Chapter Housing remains.	Merton Priory Trust  Merton Council  <u>Protection of Conservation and enhancement of historic environment</u>	Section 106	Enhance community facilities	19 'Infrastructure – Policy 11'  11 'Colliers Wood and South Wimbledon Sub-Area – Policy1'  22 'Design – Policy 14'



PC74:

**Table 28.1 Monitoring Framework**

<b>Strategic objective 1 – To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively</b>			
<b>CS Policy Ref</b>	<b>Indicator</b>	<b>Borough Target</b>	<b><u>Contingencies</u></b>

<p>CS15 Climate change</p>	<p><u>The number of developments or floor area in Merton that have been built to a higher level of Sustainable Design and Construction Standard or higher level of energy efficiency compared to the baseline level of Sustainable Design and Construction Standard or energy efficiency standards required by national policy.</u></p> <p>CO2 emissions from housing per head.</p> <p>Compliance with the Zero Carbon Building regulations will be ensured through the national timetable of sustainable design and construction standards.</p>	<p><u>The number of qualifying development (as specified in CS15 e. and f.) submitting viability assessments which prove that it is not viable to achieve targets set out CS15 should not exceed 50% of those submitted.</u></p> <p><u>Where the viability assessment does meet the sustainable design and construction targets set out in CS15 Merton will require 100% delivery.</u></p> <p>Reduction year on year.</p> <p>Meet government target for Zero Carbon Building.</p>	<p><u>The policy will be delivered through developer negotiations. The target that no more than 50% of developments should submit successful viability claims will give a good indication of whether the sustainable design and construction targets are pitched at the right level. Should the number of developments submitting successful challenges to the targets in CS15 exceed 50%, this will trigger a review of the viability of the targets set. However, due to the delivery of policy through developer negotiations there will need to also be internal qualitative checks to ensure that the goals of CS15 are being achieved. These will take the form of an annual review of the level of council resources needed to deliver policy CS 15 and the level of council resources available. The annual checks will enable any contingency planning.</u></p>
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<b>Strategic objective 2 to promote social cohesion and tackle deprivation by reducing inequalities</b>			
C CS2 Mitcham Sub Area	Increase the delivery of housing in Mitcham.	The major housing sites identified in the 'Infrastructure Projects' table are delivered within the plan period.	<u>Major housing sites in Mitcham:</u> - <u>Former Rowan High School – due on site March 2011</u> - <u>Former Brenley Playing Fields: due on site March 2011</u>
	Retail vacancy rate in Mitcham town centre.	Maintaining the retail vacancy rate below the national average for the annual monitoring year.	<u>Monitored in Annual Monitoring Report annually since 2004/05. In 2009/10 the retail vacancy rate for Mitcham town centre was 12% this is below the national average for 2009/10. If the target is above the national average for a rolling three year period, interventions through the Economic Development Strategy and planning interventions would be considered.</u>
<b>Strategic objective 3 – To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space</b>			
CS3 Morden Sub-Area	Increase the delivery of housing in Morden.	To deliver new housing in accordance with paragraph 13.5 and 18.42 (as updated) within the plan period.	

	Retail vacancy rate in Morden town centre.	Maintaining the retail vacancy rate below the national average for the annual monitoring year.	<p><u>Monitored in Annual Monitoring Report annually since 2004/05. In 2009/10 the retail vacancy rate for Morden town centre was 6.5% this is below the national average for 2009/10.</u></p> <p><u>If the target is above the national average for a rolling three year period, interventions through the masterplan, Economic Development Strategy and planning interventions would be considered.</u></p>
Policy CS4 Raynes Park Sub-Area	<p><u>Retail vacancy rate in Raynes Park Local Centre.</u></p> <p><u>Number of A1, B1 &amp; D1 uses in the Raynes Park Local Centre.</u></p>	<p><u>Maintaining the retail vacancy rate below the national average for the annual monitoring year.</u></p> <p><u>No net loss of A1, B1, D1 uses in Raynes Park Local Centre.</u></p>	<p><u>To be monitored in the Annual Monitoring Report.</u></p> <p><u>In 2009/10 the vacancy rate for Raynes Park was 5.4% this is below the national average.</u></p> <p><u>If the target is above the national average for a rolling three year period, interventions through the Economic Development Strategy and planning interventions would be considered.</u></p>

	Restricting further <del>out-of-centre</del> <u>town centre</u> type development around Shannon Corner that could locate in town centres.	No further <del>out-of-centre</del> <u>town centre</u> type development around Shannon corner that could locate in town centres	<u>Acceptable deviation around minor town centre type developments (e.g. small shop to serve local need). Unacceptable deviation would be major town centre type developments. If major town centre type developments were completed in Shannon Corner contingencies would be explored on inward investment and publicity for Wimbledon town centre and other nearby centres through the Economic Development Strategy.</u>
Policy CS8 Housing Choice	Number and proportion of new dwellings that are affordable <u>on sites with a threshold of 10 units or more.</u>	40% of all new housing <u>on sites with a threshold of 10 units or more to be affordable housing.</u>	<p><u>Although the proportion of new affordable housing has been annually monitored in the AMR since 2004/05, monitoring the target of new affordable housing against 40% of new residential units delivered annually will be a new target.</u></p> <p><u>If the total % of new affordable housing delivered annually falls below the 40% monitoring target over a three year period, planning interventions would need to be considered.</u></p>

	<p>Proportion of affordable dwellings: social rented and intermediate.</p>	<p>New affordable dwellings to consist of: 60% social rented and 40% intermediate provision</p>	<p><u>Although the proportion of new affordable housing tenure mix has been annually monitored in the AMR since 2004/05, monitoring the target against 60%:40%; social housing: intermediate respectively will be a new target.</u></p> <p><u>If the total % of social housing and intermediate residential units delivered annually falls below the 60% and 40% target over a three year period, planning interventions would need to be considered.</u></p>
	<p><del>Proportion of all new developments of 10+ units which include affordable housing.</del></p>	<p><del>To ensure that all developments of 10 or more dwellings including 40% affordable housing.</del></p>	<p><i>Target deleted as it is a duplication of a monitoring target.</i></p>
	<p>Proportion of all new developments of 1 to 9 units which include an affordable housing equivalent to that provided on-site as a financial contribution.</p>	<p>To ensure that all developments of 1 to 9 units include 20% equivalent to that provided on-site as a financial contribution.</p>	<p><u>This is a new monitoring target.</u></p> <p><u>If the total developments of 1- 9 units financial contributions fall below 20% affordable housing equivalent that could be provided on-site over a three year period, planning interventions would need to be considered.</u></p>

	The number and proportion of new dwellings built to 'Lifetime Homes' Standards	All new housing built to 'Lifetime Homes' Standards.	<u>This is a new monitoring target.</u>  <u>If we fail to meet this target over a three year period, planning interventions would need to be considered.</u>
	The proportion of dwellings designed to be wheelchair accessible, or easily adaptable for wheelchair users.	10% of all new housing designed to be wheelchair accessible, or easily adaptable for wheelchair users.	<u>This is a new monitoring target.</u>  <u>If % of all new housing designated to be wheelchair accessible, or easily adaptable for wheelchair users is below the 10% target over a three year period, planning interventions would need to be considered..</u>
Policy CS9 Housing Provision	Net additional housing completed over the plan period: 2011 to 2016 2016 to 2021 2021 to 2026 Total over 15 years	1,600 net additional units 2011 to 2016 1600 net additional units 2016 to 2021 1600 net additional units 2021 to 2026 15 years total 4,800	<u>Assessment of performance against this target will be monitored on a five year rolling basis to determine whether and what intervening action needs to be taken. As set out in paragraph 64 of PPS3: Housing, wWhere this indicates that performance does not fall within acceptable ranges, for example 10-20% the council will consider management actions conduct a risk assessment after a rolling three year period and undertake management actions if this continues for an additional two years.</u>

<b>Strategic objective 4 – To make Merton more prosperous with strong and diverse long term economic growth</b>			
CS1 Colliers Wood and South Wimbledon Sub-area	Designation of Colliers Wood as a District Centre in the London Plan hierarchy.	Adoption of masterplan by 2015 resulting in the designation of Colliers Wood as a District Centre.	<u>Merton Council works closely with the Environment Agency regarding effective flood mitigation and investment in flood defence in Colliers wood. Annual monitoring on progress of masterplan, (due to start in 2012). Contingency on delayed progress of masterplan around bidding for additional resources (funding, secondments etc) to progress masterplan</u>
	Improved range of town centre uses within Colliers Wood centre commensurate with it's retail offer as a District Centre	Additional town centre uses (not including retail) in line with the masterplan adoption from 2015	<u>If additional town centre type developments were not completed in Colliers Wood district centre, contingencies would be explored on inward investment for Colliers Wood district centre through the Economic Development Strategy.</u>
	Retail vacancy rate in Colliers Wood town centre following adoption of the masterplan from 2012.	<u>Maintaining the retail vacancy rate of below the national average for the annual monitoring year.</u>	<u>Monitored in Annual Monitoring Report annually since 2004/05. In 2009/10 the retail vacancy rate for Colliers Wood town centre was 14.8% this is above the national average for 2009/10.</u>  <u>If the target is above the national average for a rolling three year period, interventions through the masterplan and Economic Development Strategy and planning interventions would be considered.</u>



CS3 Wimbledon Sub-area	Retail vacancy rate in Wimbledon town centre	<u>Maintaining the retail vacancy rate of below the national average in Wimbledon Town Centre for the annual monitoring year.</u>	<p><u>Monitored in the Annual Monitoring Report annually since 2004/05. In 2009/10 the retail vacancy for Wimbledon Town Centre was 3.6% this is below the national average for 2009/10.</u></p> <p><u>If the target is above the national average for a rolling three year period the Economic Development Strategy and planning interventions would be considered.</u></p>
	Office vacancy rate in Wimbledon town centre	Office vacancy rate of below national average in Wimbledon town centre	<p><u>Although office vacancy rates have been monitored in the AMR since 2004/05 however office vacancy rates were not specified by area. This is a new target to be monitored in the Annual Monitoring Report.</u></p> <p><u>If the target is above the national average for a rolling three year period, interventions through the Economic Development Strategy and planning interventions would be considered..</u></p>

	<p>Comparison retail floorspace in Wimbledon town centre</p>	<p>Growth in comparison retail floorspace in Wimbledon town centre</p>	<p><u>To be monitored annually in the Annual Monitoring Report.</u></p> <p><u>Monitored in the Annual Monitoring Report since 2004/05 to 2005/2006. However since then this has been monitored as part of the annual shopping survey and town centre health checks.</u></p> <p><u>If the target shows no growth or a decline in existing comparison retail for a rolling three year period, interventions through the Economic Development Strategy and planning interventions would be considered.</u></p>
	<p>Major office development in Wimbledon town centre</p>	<p>New major office floorspace to locate in Wimbledon town centre</p>	<p><u>This is a new target to be monitored annually in the Annual Monitoring Report</u></p> <p><u>Monitored as part of the overall office growth for the borough in the Annual Monitoring Report annually since 2004/05 however growth in office monitoring was not categorised by area.</u></p> <p><u>If the target shows no growth or a decline in existing office floorspace for a rolling three year period, interventions through the Economic Development Strategy and planning interventions would be considered.</u></p>

