

Merton Council

Borough Plan Advisory Committee Agenda

Membership

Councillors:

Aidan Mundy (Chair)
Najeeb Latif (Vice-Chair)
Linda Kirby
Dennis Pearce
Geraldine Stanford
Anthony Fairclough

Co-opted members:

Substitute Members:

Stephen Crowe
Nick Draper
Simon McGrath

Date: Wednesday 7 October 2020

Time: 7.15 pm

Venue: Zoom

This is a public meeting and attendance by the public is encouraged and welcomed.
For more information about the agenda please contact
future.merton@merton.gov.uk or telephone [020 8545 3837](tel:02085453837).

All Press contacts: communications@merton.gov.uk, 020 8545 3181

Borough Plan Advisory Committee Agenda

7 October 2020

1	Apologies for absence	
2	Declarations of Pecuniary Interests	
3	Notes of the previous meeting	1 - 4
4	Draft Local Plan for public consultation - stage 2a	5 - 24
5	Adoption of FutureWimbledon supplementary planning document (please note appendix 5b is to follow)	25 - 68
6	Public consultation on Merton's air quality supplementary planning document	69 - 120

Note on declarations of interest

Members are advised to declare any Disclosable Pecuniary Interest in any matter to be considered at the meeting. If a pecuniary interest is declared they should withdraw from the meeting room during the whole of the consideration of that matter and must not participate in any vote on that matter. For further advice please speak with the Managing Director, South London Legal Partnership.

BOROUGH PLAN ADVISORY COMMITTEE

NOTES OF MEETING – 4th June 2020

Meeting hosted on Zoom

Attendees:

Cllrs: Aidan Mundy (Chair); Carl Quilliam; Linda Kirby; Dennis Pearce; Geraldine Stanford; Najeeb Latif.

Merton Council Officers: Tara Butler; Jill Tyndale, Eben van der Westhuizen, Louise Fleming (Democracy Services), Amy Dumitrescu (Democracy Services)

Meeting notes and action points

Agenda item 1: Apologies for absence – none

Agenda item 2: Declaration of pecuniary interest– no declarations of pecuniary interest.

Agenda item 3: Notes of previous meeting - notes of the previous meeting agreed as accurate;

Agenda item 4: Adoption of Merton’s Locally Listed Buildings

RESOLVED

A Considers the proposed additions to Merton Local List and made the recommendations on each building / structure as set out in table 1 below.

B Resolved not to recommend adding 4-7 Upper Green East and 7-11 Upper Green West to council.

NEW RECOMMENDATION: to undertake a local listing review annually and bring to the Borough Plan Advisory Committee.

Table 1 – BPAC resolutions relating to Locally Listed Buildings

Address	Comment on recommendation
Street Lighting Control Cabinet, Hartfield Crescent jcn. Beulah Road	Agree with officer recommendation to add to local list
Ridgway Stables, 93 Ridgway, Wimbledon, SW19	Agree with officer recommendation to add to local list
Manor Club and Institute, 76 Kingston Road, South Wimbledon.	Agree with officer recommendation to add to local list
John Innes Cricket Club Pavilion	Agree with officer recommendation to add to the local list.
Swan Public House, 89 Ridgway	Agree with officer recommendation to add to the local list.

Trolleybus Traction Pole, 241-243, Burlington Road	Agree with officer recommendation to add to the local list
The Vicarage, 16 Copse Hill	Agree with officer recommendation to add to the local list.
Morden Court Parade, London Road	Agree with officer recommendation to add to the local list.
20 Malcolm Road, SW19 4AS	Agree with officer recommendation to add to the local list
Street Lamp Standards, Bertram Cottages	Agree with officer recommendation to add to the local list.
62, 64, 66, 70, 72, 74 & 76 Bathgate Road	Agree with officer recommendation to add to the local list.
Cast Iron Sewer Vent, Southside, Wimbledon Common.	Defer to next round of local listed building as the landowner is currently unknown and may not have responded to the consultation.
Art Deco Commercial Buildings on Lombard Road, Lombard Business Park	Agree with officer's recommendation to add to the local list.
Mitcham Police Station, 58 Cricket Green, Mitcham	Defer to next round of local listed buildings – the information in the officer's report needs to be updated to represent the current building as at 2020.
Kellaway House, 326 London Road, Mitcham, CR4 3ND	Agree with officer's recommendation to add to the local list
4, 5, 6 & 7 Upper Green West, Mitcham CR4 3AA	Agree with officer's recommendation <u>not</u> to add to the local list
5, 7, 9 & 11 Upper Green East, Mitcham CR4 2PE	Agree with officer's recommendation <u>not</u> to add to the local list

Agenda item 5 – South London Waste Plan – recommendation for submission to the Secretary of State

Councillors considered the report and were updated on:

- how the London Plan waste apportionment takes future population change, forecast employment change and other matters into account
- The position of boroughs waste apportionment to arisings.
- What the four boroughs doing about the waste generation (e.g. from supermarkets)
- That the plan can accommodate changes in waste, such as are being driven by Covid19
- The waste hierarchy and businesses operating in the circular economy

RESOLVED:

A. That the Borough Plan Advisory Committee consider the contents of this report and resolve to recommend that Cabinet recommend to Council, to submit the draft South London Waste Plan to the Secretary of State, understanding that this will be preceded by a statutory six-week pre-submission publication period.

B. That approval of any amendments arising during or subsequent to the Examination-in-Public be delegated to the Director of Environment and Regeneration in consultation with the Cabinet Member for Regeneration, Environment and Housing.

Agenda item 6 – Local Plan update

The report was for discussion and had no specific recommendations

Councillors discussed the report and asked questions, including:

- How the impact of Covid19 related promotion of active travel might be taken into account in future planning policies
- How the economic assessment would be carried out, particularly relating to Wimbledon Village.

This page is intentionally left blank

Committee: Borough Plan Advisory Committee

Date: 7th October 2020

Wards: All

Subject: Public consultation on Merton's Local Plan (stage 2a)

Lead officer: Director of Environment and Regeneration, Chris Lee

Lead member: Cabinet Member for Regeneration, Housing Transport, Councillor Martin Whelton

Contact officer: Future Merton: Tara Butler

Recommendations:

A. That the Borough Plan Advisory Committee considers the contents of the report and delegates approval of the final documents for public consultation between 30th October 2020 and 11th January 2021 on the revised Stage 2a Local Plan to the Director of Environment and Regeneration, Chris Lee in consultation with the Cabinet Member for Housing, Regeneration and Transport, Councillor Martin Whelton.

-
- 1.1. This report summarises the Local Plan's draft planning policies and recommends that the Borough Plan Advisory Committee advises that Cabinet delegates the approval of the final documents for at least six weeks of public consultation on the draft Local Plan to the Director of Environment and Regeneration in consultation with the Cabinet Member.
 - 1.2. Although statutory consultation is for six weeks, it is proposed to run the public consultation for more than eight weeks from 30th October 2020 and 11th January 2021 to account for the current unusual circumstances.
 - 1.3. Usually Members would receive a draft of the consultation documents to consider as part of this report. In this case it is recommended that councillors consider the direction of travel set out in this report and that the consultation material is delegated to the Director in consultation with the Cabinet Member due to a series of fairly unique circumstances:
 - At the current time public consultation will be exclusively digital. Officers are working towards using software including the council's new mapping software to ensure that this consultation is easier for our residents and others to access, to navigate and to understand what is proposed for any particular neighbourhood.
 - This will be the second round of "stage 2" consultation and a summary of the policy direction changes accompanies this report. While many of the policies have been strengthened by evidence and responses to the previous consultations, there aren't any significant changes in policy direction.

- On 1st September 2020 government introduced changes to the existing planning system that allows high street businesses (shops, offices, cafes, restaurants, banks etc) far greater flexibility in adapting to provide other services. Most of the changes to the Use Class Order reflects the direction of travel already in Merton's emerging planning policies. However all planning policies, site allocations and land designations have to be reviewed to ensure that they are factually correct under the new changes and this review is still underway.