<p>CS7 Centres</p>	<p>Amount of completed retail, office and leisure development. Percentage of retail offer and leisure development found in town centres (COI)</p>	<p>More than 50% of A1 and A2 uses to be sited in Major or District Town Centres of Wimbledon, Mitcham, <del>or</del> Morden or Colliers Wood (<u>seeking re-designation</u>). Remaining developments (to make up a total of 100%) should be located in Local Centres and Neighbourhood Parades.</p>	<p><u>Monitored in the Annual Monitoring Report annually since 2006/07. In 2009/10 on average, 66% of A1 and A2 uses were sited in Major or District Town Centres of Wimbledon, Mitcham, Morden or Colliers Wood (seeking re-designation).</u></p> <p><u>If the target falls below 50% for a rolling three year period, interventions through the Economic Development Strategy and planning interventions would be considered.</u></p>
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<p>CS12 Economic Development</p>	<p>Retention of existing employment facilities or refurbishment to provide attractive business space.</p>	<p>No net loss of employment land for which there is a demand. As measured each year in the Annual Monitoring Report. Target to be considered on 5-year basis.</p>	<p><u>This is a new target to be monitored annually in the AMR.</u></p> <p><u>Merton's employment land has been monitored in the Annual Monitoring Report annually since 2004/05 however has not been monitored against loss of employment land for which there is demand.</u></p> <p><u>If the target shows that there is a decline in employment land for which there is a demand over a five year period (employment land needs will be forecasted based on five year increments), interventions through the Economic Development Strategy and planning interventions would be considered.</u></p>
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	<p>Support to local businesses (see above).</p>	<p>As set out in Merton's Economic Development Strategy (detailed initiatives).</p>	<p><u>This is a new target to be monitored annually in the AMR.</u></p> <p><u>Based on the monitoring of the net loss of employment land for which there is a demand over a five year period (see above), this indicator will demonstrate if the detailed initiatives used by Merton Council in the Economic Development Strategy are being successful.</u></p> <p><u>If the target shows that there is a decline in employment land for which there is a demand over a five year period and that the initiatives used by Merton Council are not successful; the Council will need to consider using alternative initiatives in / interventions through the Economic Development Strategy. Also planning interventions would be considered.</u></p>
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<b>Strategic objective 5 – To make Merton a healthier and better place to live and work in or visit</b>			
CS5 Wandle Valley Sub-area	Progress towards designation of Wandle Valley Regional Park	Creation of the Wandle Valley Regional Park	<u>The regional park is the basis for the sub-area inclusion. Reporting on the progress of the creation of the park will be an appropriate indication of the Sub-area development as the park is not only about promoting open spaces, it is also about encouraging planning and development, industry, heritage and maximising economic potential. Contingency not realistic or appropriate.</u>

<p>Policy CS10 Accommodation for Gypsies and Travellers</p>	<p>Net additional pitches for Gypsies and Travellers within the borough as set <del>out in regional Guidance</del> <u>identified through local research or the publication of the London Plan.</u></p>	<p><del>Once borough target for new pitches is [to be] established, it will be delivered through a [in the] Site Allocations DPD or an Area Action Plan [or Masterplan] or via the Council's asset management review.</del></p> <p>Borough <u>pitch</u> target to be <del>established</del> <u>met</u> through the <u>Local Development Framework</u> in the (Site Allocations DPD or an Area Action Plan) <del>or Masterplan</del> <u>within the timeframe specified in the sub-regional or local assessment.</u></p>	<p><u>Contingencies not appropriate while target unknown but could be around using the Council's or partner assets to deliver suitable accommodation if new sites were needed and none were forthcoming via DPDs.</u></p>
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<u>CS11 Infrastructure</u>	<u>Healthcare delivery</u>	<u>Delivery of healthcare projects in line with the Infrastructure Projects Table.</u>	<u>Contingencies if developments did not come forward as set out in the 27.2 Infrastructure projects table would be around requiring people to travel further to access primary healthcare or by exploring the capacity to create new health facilities in alternative locations (e.g. large supermarkets or as part of hospitals. Acceptable deviation will be explored during the plan period with respect to factors such as population growth, housing growth, capacity and range of existing facilities.</u>
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<p><u>CS1 3</u> <u>Open space, nature conservation leisure and culture</u></p>	<p><u>Protection and enhancement of open space and creating opportunities for culture, sport, recreation and play facilities.</u></p>	<p><u>No net loss of open space apart from that needed for schools.</u></p> <p><u>Continued investment in open space, leisure and play facilities in Merton. (Baseline £200k pa)</u></p>	<p><u>In line with PPG17 and the London Plan, open space will continue to be protected. We currently report any losses of open space in our Annual Monitoring Report (AMR) This will continue to be measured. The policy is ancillary to the London Plan policy to protect open space.</u></p> <p><u>If open space, leisure or play facilities were lost, contingencies would be explored where appropriate around the enhancement of nearby open space.</u></p> <p>Income from s106 over past 5 years equates to approx £1m so suggested baseline target of £200k per year.</p> <ul style="list-style-type: none"> <li>- <u>Contingency if we didn't get this investment for more than 3 years in a row could be to increase council expenditure on open space / sports; attract more investment via marketing / commercialisation, encourage facilities to be owned or managed by external groups.</u></li> </ul>
<p><b>Strategic objective 6 – To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place</b></p>			
<p>CS13 Open space, nature conservation leisure and culture</p>	<p><del>Protection of open space</del></p>	<p><del>No net loss of open space apart from that needed for educational establishments</del></p>	<p><i>Now in SO5 above</i></p>

	Proportion of local sites where positive conservation management has been or is being implemented (NI197)	Increase in proportion (Baseline of 50%)	<u>To be monitored in the Annual Monitoring Report. The conservation management implementation rate in 2009/10 was 60%. Contingency would be to increase council expenditure on conservation or find alternative funding, e.g. contributions from development.</u>
	Protection of biodiversity	Changes in areas of biodiversity importance. (Core Output Indicator E2)	<u>To be monitored annually in the Annual Monitoring Report. In 2009/10 there was no loss or addition of in areas of biodiversity importance.</u>
	<del>Percentage of adults participating in at least 30 minutes moderate intensity sport and recreation, three or more times a week.</del>	<del>Delivery of leisure projects in-line with the Infrastructure Projects Table.</del>	

CS16 Flood Risk Management	Improve flood risk management (NI 189).	<del>Percentage of</del> Agreed actions to implement long term flood and coastal erosion risk management plans that are being undertaken satisfactorily <u>with the Environment Agency and in line with Merton's NI 189 Flood Risk Management Plan.</u>	<u>NI 189 will be monitored annually in Annual Monitoring Report.</u>  <u>Contingency through Merton's Flood Risk Management group (highways, planning policy, DC, emergency planning, housing) and Environment Agency who meet regularly to monitor and review the management plan. The group will react to identified risks and take appropriate action with guidance from the Environment Agency.</u>
	Promote sustainable drainage systems (NI 189).	In line with Merton's NI 189 Flood Risk Management Plan <u>targets</u>	<u>As above; Contingencies will be identified through the Flood Risk Management Group.</u>
CS17 Waste Management	<del>To identify sufficient capacity through the production of a Joint Waste DPD to identify sufficient capacity.</del>	Adoption of Joint Waste DPD in 2012 to identify sufficient combined waste management capacity for <del>1,332</del> <u>1,366</u> thousand tonnes by 2021.	<u>It would be inappropriate to identify ranges of acceptable deviation of performance against targets for Policy CS17 – Waste Management because they are related to the collective performance across all four partner boroughs within the South London Waste Plan area.</u>
	<u>% of household municipal waste recycled and composted.</u>	<del>35% by 2010, 45% by 2015, 50% by 2020</del> <u>(Draft Replacement London Plan 2009) (baseline 2010).</u>	<u>It would be inappropriate to identify ranges of acceptable deviation of performance against targets for Policy CS17 – Waste Management because they are related to the collective performance across all four partner boroughs within the South London Waste Plan area.</u>

	<p>Amount of household waste landfilled and composted % of commercial and industrial waste recycled and composted.</p>	<p>Reduction in the amount of household waste landfilled- 70% by 2020 (Draft Replacement London Plan 2009) (baseline 2010).</p>	<p><u>It would be inappropriate to identify ranges of acceptable deviation of performance against targets for Policy CS17 – Waste Management because they are related to the collective performance across all four partner boroughs within the South London Waste Plan area.</u></p>
	<p>Loss of existing facilities sites without adequate compensatory measures to manage the necessary waste (baseline September 2008 2010).</p>	<p>Zero loss of existing sites without adequate compensatory measures to manage the necessary waste (baseline September 2008 2010).</p>	<p><u>It would be inappropriate to identify ranges of acceptable deviation of performance against targets for Policy CS17 – Waste Management because they are related to the collective performance across all four partner boroughs within the South London Waste Plan area.</u></p>
<p><b>Strategic objective 7 – To make Merton a well connected place where walking, cycling and public transport are the modes of choice when planning all journeys</b></p>			

CS1 8 Active Transport	Production of a new Sustainable Transport Strategy for Merton.	<p><u>Decrease in the mode share for car trips in the London Borough of Merton (1% decrease 2015 from a base TBC through discussions with TfL in March 2010). (3-5 year review in line with LIP)</u></p> <p><del>To increase the proportion of trips made using sustainable modes (public and active transport), by 1% per year, from 2004 base of 34%.</del></p>	<p><u>The Sustainable Transport Strategy and Local Implementation Plan (LIP2) 2011 -2026 has been approved by Cabinet for formal consultation. To identify the effectiveness of this strategy a series of performance indicators has been developed to measure the strategic objectives and the MTS goals and objectives. TfL require annual monitoring and a progress report at the end of the third year. The Performance indicators are:</u></p> <ul style="list-style-type: none"> <li>• <b><u>PI 1:</u></b> <u>Decrease in the mode share for car trips in the London Borough of Merton</u></li> <li>• <b><u>PI 2:</u></b> <u>Increase in the mode share for cycling trips in London Borough of Merton</u></li> <li>• <b><u>PI 3:</u></b> <u>Increase in the mode share for walking in London Borough of Merton</u></li> <li>• <b><u>PI 4:</u></b> <u>Increase in the mode share for public transport in London Borough of Merton</u></li> <li>• <b><u>PI's 5 - 8:</u></b> <u>Reduction in total number of people killed or seriously injured in Road Traffic Accidents in London Borough of Merton (inc; Children, Cyclists and Motor cyclists</u></li> <li>• <b><u>PI 9:</u></b> <u>Maintain mean Excess Waiting Time</u></li> <li>• <b><u>PI 10:</u></b> <u>Reduction in % of principal road network in need of repair</u></li> <li>• <b><u>PI 11:</u></b> <u>Reduction in CO2 emissions in London Borough of Merton</u></li> </ul>
	Improvement to walk and cycle network.	To reduce carbon emissions through promotion of sustainable transport.	
	Increase in external funding.		
	Estimated annual carbon savings.		
<u>Increasing physical activity as part of everyday activity</u>	<u>Increase in footfall at bus, underground and mainline stations. (Assume travellers in Merton walk to public transport facilities).</u>		

Policy CS1 9 Public Transport	Production of a new Sustainable Transport Strategy for Merton.	A convenient, safe and integrated transport network, accessibility to all parts of the borough.	<ul style="list-style-type: none"> <li>• <b>PI 12:</b> <u>Decrease in the total amount of children travelling to school by car in London Borough of Merton</u> <u>As part of the review mitigation and reprioritising of the LIP2 proposals and funding will be considered for any area underperforming or failing area of performance.</u></li> </ul>
	Increase patronage levels.		
	Results of 'Hands up' surveys of school plans to show positive modal shifts to sustainable travel modes.	All schools to have a school travel plan.	
	Production of a new Sustainable Transport Strategy for Merton.	TfL and Mayor of London; introduction of new hybrid technology buses in London.	
	Estimated annual carbon savings.		
CS20 Parking, service and delivery	Production of a new Sustainable Transport Strategy for Merton.	Expansion of Controlled Parking Zones.	
	Number of new or enhanced CPZ's (Controlled Parking Zones).		
	Effective enforcement of CPZ's.		
	Percentage of change in traffic generation.	Reduction in growth of traffic generation.	
	Number of car clubs and electric cars.	Increased uptake of sustainable modes (car clubs and electric cars).	