2 DETAILS

- 2.1. Merton's Local Plan was last consulted on in early 2019. In July 2019 Cabinet resolved to amend the timetable for the Local Plan in part to take account of the unsettled outlook for Merton's share of London's housing delivery (and the associated impacts on infrastructure) in the London Plan, which had not yet been finalised. The new timetable proposed public consultation in autumn 2020 which is the subject of this report.
- 2.2. As it happens, the timetable extension has allowed the council time to cope better with the impact of Covid19 restrictions on plan-making that have occurred since March 2020.
- 2.3. It is clear that Covid19 has dramatically accelerated trends that had already started: all types of online shopping, online supermarket and restaurant deliveries, closure of mid-range high street stores and strongly increasing demand for Merton's industrial space.
- 2.4. However it is also clear that in the relatively brief six months we've been living with the devastating effects of Covid 19, the extent of the macro-economic impacts, including on the development industry and on the way we live our lives, are still not fully known. All sorts of very significant changes are being mooted: the demise of offices as places of work and the knock on effect on entire city centres; greater – global - flexibility in where many office workers will choose to work from; new demands for better and more reliable coverage for rapid broadband / 5G infrastructure, changes to how we travel, where we want to live, the designs of new homes in the future etc. Perhaps the most immediate change is the rapid decline in financial investment capabilities right across the private, public and third sector, from international investors to individual householders.
- 2.5. It is therefore important to clarify that while officers have been following and mindful of the many forecasts and discussions on the medium to long term impact of Covid19 on the way we live our lives, we are not recommending that at this particular time Merton's Local Plan be reorganised to take account of the myriad of different predictions
- 2.6. It is also important to clarify that Merton's Local Plan has not been changed to take on board matters proposed in government's "*Planning for the future*" White Paper. This consultation closes on 29th October 2020; it proposes almost a complete overhaul of the English planning system, including how local infrastructure and affordable housing might be funded. However it is too early to start making changes to Merton's Local Plan as the White Paper's path is through this consultation and then with further scope for

changes as primary legislation is created. Therefore what is proposed in the White Paper consultation may not be what ends up at the other end.

2.7. The new draft plan has been informed by:

- What respondents have told us at previous consultations
- National policy and London Plan changes
- Local evidence

National policy changes

2.8. On 1st September 2020 government introduced a new statutory instrument to significantly increase changes allowed in high streets and other business areas without the need to seek planning permission.

2.9. Rather than the use of buildings being allocated as “retail” or “café/restaurant” or “light industrial”, there are now three very broad categories that allow premises to change with complete flexibility to other uses within the same category without any need to seek planning permission.

2.10. These changes do not affect heavy industry, storage or residential.

2.11. Officers consider that the intention behind the changes is sound where it relates to town centres and high streets. High streets have been struggling to keep pace with changing consumer habits (even pre Covid) Allowing businesses greater flexibility to adapt and diversify to meet changing customer demand can help economic recovery. In addition, drinking establishments (pubs and bars) and hot food takeaways are now prevented from changing to any other use without seeking planning permission, which reflects Merton's policy direction on restricting hot food takeaways near schools and supporting viable local pubs in Merton's existing and emerging Local Plan.

2.12. However, officers consider that there are unintended consequences to these new proposals that conflict with the NPPF on plan-making matters and which will need to be resolved before mid 2021 submission to the Secretary of State.

(i) The NPPF requires Local Plans to assess the demand for different types of uses (e.g. business floorspace, health services, childcare) and plan for them in Local Plan – this will be difficult to achieve if any of these uses can change at will outside the planning system.

(ii) The NPPF's Chapter 7 (town centres) requires councils to define the location of town centres and shopping areas and “*make clear the range of uses permitted in each location...*”. It is also difficult to see how the NPPF's “town centre first” approach for large retail developments will still be achievable, although this is currently restrained by the lack of demand.

2.13. Appendix A summarises the amendments made to policies to provide greater flexibility on town centre policies updated to accommodate greater flexibility in non-residential uses government's September 2020 Use Class Order changes.

- 2.14. **Consultation responses** Previous responses to consultation are set out in Section 4 of this report and a summary of evidence.
- 2.15. **London Plan status update:** at the time of writing (end September 2020) the London Plan has not yet been finalised. The Mayor of London has received the independent Inspector's report and has issued an Intent to Publish London Plan to the Secretary of State, who is the final arbiter of whether the plan can be published. The Secretary of State and Mayor have exchanged correspondence during 2020 (available online: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/news-about-london-plan-and-associated-london-plan-guidance>). The main source of disagreement is how many homes will need to be built in London over the next decade (disaggregated to each borough as each borough's housing target.)