	Percentage change in levels and spread of car ownership.	Reduction in car ownership levels.	
<b>Strategic Objective 8 – To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough</b>			
CS 14 Design	Listed Buildings at Risk in Merton.	Number of Listed Buildings at Risk in Merton to be at or lower than the average in Merton in a rolling 5 year period.	<u>Average number of buildings at risk in Merton from 2005-10 = 8 buildings at risk (baseline for 2011-12.</u> <u>If rose for more than three consecutive years, contingencies would be explored appropriate to the site.</u>
	The number of planning appeals dismissed per total number of appeals citing design policies.	Increase in the % of appeals dismissed per total number of appeals citing design policies.	<u>Of the appeals citing design policies (UDP Built Environment policies) in 2010, 70% were dismissed and 30% were permitted. We will be seeking an increase, however if the ratio of 70% dismissed falls by 10-20% we will identify the aspects of design policy which are failing and provide additional planning guidance.</u>
	The number of total new build completions on housing sites (with at least 10 new dwellings) reaching very good, good, average and poor ratings against the Building for Life criteria.	<u>Year on year increase in the number of major housing completions reaching very good or good ratings (measured in LDD).</u>	<u>If year on year decrease in completions reaching this target for a rolling three year period, then contingencies will be pursued around extra investigation and advice on Design and Access statements submitted with new major housing applications, to improve design standards.</u>

	Protection of family sized units in dwelling conversions.	All conversion of existing <u>family sized</u> single dwellings into two or more smaller units to include the re-provision of at least one <u>family sized</u> unit.	<u>Enforce where this is not being adhered to through the development control process.</u>
	Public realm improvements.	Delivery of public realm projects in-line with the Infrastructure Projects Table.	<u>If projects weren't being delivered in line with the Infrastructure Projects table or significant new development, then bid for more money through LIP, explore additional public realm and design guidance, use planning obligations in more targeted way to address area-based deficiencies.</u>
	<u>To improve urban design and the local environment</u>	<u>Increase number of major schemes reviewed by the Design Review Panel at pre-application stage from 2 per year</u>	<u>Strengthen pre-application process in this regard if this target was not being met through the current arrangements.</u>
	<u>To improve urban design and the local environment</u>	<u>Increase number of major schemes reviewed by the Design Review Panel at pre-application stage from 2 per year</u>	<u>Strengthen pre-application process in this regard if this target was not being met through the current arrangements.</u>



## Appendix B – The Council’s minor changes

### The Council's suggested minor changes at submission (Document MD4.4) from the Council’s statements and the examination hearings)

The changes below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text.

No.	Page	Policy/ Paragraph	Suggested Change
SC1	2	2.3	The Core Strategy will be supported by other Development Plan Documents (DPDs) which will provide more guidance on specific details. All other <u>local</u> policy documents have to be in line with Merton's Core Strategy...
SC2	5	Paragraph 2.5	<p><del>This document is Merton Council's final Core Strategy that we want to submit to the Secretary of State for an independent examination. It sets a full set of strategic policies, taking account of the latest guidance and evidence to emerge and what people and organisations have told us at public consultation.</del></p> <p><u>All maps and illustrations within this Core Strategy have been produced at a point in time. Whilst every effort has been made to provide clear and current data on our maps, the data is reviewed over time and is to be used for illustrative purposes only. More detailed and up-to- date maps to inform site development proposals should be sourced from Merton Council's most recently adopted Proposals Map, or in the case of flood risk, from the Environment Agency website</u></p>
SC3	5	Para 2.6	Between 9 <sup>th</sup> August and 30 <sup>th</sup> September we <del>will</del> <u>published</u> Merton’s Core Strategy to allow representations relating to issues of soundness to be made and taken into account at the independent examination. Any representations <del>will be</del> <u>were</u> forwarded to the Planning Inspector, together with Merton Council’s response to the representation, for consideration at the Examination. <del>Refer to T</del> the diagram below <del>illustrating</del> <u>illustrates</u> the examination process.
SC4	6-7	Paras 2.8-2.13	<i>Delete paras 2.8-2.13</i>
SC5	7	New para	<u>Merton's Core Planning Strategy should be read as a whole. Any lists or criteria set out within the document</u>

No.	Page	Policy/ Paragraph	Suggested Change
			<u>should be considered equally and are not in priority order unless explicitly stated.</u>
SC6	11	4.3	Due to its location, the borough has always benefited from its proximity and good connections to central London, while also being able to maintain a more suburban feel than <del>some other</del> <u>neighbouring</u> inner London boroughs.
SC7	13	Fig 4.2	<i>Key Features of Merton illustration to be updated</i>
SC8	15	4.14	The GLA produce two rounds of <u>population</u> projections: 'High' and 'Low'.
SC9	16	4.20	... during this time. <u>Partly as a result of this natural increase, the Office of national statistics estimates Merton's population to have already reached 206,400 by mid 2009.</u> If this spike continues...
SC10	18	5.2	The inequalities identified in Merton in terms of access to jobs and services, including housing choices, <u>healthy lifestyles</u> and learning opportunities, need to be reduced.
SC11	18	5.3	Bringing together a joined up approach with physical regeneration and other measures outside of planning will help do this. Regeneration of Mitcham and Morden will increase opportunities, <u>improve people's quality of life including housing choice, economic vitality, health facilities</u> and the quality of the environment in the east of the borough. Wimbledon is Merton's greatest economic asset, having excellent transport links, surrounded by attractive homes, open space and facilities and a unique globally recognised "brand".
SC12	18	5.5	It is recognised that changes in lifestyle and the nature of development are necessary in order to combat the impacts of climate change. Predictions show that summers are likely to be drier and hotter with water shortages occurring more frequently. We are already feeling the effects of increased incidences of extreme weather conditions with flooding or drought affecting property and people and the consequent increase in energy and insurance bills, <u>and effects on health.</u>
SC13	19	5.11	The Core Strategy needs to <del>be aware</del> <u>take into account</u> of the impact of the downturn, particularly in forming realistic expectations about what may happen in the short-term, but also to remain focused on setting a positive, long-term framework, to shape places and support regeneration. Future LDF documents can
SC14	19	5.13	National and regional guidance directs higher density development to areas of highest public transport accessibility. There is a need to improve inclusive access and feelings of safety and security. Targets for new and affordable homes need to be met, within the constraints of <del>protecting</del> <u>conserving</u> and enhancing the

No.	Page	Policy/ Paragraph	Suggested Change
			existing quality and character of the boroughs suburban areas, the historic environment and the wealth of green spaces while providing the necessary services and infrastructure. New development must meet the highest design and environmental standards.
SC15	20	5.15	Merton has a young and diverse population that can help improve the borough's economic activity and convey its inherent cultural strengths through the delivery of high quality places of character and identity. <u>Merton's older population is also increasing, which helps create stable communities.</u> However, <del>€</del> This diversity also gives rise to specific needs such as accommodating larger households, <u>and specialist homes,</u> providing a <u>wider changing</u> range of community and cultural facilities and the need for more school places.
SC16	24	6.14	The London Plan Consolidated with Alterations since 2004 (published February 2008) is the <del>published</del> <u>adopted</u> Regional Spatial Strategy for London. In October 2009, a new draft replacement London Plan was published for public consultation (known as the draft London Plan 2009). The timetables for preparing Merton's Core Strategy and the draft London Plan mean that Merton's Core Strategy is likely to be towards the end of its examination as the replacement London Plan is formally published as the new Spatial Development Strategy for London.
SC17	24	6.15	Merton's LDF needs to be in general conformity with the <del>published</del> <u>adopted</u> London Plan unless local evidence indicates otherwise; the development plan for Merton is composed of both Merton's LDF and the London Plan. Policies and guidance contained in both plans must be considered when determining planning applications and development proposals for Merton.
SC18	24	6.16	In preparing Merton's Core Strategy, we have had main regard to the <del>published</del> <u>adopted</u> London Plan 2008, and the draft London Plan 2009 as a material consideration. In general, there are many similarities to the approach across the two plans. Where there are obvious differences in approach or in detail between the <del>published</del> <u>adopted</u> and draft London Plans, we have had regard to local evidence where this is relevant, robust and up-to-date.
SC19	25	6.19	There are differences in the approach and detail between the <del>published</del> <u>adopted</u> 2008 and draft 2009 London Plans on housing matters. A wealth of up-to-date local evidence on the potential locations,

No.	Page	Policy/ Paragraph	Suggested Change
			volume, and delivery of new homes in Merton supports an approach that is in closer conformity with the 2009 draft London Plan. Merton's approach to providing its share of London's new homes is set out in Chapter Housing - policies 7-9.
SC20	25	6.24	<del>Up-to-date local evidence</del> Evidence for, or relevant to, Merton, includes the <u>London Strategic Housing Land Availability Assessment and Housing Capacity Study 2009</u> , the <u>South West Strategic Housing Market Assessment (2010 – final draft)</u> , <u>Merton's Strategic Housing Market Assessment (2010 - in progress)</u> and <u>Merton's Affordable Housing Viability Assessment (2010)</u> and <del>PPS3-compliant evidence on projected delivery in Merton including consultations with landowners, developers infrastructure partners and Registered Social Landlords.</del> The large body of local <u>housing evidence on housing delivery</u> for Merton supports the borough's capacity to deliver 320 homes per year, 40% of which could be affordable.
SC21	26	6.31	...This <del>Framework plan</del> , although still relevant, may be replaced with a more up-to-date implementation strategy to which Merton's Core Strategy will have to be in general conformity with.
SC22	29	Spatial Vision (f)	<del>Protecting</del> <u>Conserving</u> and enhancing Merton's green character and historic environment;
SC23	29	Spatial Vision (i)	Supporting local community life through education and employment opportunities, cultural and sporting assets, community services, <u>healthcare</u> , recreational activities and other infrastructure that meets local needs;
SC24	31	7.8	...Decentralised renewable and low carbon networks will have begun across Merton. New development will also be meeting environmental standards, minimising energy use and costs across Merton. <u>These improvements will play a part in improving overall quality of life in Merton.</u>
SC25	37	Strategic Objective 5	To make Merton a healthier and better place for people to live and work in or visit. We will achieve this by: a. <u>Improving public health and well-being, including working in partnership to deliver health facilities and promote healthy lifestyles;</u> b. Providing a choice and mix of housing to meet the needs of all sectors of the community; c. Enhancing the learning environment to improve access to education, <del>and</del> <u>training and jobs;</u> d. Improving access to nature and leisure facilities including opportunities for sport, <del>and</del> <u>play and relaxation;</u>

No.	Page	Policy/ Paragraph	Suggested Change
			e. Promoting cultural and heritage activities; f. Creating safe, <u>attractive</u> and accessible places.
SC26	41	CS1(f)	Raise awareness of heritage assets including Merton Priory and Wandle Valley Conservation Area, <del>protecting</del> <u>conserving and enhancing</u> archaeological sites and recognising their positive contribution to regeneration and new development.
SC27	43	11.6	<u>Merton's adopted UDP (2003) designates Colliers Wood as an 'Urban Centre'; this is a designation not recognised in national or regional policy.</u> As set out in Chapter 17 'Centres - Policy 7', due to the size and scale of the existing convenience and comparison retail offer and the large quantity of multiple retailers the centre attracts, it is the council's intention to bring Colliers Wood into the London Plan's retail hierarchy by designating the centre as a District Centre. As well as helping to manage growth in this area, designation as a District Centre will contribute to meeting the Colliers Wood and South Wimbledon Area for Intensification (AfI) objectives as set out in the London Plan.
SC28	43	11.8	The adoption of the masterplan will assist in effectively managing both the type and <del>growth</del> <u>size</u> of development that will come forward throughout the lifetime of this plan, ensuring that proposals are commensurate with size and scale of the centre's status within the retail hierarchy.
SC29	43	11.9	This reclassification <u>of Colliers Wood from an "Urban Centre" to a District Centre</u> will support the development of Colliers Wood from an out-of-centre retail park into a well designed district centre attracting a broader range of service retail to complement the existing retail offer in the centre. Colliers Wood centre competes directly with other town centres in the borough, in particular Wimbledon Town Centre. We are keen to ensure that further development in Colliers Wood does not undermine the status of Wimbledon's role as a Major Centre in the London Plan's retail hierarchy and as the main shopping, cultural and evening destination for Merton.
SC30	44	11.13	... Locations that may be sensitive to tall buildings include the historic environments of the Wandle Park, Merton Abbey Mills, Merton Priory and the setting of Listed Buildings where <del>tall buildings should consider</del> the potential impact on the significance and scale of the historic environment and open spaces <u>should be considered</u> . For <del>Locations near to the edge of the town centre boundary should consider</del> the sensitivity of low rise residential neighbourhoods <u>should be considered</u> . Guidance on tall buildings is contained in Chapter 22 'Design - Policy 14'.

No.	Page	Policy/ Paragraph	Suggested Change
SC31	47	11.27	With <del>very</del> <u>good</u> access by public transport and road, there are redevelopment opportunities around South Wimbledon that could reduce congestion and improve the quality of residential neighbourhoods and public realm.
SC32	51	CS2(i)	Ensuring that development <del>protects or</del> <u>conserves and</u> enhances the historic environment, for example, around Cricket Green and Mitcham Common;
SC33	53	12.9	In order to accommodate the significant increase in new housing in Mitcham and the surrounding sub-area, in particular from large key development sites, we will also support the increased provision of community facilities such as education and health facilities to meet the needs of existing and new residents. The up-front coordination and partnership working the council has with relevant bodies on the Infrastructure and Investment Board will help achieve this. The strategic infrastructure needs that have already been identified for delivery in Mitcham, including <u>protecting and improving the healthcare capacity of the borough</u> <del>currently serviced by Wilson Clinic as the proposal for the existing Wilson Hospital to expand and provide a range of services as 'Wilson Local Care Centre', are set out in Chapter Table 27.2 'Infrastructure projects (accurate as of 30 June 2010)'</del> .
SC34	58	CS3	A plan-led approach will increase development capacity and make more efficient use of land by incorporating higher density housing and commercial opportunities; exploiting Morden's excellent public transport links, while <del>protecting</del> <u>conserving and enhancing</u> the character and distinctiveness of the adjacent suburban neighbourhoods.
SC35	58	CS3(f)	<u>Protecting</u> <u>Conserving</u> and enhancing the suburban neighbourhoods and the strong 'green' infrastructure provided by Upper Morden Conservation Area, St Helier Estate, Morden Hall Park and Morden Park and ensure all development respects and enhances local character;
SC36	58	CS3 Morden Town Centre	<i>Insert new bullet:</i> <u>The redevelopment of Morden Road Health Centre to be synchronised with housing developments in Morden;</u>
SC37	59	13.3	A transformational change in the perception of Morden is needed to make it a place where people want to visit rather than pass through. This will be created through <del>reinforcing</del> <u>conserving and enhancing</u> Morden's natural and built heritage, which will play its part alongside high quality contemporary design for new buildings and public spaces. Opportunities for improvements to the streetscape are set out in Merton's Public Realm Strategy as well as the emerging Area Action Plan

No.	Page	Policy/ Paragraph	Suggested Change
			(AAP) for Morden.
SC38	61	13.16	<p>As detailed in Chapter Table 27.2 'Infrastructure projects (accurate as of 30 June 2010)', the Infrastructure Investment Board was set up by the council for the up front coordination to inform the relevant bodies of infrastructure requirements for Merton. The strategic infrastructure needs that have already been identified for delivery in Morden include:</p> <p><del>the development of proposals for further improvements to Morden Hall Park and an upgrade or replacement to Morden Park Pool (replacement of Morden Park Pool includes the proposal to provide a mixed-use leisure facility within Morden Park).</del></p> <ul style="list-style-type: none"> <li>• <u>the redevelopment of Morden Road Health Centre to be synchronised with housing developments in Morden;</u></li> <li>• <u>further improvements to Morden Hall Park; and</u></li> <li>• <u>an upgrade or replacement to Morden Park Pool (replacement of Morden Park Pool includes the proposal to provide a mixed-use leisure facility within Morden Park).</u></li> </ul>
SC39	64	CS4(f)	<p>Restricting further out-of-centre developments at Shannon Corner where these could <del>compete</del> <u>impact on the vitality and viability</u> with nearby town and local centres and generate trips by private transport. Businesses will be encouraged to locate at Shannon Corner where they could benefit from proximity to the strategic road network, not compete with nearby town centres or generate significant private car trips;</p>
SC40	65	14.4	<p>To help support local shops, restaurants and cafés during the day we will ensure that some business function is maintained in the local centre, such as small and medium offices and other activities, and resist the loss of existing employment uses. <u>This is further detailed in Chapter Economic Development - Policy 12.</u> A reliance on the commuter trade is not enough to maintain a variety of quality services.</p>
SC41	66	14.11	<p>In accordance with the London Plan and national guidance and as set out in Chapter 17 'Centres - Policy 7', we will resist the expansion <u>and addition</u> of <del>out-of-centre type uses that would be more appropriately located in town centres.</del> <u>Out-of-centre expansion town centre uses in out of centre locations which</u> could harm the viability and vitality of existing centres. Development will be supported where it meets the demand for logistics and warehousing that can take advantage of its access to the major road network and quick journeys to central London and the south east.</p>
SC42	67	14.14	<p>The suburban neighbourhoods within the sub-area will be <del>protected</del> <u>conserved and enhanced</u> by ensuring</p>

No.	Page	Policy/ Paragraph	Suggested Change
			that new development respects local character and amenity, and where appropriate historic value.
SC43	67	Delivery and Monitoring third bullet	<del>Resisting out-of-centre development</del> <u>additional or expansion of town centre uses</u> at Shannon Corner.
SC44	69	CS5(g)	<del>Protect</del> <u>Conserve and enhance</u> archaeological sites and <del>enhance</del> <u>protect</u> conservation areas in the Wandle Valley and raise awareness of this heritage including Merton Priory and Merton Abbey Mills;
SC45	73	15.16	There are a number of overhead <u>network</u> power cables...
SC46	76	CS6(k)	<del>Maintaining</del> <u>Conserving</u> and enhancing the quality of neighbourhoods within the sub-area through Conservation Area character protection, and by supporting incremental development that respects the character and heritage assets within the area.
SC47	80	16.24	The high quality residential areas to the north and west of the town centre will continue to be <del>protected</del> <u>conserved</u> and enhanced by enforcing conservation area designations, and ensuring that new development responds to the scale, historic value and distinctive character of these neighbourhoods.
SC48	83	CS7	We will support new development in these centres commensurate with their scale and function and where it respects or improves the character and local environment of the area.  A mix of appropriate uses will be encouraged to locate in the centres, including shopping, restaurants, leisure, recreation, entertainment, cultural, <u>community</u> , offices and other uses which contribute to the vitality and viability of centres, in accordance with the sub-area policies set out in the Core Strategy.
SC49	89	17.10	Wimbledon Village, unlike the other local centres in the borough, has few grocery stores but several high end comparison retailers, cafés and restaurants; <u>which is set amongst historic buildings, conservation areas and Wimbledon Common</u> . The priority for Wimbledon Village is to maintain the uniqueness of the centre by supporting development that is commensurate to the scale and quality of the local centre, while not increasing competition with Wimbledon Town Centre.
SC50	89	Insert new para after 17.14	<u>In circumstances, where the Council considers that an independent assessment of the submitted sequential test and impact test is required, the cost should be met by the applicant.</u>
SC51	90	Key Drivers	<ul style="list-style-type: none"> <li><u>Merton's Economic and Employment Land Study (2010)</u></li> </ul>
SC52	92	CS 8(a)	Require proposals for new homes including new build schemes and redevelopment proposals to be well



No.	Page	Policy/ Paragraph	Suggested Change
			designed and located to create socially mixed and sustainable neighbourhoods and <del>not support proposals that result in a net loss of residential units.</del>
SC53	92	CS 8(c)	Aim for the <del>borough-wide London Plan draft replacement plan</del> affordable housing target of 40% <u>which is equivalent to the numerical target of 1,920 affordable homes in Merton for the period 2011- 2026 of which 60% is expected to be social rented and 40% intermediate housing.</u>
SC54	92	CS 8(d)	We will expect an <del>affordable housing target of 40% on individual sites capable of accommodating 10 or more dwellings to be delivered on site. This is equivalent to a numerical target of 1,920 affordable homes in Merton for the period 2011-2026. On sites above 10 units the presumption is that affordable housing will be provided on site in the first instance. Only in exceptional circumstances will the council consider financial contributions in lieu of provision of affordable housing on site and this must be justified</del> <u>the following level of affordable housing units to be provided on individual sites:</u>
SC55	92	CS 8 after (d)	<i>Table 18.1 Affordable housing requirements for Merton - see appendix to this Schedule</i>
SC56	92	CS 8(e)	<del>On sites below 10 units the council will seek an affordable housing equivalent to that provided on site as a financial contribution. For these sites the council seek a target of 20% for sites of 1-9 units.</del>
SC57	93	18.2	We are seeking to reduce inequalities, create socially mixed communities with greater choice and better mix in size, type and location of housing to represent the needs of the whole of Merton's community. The Local Development Framework will assist in supporting Merton's Housing Strategy in this aim. <u>Design requirements for residential development, including minimum space standards, are set out in Chapter 22 'Design - Policy 14'.</u>
SC58	94	18.11 and Table 18.1 (Annex 1)	It is accepted that there will be housing market and housing need fluctuations over the 15 year lifetime of Merton's Core Strategy, such as the current economic uncertainty. <del>Merton's Annual Monitoring Report 2008/09 indicates that the level of affordable housing provision in Merton has fluctuated over the period 2001- 2009, as Merton Affordable Housing Provision 2001- 2009 table demonstrates.</del>
SC59	95	18.13	Whilst it is acknowledged that the current economic uncertainty will have an impact on the level of affordable housing delivery over the next few years, the Core Strategy has to look forward over a 15 year duration. <u>The borough-wide affordable housing target is 40%, which is equivalent to the numerical target of</u>

No.	Page	Policy/ Paragraph	Suggested Change
			<u>1,920 affordable homes in Merton for the period 2011-2026. The numerical target is derived by calculating 40% of the draft London Plan 2009 strategic housing target for Merton (320 homes per annum) rolled forward to cover the 15 year plan period.</u>
SC60	95	18.16	Merton's Affordable Housing Viability Study assessed a range of different affordable housing target requirements on schemes of 1-9 units and their impacts on viability. The Study supports the introduction of an affordable housing requirement concerning schemes below 10 units as being viable. <u>For sites below 1-9 units, what is meant by an affordable housing equivalent to that provided on site includes the costs of land, building and servicing. This approach and the formula to assist with calculations is set out in Merton's Affordable Housing Viability Study (2010).</u>
SC61	95	18.18	Government initiatives could help to enable delivery of affordable housing in Merton. <u>For the period 2008/9 – 2010/11 the HCA have allocated funding in the region of £37m of £37,904,555m for 426 445 affordable housing units in Merton.</u>
SC62	96	18.20	Where a developer <del>contends</del> <u>contests</u> that it would not be appropriate to provide affordable housing on a <del>particular</del> <u>-site or wishes to deviate from the affordable housing requirements set out in the policy,</u> the onus would lie with the developer to demonstrate the maximum amount of affordable housing that could be achieved on the site viably, through the submission of a residual land value viability assessment. Where it is deemed appropriate, the council will subject proposals and applicants' submitted residual land value viability assessment(s) to independent examination....
SC63	96	18.23	Merton's SHMA which is in progress will feed into the South West London Housing Market Assessment <del>currently underway</del> , which Merton's LDF will have regard to once completed.
SC64	97	18.26	This will mean helping to deliver a variety of sizes, types and tenures of homes in Merton and ensuring the design of these homes is accessible and inclusive to cater for all sections of the population, including Lifetime homes, wheelchair accessible and supported care accommodation. <del>As outlined in</del> Chapter 22 'Design - Policy 14' <u>encourages all residential development to comply with the most appropriate minimum space standards.</u>
SC65	98	CS8 Delivery and Monitoring	We will work with Registered Social Landlords, developers and the Homes and Communities Agency in the delivery of a mix of housing types and tenures, to meet the needs and demand of all sectors of the community. This delivery will be monitored via the

No.	Page	Policy/ Paragraph	Suggested Change
			<p>Annual Monitoring Report.</p> <p><u>For residential schemes of 1-9 units we will use the formulaic approach set out in Merton's Affordable Housing Viability Study (2010) for calculating the affordable housing equivalent to that provided on-site as a financial contribution.</u></p> <p><u>Where a developer contests the affordable housing requirements set out in policy, we will use viability models, such as the GLA Affordable Housing Toolkit, to assess submitted residual land value viability appraisals.</u></p>
SC66	99	CS 9(a)	Support the provision of well designed housing located to create socially mixed and sustainable neighbourhoods, including the redevelopment of poor quality existing housing and not support proposals that result in a net loss of residential units <u>or net loss of affordable housing units.</u>
SC67	99	CS 9(b)	<i>Update sub area indicative figures to reflect updated housing trajectory.</i>
SC68	100	18.36	Since then the draft London Plan (2009) has been published...
SC69	101	18.40	It is expected that the majority of higher density new homes and associated infrastructure and social facilities will be located in places with good public transport access. <u>As detailed in Policy CS 11 'Infrastructure' Policy CS 13 'Open space, nature conservation, leisure and culture' and Policy CS 19 'Public Transport' the provision of infrastructure associated with development proposals is supported by the council.</u>
SC70	101	18.42	...The aim is to <del>improve</del> <u>increase</u> the number of people using the town centre...
SC71	103	Picture 18.1	<i>Update housing trajectory</i>
SC72	104	18.46	Raynes Park and its surrounding area is anticipated to contribute a relatively smaller quantum of additional housing growth mainly concentrated around its local centre. Although the centre has a high level of public transport accessibility there is a desire to <del>protect</del> <u>conserve and enhance</u> the valued distinctive local character and scale of Raynes Park as set out in Chapter 14 'Raynes Park Sub-Area - Policy 4' . In addition, parts of Raynes Park Local Centre and Beverley Way / Shannon Corner are located within the functional floodplain and <u>development</u> will therefore need to comply with Environment Agency advice and Chapter 24 'Flood Risk Management - Policy 16'. Key sites for housing in Raynes Park include Raynes Park Car Park, the former Atkinson Morley Hospital site and Lessa Sports Ground.

No.	Page	Policy/ Paragraph	Suggested Change
SC73	104	18.47	Merton's <u>Economic and Employment Land Study...</u>
SC74	105	Key Drivers	<ul style="list-style-type: none"> <li>• <u>Economic and Employment Land Study (2010)</u></li> </ul>
SC75	109	CS 11(a)	<del>Expecting</del> <u>Requiring</u> new development to provide for any necessary infrastructure, <del>on-site or as part of a planning contribution;</del>
SC76	109	CS 11(d)	Supporting provision of improved health services as <del>prioritised</del> , <u>in particular those identified</u> by Sutton and Merton Primary Care Trust <u>and any successor commissioners, including the use of Health Impact Assessments (HIA's) with major planning applications;</u>
SC77	109	CS 11(f)	<del>Resisting the net loss of social and community facilities unless it can be demonstrated that there is no future local particularly where a need has been identified.</del>
SC78	109	CS 11 insert bullet after (f)	<u>(g) Supporting the provision of emergency services as promoted by the Metropolitan Polices Asset Management Plan and other emergency service providers.</u>
SC79	110	19.5	A key <del>theme</del> <u>aim</u> of the Community Plan is to encourage healthier communities by improving health outcomes and reducing health inequalities. Infrastructure needs to be in place to support well being, encourage the increase in sport and leisure <u>facilities</u> and support the provision of health <u>services</u> and housing for our community, particularly the vulnerable members of the community. <u>In line with the London Plan (2008) and the emerging draft replacement plan policies we will require major development to provide details on health impacts of development as part of the applications process.</u>
SC80	110	Insert para after 19.5	<u>All policies in the Core Strategy play a part in protecting health and promoting healthier lifestyles but in particular this is demonstrated in Chapter 18 'Housing - Policies 8-10', Chapter 21 'Open Space, Nature Conservation, Leisure and Culture - Policy 13', Chapter 22 'Design - Policy 14', Chapter 23 'Climate Change - Policy 15', Chapter 24 'Flood Risk Management - Policy 16', Chapter 25 'Waste Management - Policy 17' and Chapter 26 'Transport - Policies 18-20'.</u>
SC81	111	19.8	Sutton and Merton PCT have identified that joint working with Kingston, Sutton and Croydon could ensure coverage near the borough's boundaries but for Merton priority need <u>needs are identified in Chapter 27 Table 27.2 'Infrastructure projects (accurate as of 27 October 2010)'</u> . <del>is in the following locations:</del> <ul style="list-style-type: none"> <li>• <del>In Colliers Wood town centre to consolidate two small inadequate premises into one new premises to support the population growth;</del></li> <li>• <del>The introduction of a surgery at the Former Rowan High School, Mitcham to support development and</del></li> </ul>

No.	Page	Policy/ Paragraph	Suggested Change
			<p>improve access;</p> <ul style="list-style-type: none"> <li>• <del>The introduction of a surgery at Mortimer Road, Mitcham to improve access and support development;</del></li> <li>• <del>The improvement of healthcare facilities in Raynes Park and Princes Road area of Wimbledon.</del></li> </ul>
SC82	111	19.10	<p>The LDF will continue to support new and improved childcare and educational facilities in response to the increasing birth rate. The borough is experiencing the greatest demand for primary school places in decades. <u>There has been an increase in the birth rate by over 800 - just over 30% in the 6-years from 2003 to 2009 from just over 2,600 to over 3,400 children. Primary school expansion has already occurred and additional expansion may be required to meet demand after 2013/2014</u> It is anticipated that there will be an additional 638 reception school places required by 2011/12 (from birth year 06/07) representing nearly 25% increase over a 5-year period.</p>
SC83	111	19.11	<p>The council has a duty to provide access to a local primary school place for all its residents who want one. We must plan for school expansion to meet forecast future need and work with education services to identify suitable sites, where necessary, <del>in particular the need for a primary school in north Wimbledon as set out in 27 'Delivery and Implementation' and identified in the Education Expansion Strategy (2010).</del></p>
SC84	111	New para after 19.11	<p><u>There may be a need for further expansion of primary schools in the borough beyond 2013 if birth rates continue to rise beyond 2013 and the need for new school [footnote] places is equally spread across the borough. After the school expansion programme 2008-2012 finishes, it is unlikely that existing schools in the north Wimbledon area will be able to expand any further due to their site constraints. In this event the Council would need to make provision for a suitable site in this part of the borough and will conduct a site search, focusing on previously developed land, including the Council's own assets, as a priority.</u></p> <p><i>Footnote:</i>  <u>Meant in this context as only schools to meet the need for statutory free-entry places to reception, primary and secondary schools.</u></p>
SC85	112	19.13	<p>Pupil numbers can fluctuate as parents do not have to send their children to the nearest schools, but we must consider that the primary school demand will shift towards secondary and tertiary education as the flow of additional children moves through the education system. <u>In particular, the pupil place projections indicate substantial expansion of the secondary school</u></p>

No.	Page	Policy/ Paragraph	Suggested Change
			<u>estate will be required from 2015.</u>
SC86	112	19.14	During the lifespan of the Core Strategy we will therefore need to consider possible additional demand for all types of education provision. <del>The Government's "Building Schools for the Future" (BSF) initiative provides investment for new and improved secondary school buildings.</del> We will work closely with the Department for Children Schools and Families to take into account the rapid increase in the school population which is projected to impact on the secondary school phase from 2015 and seek developer contributions towards new provision where appropriate. <u>In accordance with the council's health and sustainability agendas, provision of local schools will enable greater accessibility, improve opportunity for walking or cycling to school and could lead to enhancement of other local open space through planning obligations.</u>
SC87	112	19.17	We currently have <del>eight</del> <u>nine</u> community centres and <del>two</del> community resources, the majority are located in the east of the borough. In addition we have eight libraries, a heritage centre and several <u>centres of</u> cultural interests including Merton Abbey and Ravensbury Mill, Windmill museum, Wandle industrial museum and Wimbledon museum of local history.
SC88	112	19.18	We are moving towards co-location, <u>i.e.</u> a mix of community uses/resources at one location, to encourage viable use of space and integrated provision to meet the needs of all sectors of our community ( <del>for example, INV 5: Improved community facilities in Chapter 19 'Infrastructure - Policy 11'</del> ). Community premises include meeting halls, places of worship, social clubs and schools.
SC89	112	19.19	The government's Extended Schools initiative involves extending opening hours of schools to offer community facilities on site, not just out-of-hours childcare but also for example the use of sports halls, swimming pools, computers, music, arts and crafts and provision of adult classes. <del>Similarly, the Building Schools for the Future (BSF) initiative provides investment for new and improved school buildings which will have community benefits.</del>
SC90	113	19.22	<b>Emergency Services:</b> The Metropolitan Police service proposes that their future estate within Merton will include a new patrol base. As set out in London wide guidance, Property for Policing (2007), this will accommodate the majority of operational police officers and resources for the borough in one main building, We support the Metropolitan Police with the proposed Metropolitan Police Estate within the borough, particularly the patrol base site in South Wimbledon and <u>community policing</u>

No.	Page	Policy/ Paragraph	Suggested Change
			<del>facilities safer neighbourhood bases.</del>
SC91	113	19.24	It is not anticipated that there will be any significant infrastructure obstacles <u>for development</u> in terms of water, drainage and sewage provision <del>for development</del> over the Core Strategy period. Thames Water are reasonably confident, based on the minimum housing target for the borough up to 2026 that they can meet Merton's water resource and sewerage treatment needs.
SC92	115	Key Drivers	PPS3:Housing (2006 <u>10</u> )
SC93	117	Fig 20.1	Update Figure 20.1: Economic Development map and to ensure that term Strategic Industrial Location and Locally Significant Industrial Area is consistent throughout this Chapter. Please refer to proposed changes in the Economic Development Chapter.
SC94	118	CS 12(a)	We will support the development of a diverse local economic base in Merton by encouraging the increased provision of the overall number and range of jobs in Merton, particularly in the commercial and business sectors (including the provision of business, leisure, retail, creative, cultural and 'green jobs'). <u>(Please refer to the full definition of employment uses as defined in PPS4: Planning for Sustainable Economic Growth [2009])</u>
SC95	122	20.13	In common with all south London boroughs, Merton is identified as having low levels of industrial land relative to demand and should adopt a more restrictive approach to the transfer of designated industrial sites to non-employment uses. The "restrictive transfer" approach is supported by Merton's <u>Economic and Employment Land Study</u> .
SC96	122	20.16	<u>Currently</u> Hhealth care, education and the public sector are major employers of our residents within the borough and beyond its boundaries (for example at St George's and St Helier hospitals). Together with Chapter 19 'Infrastructure - Policy 11' we recognise the economic potential of healthcare, education and community uses (D1 and C2) by facilitating such development <u>on scattered employment sites</u> and resisting the net loss of viable facilities.
SC97		Throughout document	<i>Standardise terms 'Strategic Industrial Locations' (SIL) and 'Locally Significant Industrial Sites' (LSIS) throughout document</i>
SC98	123	20.22	...Such developments increase car traffic, can interfere with neighbouring occupiers, <del>and would increase competition and could reduce impact negatively on</del> the viability and vitality of Merton's established centres. This is in accordance with Chapter 17 'Centres - Policy 7'.

No.	Page	Policy/ Paragraph	Suggested Change
SC99	123	Key Drivers	<ul style="list-style-type: none"> <li>• <u>Merton's Economic and Employment Land Study (2010)</u></li> </ul>
SC100	124	Key Drivers	<ul style="list-style-type: none"> <li>• <u>London Industrial Land Release Benchmarks (GLA 2007 and 2010)</u></li> </ul>
SC101	124	CS 12 Delivery and Monitoring	<p>As of 2010, there is approximately 158 hectares dedicated to industrial and warehousing development, including:</p> <ul style="list-style-type: none"> <li>• <u>Strategic Industrial Locations: Durnsford Road B (North Wimbledon Part), South Wimbledon Business Area (also known as Morden Road Factory Estate), and Prince Georges Road, Willow Lane, Hallowfield Way (Benedicts Warf), Burlington Road (Beverley Way) and Malden Way (Beverly Way) Burlington Way.</u></li> <li>• <u>Locally Significant Industrial Sites Locations: Bushey Road, Dundonald Road, Streatham Road, Durnsford Road A, Gap Road, Dundonald Road, Streatham Road, Nelson Trading Estate, and Garth Road and Raynes Park (Rainbow Industrial Estate).</u></li> <li>• <u>Scattered employment sites: located throughout the Borough.</u></li> </ul>
SC102	126- 128	CS 13	<i>Retain A. to I. references and number sub entries, so that g (i) and g (ii) will become g (1), g (2) etc</i>
SC103	127	CS 13(g) vii	Expect <del>significant</del> new development within the area of the Wandle Valley Regional Park, <u>where feasible and appropriate</u> , to incorporate physical, visual and landscape connections that will encourage pedestrian and cycle accessibility and enhance the attractiveness of the park;
SC104	127	CS 13(h)	<u>Based on assessment of need and capacity, opportunities in culture, sport, recreation and play will be promoted by:...</u>
SC105	127	CS 13(h) iii	Promoting healthy lifestyles to encourage physical education and well-being through the use of our leisure centres, schools, open spaces, playing pitches, recreation space and engagement in the arts through the use of our schools and colleges, open spaces, theatres and libraries. <u>We will also encourage exercise in daily routines such as when travelling to work or school;</u>
SC106	129	21.5	The value of front and back gardens in terms of biodiversity, climate change and flood mitigation is recognised. <u>In line with the General Permitted Development Order (GDPO 2008), paving over of front gardens must be carried out using permeable or semi-permeable materials to improve surface water run-off and to reduce the impact of flooding and pollution of watercourses. The GDPO states that you do not need to apply for planning permission to pave over front</u>



No.	Page	Policy/ Paragraph	Suggested Change
			<p><u>gardens unless the surface to be covered is more than five square metres and the materials being laid are traditional, impermeable materials that do not provide for the water to run to a permeable area.</u> We will therefore encourage the use of permeable surfaces within gardens which are more attractive and better for the environment, in accordance with Chapter 24 'Flood Risk Management - Policy 16'.</p>
SC107	129	21.6	<p>Private back gardens provide a significant resource for biodiversity and amenity space and contribute to mitigating against the impacts of climate change and flood risk. <del>Proposals for new dwellings in back gardens must be justified against the criteria set out in the above policy and in the London Plan. PPS3 Housing (2010) excludes private residential gardens from the definition of previously developed land. PPS3 states that there is no presumption that land that is previously developed is necessarily suitable for housing development nor that the whole curtilage should be developed.</del></p>
SC108	130	Figure 21.1	<p><i>Replace map to make the key clearer</i></p>
SC109	133	21.16	<p>We work with many partners in the delivery of services; this is identified in Chapter 27 'Delivery and Implementation'. In particular, the extended school initiative is about making the most of the opportunity a school site can offer and enabling sharing of facilities and space. It involves extending the hours schools are open to provide childcare and often this includes sports, local events and leisure activities for the community too. We will work with the PCT (<u>and successor commissioners</u>) and our schools to encourage healthy <del>provision out of</del> <u>provision</u> during school hours <u>provision</u> to offer sports and clubs to the community. The extended school initiative is also covered under chapter 19 'Infrastructure - Policy 11'.</p>
SC110	133	21.17	<p>The importance of providing for children's play is emphasised in the Mayor's SPG "Providing for Children and Young People's Play and Informal Recreation" (2008). Play is an important aspect in our lives, not only in terms of health but also encouraging happiness, social cohesion and development. The council is supporting play provision by enhancing <del>22</del> <u>14</u> play facilities as part of its Play Pathfinder project and creating a new adventure playground at the Intergenerational Centre in Eastfields, Mitcham.</p>
SC112	138	CS13 Delivery and Monitoring	<p>Protection of <u>front and back</u> gardens will be maintained through the development control process.</p>
SC113	138	CS13 Delivery and	<p>We will also work with Sutton and Merton Primary Care Trust <u>and successor commissioners</u> and the</p>

No.	Page	Policy/ Paragraph	Suggested Change
		Monitoring	Department for Children Schools and Families to promote healthy lifestyles.
SC114	140	CS 14a.	<del>Protecting</del> <u>Conserving</u> and enhancing Merton's <u>heritage assets and wider</u> historic environment particularly the valued centres, suburban neighbourhoods, industrial heritage and iconic green spaces, through conservation areas, statutory and locally listed buildings, scheduled ancient monuments, historic parks and gardens and archaeological sites <u>and other non-designated heritage assets</u> ;
SC115	140	CS 14b. iv.	responds to <u>heritage assets and the wider</u> historic environment to enhance local character and distinctiveness
SC116	140-141	CS 14c.	Protecting the valued and distinctive suburban character of the borough by resisting the development of tall buildings where they will have a detrimental impact on this character. Tall buildings may therefore only be appropriate in the town centres of Colliers Wood, Morden and Wimbledon, where consistent with the tall buildings guidance in the sub-area policies, where of exceptional design and architectural quality and <u>where they do not cause harm to the townscape and significance of heritage assets and the wider</u> <del>where justified in terms of their impact on the townscape and</del> historic environment, and the <u>where they will bring</u> benefits towards regeneration and public realm. Outside of these locations tall buildings are unlikely to be appropriate.
SC117	141	CS 14d. (b)	<del>by requiring the conversion of existing single dwellings into two or more smaller units of accommodation to</del> <u>by requiring existing single dwellings that are converted into two or more smaller units of accommodation to:</u>
SC118	141	CS 14d. i.	incorporate the re-provision of at least one family <u>sized unit where resulting in the loss of an existing family sized unit</u> ;
SC119	141	CS 14d. iii.	<del>not result in a net loss of units;</del>
SC120	142	22.4	Merton's historic environment is an important element of the character, cultural heritage and identity of the borough. In order to protect this, we have designated 28 Conservation Areas, as well as given protection to its existing open spaces and wildlife habitats. This is supplemented by a list of <del>local</del> buildings of <u>with local</u> historic, architectural or townscape value, a programme of character appraisals and management plans for the Conservation Areas. Statutorily listed buildings and other heritage sites, such as historic parks and gardens and scheduled ancient monuments help complete the key elements of the historic character of Merton.
SC121	142	22.6	In line with PPS5, Merton's heritage assets <u>and the</u>

No.	Page	Policy/ Paragraph	Suggested Change
			<u>wider historic environment</u> should be used to make a positive contribution and inspire new development of imaginative and high quality design, forming a central part of future development and regeneration in the borough.
SC122	145	22.12	<del>"grid-iron"</del> <u>"gridiron"</u> terraces
SC123	147	22.14	...Beyond heritage assets, <del>unnecessary demolition of Merton's existing building stock will also be discouraged</del> <u>opportunities for refurbishment rather than demolition and replacement will be encouraged as a more sustainable option.</u>
SC124	147	New para after 22.15	<u>Good design has a role in offsetting negative environmental and health impacts and to create healthier communities. Health Impact Assessments of major developments can help promote good design by addressing health impacts</u>
SC125	147	22.18	National guidance on tall buildings is produced by English Heritage and CABE. The draft London Plan defines tall buildings as those that are <u>substantially noticeably</u> taller than their surroundings, <del>have</del> <u>cause</u> a significant <u>impact change</u> on the skyline or are larger than the threshold size for the referral of planning applications to the Mayor.
SC126	149	22.26	The conversion of existing single dwellings into two or more smaller units typically involves the intensification of the boroughs suburban housing stock, resulting in the loss of larger units. Given the identified need for 3 bedroom units and the historical provision of smaller units, we are seeking to retain the existing stock of family sized units in Merton. Applications for conversion of existing <u>family sized</u> single dwellings into two or more smaller units must include the re-provision of at least one <u>family sized</u> unit. The draft London Plan defines a family unit as having three or more bedrooms.
SC127	149	22.30	We will therefore resist the conversion of dwellings where it would result in these detrimental impacts on the suburban characteristics of the streetscape. <u>Reversion of previously converted properties back into a dwelling house may be acceptable under certain circumstances.</u>
SC128	149	22.31	Merton's Public Realm Strategy (2009) outlines local guidance for the design of new public spaces and improvements to the existing public realm. The strategy's vision seeks to unify Merton's public realm <u>through simple uncluttered design to create an environment of real quality and to</u> rediscover the borough's green character, <del>and simplify its design to create an environment of real quality.</del> The principles of the strategy are the:

No.	Page	Policy/ Paragraph	Suggested Change
SC129	150	Key Drivers	<ul style="list-style-type: none"> <li>Merton Street Scene Design Guide (2008)</li> </ul>
SC130	151	CS14 Delivery and Monitoring	We will work with strategic partners such as English Heritage, The National Trust and local amenity societies and organisations to <del>protect</del> <u>conserve</u> and enhance Merton's historic environment. This may include identifying additional areas of significance within the borough. The council's Design Review Panel and the Design Champion will advise on development proposals.
SC131	154	23.9	In accordance with Chapter 22 'Design - Policy 14' the retention, re-use and adaptation of our existing building stock including the historic environment should be the starting point, as a means of achieving sustainable development. Where development is being carried out, the existing building fabric and materials should be re-used wherever possible. <del>Unnecessary demolition of existing buildings is discouraged.</del> <u>Opportunities for refurbishment rather than demolition and replacements will be encouraged as a more sustainable option.</u>
SC132	156	23.26	Development in Merton will also be expected to mitigate against the impacts of climate change for the future users of that development. <del>Applying</del> <u>We will apply</u> London Plan policies to address overheating and cooling, urban greening (such as tree planting, green walls, roofs and landscaping).
SC133	156	23.29	All new development will be expected to achieve as high a level of carbon reduction possible through best practice in sustainable design, construction techniques and site wide energy solutions, subject to viability. <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>
SC134	160	New para after 24.8	<u>The regions shown on the map Figure 24.1 'Areas at risk from flooding in Merton' are indicative only as data is reviewed annually and is subject to change. For site development purposes it is recommended that up to date flood risk information is checked via the Environment Agency website at <a href="http://www.environment-agency.gov.uk/">http://www.environment-agency.gov.uk/</a>.</u>
SC135	161	Figure 24.1	<i>Update map</i>
SC136	162	Key Drivers	<ul style="list-style-type: none"> <li>EU-WFD <u>European Union Water Framework Directive</u> (2003)</li> </ul>
SC137	163	CS 17 d.	We will increase <del>household</del> recycling rates and address waste as a resource, looking to disposal as the last option in line with the waste hierarchy. To support recycling, the council will require integrated, well-

No.	Page	Policy/ Paragraph	Suggested Change
			designed <u>waste storage facilities that will include recycling facilities to be incorporated into</u> for all new developments where appropriate.
SC138	166	CS 18 b.	Supporting schemes and infrastructure that will <del>encourage community cooperation</del> <u>reduce conflict between pedestrians, and cyclists and other transport modes;</u>
SC139	166	CS 18 e.	Partnership working to deliver high quality links or <u>the</u> enhancement of existing pedestrian and cycle networks, <del>specifically including the</del> Capital Ring, Wandle Trail, Wandle Beverly Brook Link, <u>the Greenways Network</u> , the Cycle Super Highway, and the London Cycle Network;
SC140	166	CS 18 f.	Requiring the submission of Travel Plans to accompany development proposals which <del>will</del> meet or exceed the <del>indicative</del> Department for Transport's indicative thresholds for <del>Transport a</del> Assessment <del>and</del> or the thresholds in relevant Transport for London guidance;
SC141	166	CS 18 g.	Encouraging design that provides, attractive, safe, <u>covered and secure</u> cycle storage, <u>cycle</u> parking and other facilities (such as showers, bike cages and lockers).
SC142	167	26.4	The Cycle Super Highway, <u>the Greenways Network</u> and the London Cycle Network (LCN+) routes go through the borough, and these provide a strategic cycle network. There are also numerous proposed borough cycle routes that feed into the strategic cycle network, which together will provide a comprehensive cycle network within Merton.
SC143	167	26.5	The network of borough pedestrian routes and leisure routes links most of the centres in Merton. The 'Capital Ring' walking route crosses the north west of the borough, through Wimbledon Common and Wimbledon Park. The Capital Ring encircles London and is one of the Mayor of London's key Strategic Walking Network routes. The Wandle Trail follows the route of the River Wandle, passing through Merton as well as Wandsworth, Sutton and Croydon, and caters for both cyclists and pedestrians. <u>The Greenways Network is a coordinated city-wide network of good quality walking and cycling routes; the project is managed by Transport for London, Sustrans and other partners.</u>
SC144	167	26.7	The Department of <del>for</del> Transport's (DfT) Walking and Cycling: An Action Plan centres on providing improvements to the environment and facilities for

No.	Page	Policy/ Paragraph	Suggested Change
			walkers and cyclists with targeted information about travel choices, health benefits and recreational opportunities. It is the government's key plan in promoting active transport. We will require <del>Transport Travel Plans to</del> <u>which</u> meet or exceed the <del>indicative DfT's Department for Transport's indicative</del> thresholds for transport assessment <del>or and the thresholds in</del> <u>relevant</u> Transport for London guidance.
SC155	171	CS 19 f.	Supporting town centre development that encourages <del>inventive</del> <u>innovative</u> ideas to improve the public realm;
SC156	171	CS 19 i.	Supporting development which improves <u>transport</u> interchanges <del>of public transport</del> and transport reliability.
SC157	172	26.11	PPG13 (Transport), <u>the</u> Mayor's Transport Strategy, and the London Plan emphasise the <del>necessity</del> <u>need</u> for transport and land use changes to be integrated and developed <u>simultaneously</u> <del>at the same time</del> .
SC158	177	CS 20 b.	Prioritising <u>for</u> people with <u>restricted</u> mobility difficulties and protecting vulnerable road users;
SC159	177	CS 20 c.	Supporting development that includes car club bays <u>and electric vehicle charging points</u> ;
SC160	177	CS 20 d.	<del>d. Implementing new controlled parking zones, or expanding existing ones where this is deemed to positively reduce trip generation, road safety and protect existing residential amenity;</del>
SC161	177	CS 20 g.	Considering new or expanding existing Controlled Parking Zones (CPZ) where it is deemed to <del>positively impact trip generation, road safety</del> <u>reduce trip generation, promote road safety</u> and protect existing residential amenity;
SC162	177	CS 20 h.	<del>Considering permit free agreements</del> <u>Supporting permit-free developments</u> in areas within CPZ's benefiting from good access to public transport (PTAL 4 - 6), with good access to facilities and services and/or in a town centre location. Permit free agreements may apply to proposals with or without off-street parking;
SC163	177	CS 20 k.	Requiring developments to incorporate <u>safe</u> access to and from the public highway as well as on-site parking and manoeuvring for emergency vehicles, refuse storage and collection, and for service and delivery vehicles;
SC164	179	26.30	<del>Regional guidance also supports the use of</del> <u>Merton</u> supports the regional guidance to use travel demand

No.	Page	Policy/ Paragraph	Suggested Change
			management initiatives including car clubs, car-sharing schemes, and electric charging points.
SC165	179	26.32	The needs of the mobility impaired, including the disabled and the elderly, <del>must</del> <u>will</u> be provided <u>for</u> in accordance with the Disability Discrimination Act, <u>for example in Merton's public highway schemes and through the development management process.</u>
SC166	180	26.33	<i>Move para to after 26.29</i> <u>The above measures should be balanced with</u> <del>A</del> <u>adequate provision must be made</u> for servicing, loading and unloading and turning facilities in accordance with the standards set by the Freight Transport Association.
SC167	180	26.34	The <u>council's</u> aim is to...
SC168	180	Key Drivers	<ul style="list-style-type: none"> <li><u>Merton's Economic and Employment Land Study (2010)</u></li> </ul>
SC169	181	27.3	We are working with other agencies <del>and processes</del> to ensure priorities are aligned for effective resource and management and coordination, some of which extend beyond the borough's boundaries <del>in light of sub-regional priorities</del> . This assists with clearly identifying mechanisms and commitment where the actions required to implement policy are outside the direct control of the council, but <u>have</u> a reasonable prospect of delivery <del>is identified</del> .
SC170	181	27.5	Merton is part of a number of key <del>strategie</del> partnerships including:
SC171	181	27.5 (subsection 1)	Local Strategic Partnership (LSP), <del>T</del> <u>the</u> Merton Partnership, to oversee the preparation of the Community Plan (Sustainable Community Strategy) and the Neighbourhood Renewal Strategy.
SC172	181	27.5 (subsection 3)	With south London councils of Croydon, Kingston-upon-Thames and Sutton to produce a Joint Waste <u>Development Plan Document (South London Waste Plan)</u> .
SC173	182	27.5 (subsection 5)	Town Centre Partnerships (including the police, transport providers, <u>Merton Chamber of Commerce</u> , local businesses) in Mitcham, Morden, Wimbledon, Colliers Wood and Raynes Park.
SC174	182	27.6	The government have updated guidance, Planning Together, which recommends using the Local Strategic Partnership to <del>align</del> <u>help deliver</u> the Local Development Framework.
SC175	186	Para 27.11	Central Government's <del>Building Schools for the Future (BSF)</del> <u>is the biggest ever school buildings investment programme, which aims to rebuild or renew nearly</u>

No.	Page	Policy/ Paragraph	Suggested Change
			<p><del>every secondary school in England. All authorities are to be included in BSF over a period of 15 years. Merton hopes to officially enter the programme sometime in 2010 for works to start 2014 or 2015. The programme will need to take into account funding for schools is provided to meet demographic pressures and to address maintenance needs. The funding provision will need to be allocated locally in the most cost-effective and targeted way. We are planning for the rapid increase in the school population which is impacting on primary school provision now and projected to impact on the secondary school phase 2015. We will continue implement the government's Extended Schools services where schools open up their facilities out of hours.</del></p>
SC176	187	Para 27.15	<p>As a functional body of the Greater London Authority, the LDS <del>have</del> <u>has</u> a key role to play in helping to deliver the Mayor's vision and priorities for London. <u>In early 2010, the Mayor, London Assembly and London Boroughs submitted a package of joint proposals of joint proposals to fold the LDA into the Greater London Authority (GLA). The Coalition Government agreed to its abolition under the Public Reform Proposals for Change. Some activities may cease or be transferred elsewhere reflecting the need for a greater policy lead nationally. Discussions on this continue with the GLA.</u></p>
SC177	187	Para 27.16	<p>The LDS's <del>draft Investment Strategy 2009-13-2010/13</del> <u>sets the strategic direction the LDA (GLA) will take to invest, innovate and influences London's economic development over the next three years. In addition to providing funding, the LDA (GLA) provide a role in co-ordinating economic development activity, leveraging resources and leadership.</u></p>
SC177	188	Para 27.23	<p>The <u>council and its partners have agreed Merton's second Local Area Agreement (LAA) with central government, to run from 2008-2011.</u></p>
SC178	188	Para 27.24	<p><u>The Homes and Community Agency (HCA) is the national housing and regeneration agency for England, providing funding for affordable housing and bringing land back into productive use. The HCA is a non-departmental public body which works along with the Tenant Services Authority (the regulatory body for Registered Providers of social housing (including former Registered Social Landlords). For the period 2008/09 - 2010/11 the HCA have allocated funding <del>in</del> the region of £37m for 445 affordable units in Merton. of 337,904,555m for 426 affordable units in Merton.</u></p>
SC179	188	27.25	<p><u>INTERREG IIIC is an EU-funded programme that helps Europe's regions from partnerships to work together on common projects.</u></p>
SC180	188	Insert new	<p><u>We are also exploring how to make better use of our</u></p>



No.	Page	Policy/ Paragraph	Suggested Change
		paragraphs after 27.25	<u>assets to deliver services or to generate funding to improve services. This will also include shared use of space.</u>
SC181	188	27.27	<del>On 6<sup>th</sup> April 2010 the government has announced the introduction of a new statutory planning charge introduced a new local levy that authorities can choose to introduce to help fund infrastructure in their area, the <b>Community Infrastructure Levy (CIL)</b> based on an estimated assessment of the infrastructure requirements arising out of development. Due to come into effect in 2010, authorities. CIL will help pay for the infrastructure required to serve new development. The levy should be based on evidence of the infrastructure needed and balanced against viability. CIL is not intended to be the main source of finance for infrastructure. Authorities are were expected to advance their infrastructure planning in preparation for CIL, to ensure there is clear evidence about planned infrastructure, it's costs, timing and likely source of funding. On this basis the Core Strategy includes a schedule for infrastructure projects delivery. The Coalition Government stated on 1 July "The Government are currently considering the future of the Community Infrastructure Levy (CIL). We will make a public announcement shortly".</del>
SC182	188	27.28	Local Authorities are expected to continue to advance their infrastructure planning in preparation for <del>the new CIL, in order any future levy proposals,</del> to ensure that there is clear evidence about planned infrastructure, its cost, timing and likely sources of funding.
SC183	189	27.28	<del>While CIL may replace some existing planning obligations, section 106 agreements will still be required for the provision of affordable housing.</del>
SC184	189	27.30	In line with PPS12, we carried out an <b>Infrastructure Needs Assessment</b> study in December 2008, which included <del>the following infrastructure areas an</del> <u>assessment of the following:</u>
SC185	189	27.31	The study explored the proposed additional housing provision and predicted population growth over the period of the Core Strategy. <del>Although the projected population growth is minimal w</del> <u>We must ensure there is the infrastructure necessary to support the new development delivered at the right time and addressing existing shortfalls in provision. The infrastructure and Investment Board is helping to identify and co-ordinate proposals.</u>
SC186	189	27.31	The indicators and targets associated with each policy <u>are set out in Chapter 28 'Monitoring', 28.1 'Monitoring Framework' which provides a basis for monitoring.</u> PPS12 advises that Core Strategies are

No.	Page	Policy/ Paragraph	Suggested Change
			expected to show how the vision, objectives and strategy for the area will be delivered and by whom, and when. Deliverability is one of the key aspects to <del>for</del> a sound strategy.
SC187	189	27.34 (Colliers Wood subsection)	A masterplan will be prepared in partnership with the GLA, the Environment Agency, landowners and developers, setting out how the proposed designation of Colliers Wood as a district centre will be implemented.
SC188	190	27.34 (Mitcham subsection)	<del>The detailed approach will be enhanced in the Development Control DPD.</del> Specific economic interventions considered by the council for Mitcham and East Merton are set out in Merton's Economic Development Strategy (March 2010). Other softer measures aimed at contributing towards reducing inequalities are <del>expected to be</del> delivered through the implementation of the Community Plan and the Neighbourhood Renewal Strategy.
SC189	190	27.34 (Morden subsection)	<del>Preparation of a</del> An Area Action Plan is proposed to deliver the vision for regenerating Morden through intensified development in and around the town centre. Partnership working will continue to progress regeneration.
SC190	190	27.34 (Raynes Park subsection)	<del>Focus on short and medium term improvements, particularly public realm enhancement</del> There has recently been significant investment in Raynes Park town centre to improve the public realm following the Raynes Park Enhancement Plan. Further policy development will be considered in the long-term if monitoring indicates intervention necessary, such as planning briefs for key sites.
SC191	190	27.34 (Wandle Valley subsection)	We will continue to build on the strong partnerships that already exist, particularly in terms of the <u>Green Grid</u> and creation of the Wandle Valley Regional Park and in exploring viable and appropriate measures that contribute to minimising flood risk in the area to encourage business and regeneration in the Wandle Valley.
SC192	190	27.34 (Wimbledon subsection)	In addition the focus will be on town centre management and promoting the Wimbledon 'brand' in conjunction with the Economic Development Strategy (March 2010) to encourage investment and the development of key sites.
SC193	190	27.35	In accordance with Chapter 22 'Design – Policy 14', we will continue to prepare Character Assessment Appraisals and Management Plan for Conservation Areas within the Sub-Areas to maintain and enhance the quality of neighbourhoods.
SC194	191	27.37	Chapter 19 'Infrastructure – Policy 11' identifies the key areas for concern in terms of infrastructure provision and recognises the priority to fund

No.	Page	Policy/ Paragraph	Suggested Change
			regeneration measures. <del>In the deprived eastern parts of the borough.</del>
SC195	191	27.39	Phasing and contingencies are described to indicate the priority for provision <u>in line with current anticipated needs and developments.</u> <del>, however the majority of infrastructure identified is required to address cumulative impacts alongside development and is not considered critical to the delivery of the Core Strategy of it cannot be provided as anticipated.</del>
SC196	213	28.3	The Community Plan (Sustainable Communities Strategy);
SC197	214	28.8	<del>The principle of retaining</del> Retention of Wimbledon as Merton's Major centre will be delivered in part through planning decisions and in part through initiatives via the Economic Development Strategy (March 2010).
SC198	223	29	<u>Habitats Regulation Assessment Screening Exercise for Merton's Local Development Framework (2010)</u>
SC199	223	29	<u>GLA London Industrial Benchmarks (2007 and 2010 update)</u>
SC200	223	29	<u>London Policy Office Review (November 2009)</u>
SC201	223	29	<u>Merton's Affordable Housing Viability Study – Statement of Initial Findings (2009)</u>
SC202	223	29	<u>Merton's Viability of Code for Sustainable Homes in Merton: Supplementary Presentation of the Local Development Framework Affordable Housing Viability Study (2010)</u>
SC203	223	29	<u>Merton climate change: Renewable energy resources in Merton: a preliminary assessment (2009)</u>
SC204	223	29	<u>Merton climate change research: Town Centre Morden: CHP Plant Option Appraisal *2919(</u>
SC205	223	29	<u>Merton climate change research: Carbon assessment of domestic housing in London Borough of Merton (2010)</u>
SC206	223	29	<u>Merton's Dwelling Conversions Background Paper – Interim Statement of Findings (October 2010)</u>
SC207	224	29	<u>Live/ Work Developments in Merton (in progress – 2010).</u>
SC208	225	30.1	<del>The purpose of this table is to explain how each of the policies relate to the strategic objectives identified for the Core Strategy, and how they contribute to their delivery. The purpose of table 30.1 is to identify at a glance which Core Strategy policies are able to deliver the relevant Strategic Objective(s). If the table shows a tick this represents the main Core Strategy policy delivering the objective. For example Strategic Objective 1 is delivered equally across the Core Strategy policies identified and Strategic Objective 2 highlights Mitcham CS2 as the main policy to deliver this strategy.</del>
SC269	208	Glossary of	<b>District Centres:</b> District centres will usually comprise

No.	Page	Policy/ Paragraph	Suggested Change
		Terms	groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.
SC210	240	Glossary of Terms	Planning Policy Guidance Notes (PPG's) – Former central government guidance on a range of topics from transport to retail policy giving advice to regional and local policy markets on the way in which they should devise their policies in order to meet national planning goals. Most PPGs have now been replaced by <a href="#">Planning Policy Statements</a> .
SC211	240	Glossary of Terms insert definition of scattered employment sites between sequential test and SINCs	<u>Scattered Employment Sites – An employment site that is not a designated employment site (a site that is not a Strategic Industrial Location or Locally Significant Industrial Site) as detailed in Merton's adopted Proposals Map (as amended).</u>
SC212	240	Glossary of Terms	Site of Special Scientific Interest (SSSI) – A site identified under the Wildlife and Countryside Act 1981 (As amended by the Countryside and Rights of Way Act 2000) as an area of special interest by reason of its <del>flora and fauna geographically or physiological features (basically plants, animals and natural features) relating to the earth's structure.</del> plants, animals and natural features relating to the earth's structure.
SC213	240	Glossary of Terms	Strategic Environmental Assessment (SEA) – A process of environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. It is required by European Directive 2001/42/EC (the Strategic Environmental Assessment or SEA Directive) <del>“on the assessment of the effects of certain plans and programmes on the environment”.</del>

**Appendix B Annex 1**

**Table 18.1 Affordable housing requirements for Merton**

<b><u>Threshold</u></b>	<b><u>Affordable Housing Target Units)</u></b>	<b><u>Affordable Housing Tenure Split</u></b>	<b><u>Provision Requirement</u></b>
<u>10 units or more</u>	<u>40%</u>	<u>60% Social Rented and 40% Intermediate</u>	<u>On-Site</u>  <u>Only in exceptional circumstances will the council consider the provision of affordable housing off-site or financial contributions in lieu of provision on-site and this must be justified.</u>
<u>1-9 units</u>	<u>20%</u>	<u>60% Social Rented and 40% Intermediate</u>	<u>Provision of an affordable housing equivalent to that provided on-site as a financial contribution.</u>