3 ALTERNATIVE OPTIONS

- 3.1. There are a variety of alternative options that could be considered at this stage, mainly around taking an alternative policy direction.
- 3.2. Officers have carefully considered the emerging Local Plan and believe that the recommendations to consult are sound. Feedback from this consultation will inform the final Local Plan, so there is still opportunity for alternatives to be considered and taken forward where these are justified.

4 CONSULTATION UNDERTAKEN OR PROPOSED

Consultation undertaken

- 4.1. A Stage 1 public consultation took place between October 2017 and January 2018. This was the first stage, asking general questions about what sites or what policies the Local Plan might contain. Over 1,000 responses were received; far more than previous Local Plan consultations.
- 4.2. A Stage 2 public consultation took place between October 2018 and January 2019. Like this stage, it contained draft policies, potential sites for allocation and land designations (e.g. town centre boundaries) Approximately 240 respondents raised over 1,500 separate points. The feedback we received was reported to Merton's Borough Plan Advisory Committee in March 2019 (see link to report: <https://democracy.merton.gov.uk/documents/s26977/04%20BPAC%20Local%20Plan%20and%20FW%20masterplan%20summary%20of%20consultation%20responses%20Mar2019.pdf>)
- 4.3. All responses received to each stage of the consultation are also available online (with personal details removed) www.merton.gov.uk/newlocalplan

Consultation proposed

- 4.4. It is proposed that public consultation takes place between Friday 30th October 2020 and Monday 11th January 2021; this is longer than the

statutory six week provision to take account of the current unusual circumstances.

- 4.5. Covid19 restrictions mean that we already know that this consultation will have to be carried out online and the usual opportunities of community forums or attending residents association meeting face-to-face will not be an option. Learning from recent digital consultation successes this summer such as on the housing delivery research (over 2,500 responses) and the ongoing Borough Character research, it is really important that digital consultation is easier to access and more engaging than we have done previously if we are to attract and encourage a broad range of responses that represents everybody who lives and works in Merton.
- 4.6. Officers are working with the new GIS software towards a more animated presentation of the Local Plan that should be more interesting and easier for people to access and understand. We also want to make it easier for people to find out more about their neighbourhood without having to also view other information that they might not be interested in.
- 4.7. Should Cabinet resolve to delegated approval of the consultation draft Local Plan to the Director and the Cabinet Member for public consultation, officers will work to present the information in a more user friendly digital format and then seek approval from the Director and Cabinet Member for the consultation material to be published.

5 TIMETABLE

- 5.1. In July 2019 Merton's Cabinet resolved to amend the timetable for producing a Local Plan (known as Merton's Local Development Scheme) and for the next stage of consultation to take place in autumn 2020
- 5.2. As set out in this report and in Merton's Local Development Scheme 2019-22 the next steps are:
 - 11th January 2021 – consultation finishes, consider comments
 - Spring 2021 – pre-submission publication
 - Summer (Quarter 3) 2021 – submission to the Secretary of State for independent examination
 - Winter (Quarter 4) 2021 - adoption

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. Funding to support the Local Plan production, including the consultations, comes from existing resources.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. The Planning and Compulsory Purchase Act 2004 (as amended) requires at least two stages of engagement on local plan making. The consultation will

be in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. Local Plans contain planning policies to help improve community cohesion and are subject to Sustainability Appraisal / Strategic Environmental Assessments and Equalities Impact Assessments. These appraisals will be published alongside the draft Plan for consultation.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. The draft Local Plan contain planning policies to help improve community cohesion and are subject to Sustainability Appraisal / Strategic Environmental Assessments which also consider matters of crime and disorder. These appraisals will be published alongside the draft Plan for consultation.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. A risk register is produced as part of managing the production of the Local Plan.

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Appendix A – summary of emerging Local Plan policy direction

12 BACKGROUND PAPERS

- National Planning Policy Framework (NPPF) 2019 and national planning policy guidance
- Use Class Order changes 2020
- London Plan 2016 Intend to Publish London Plan 2019 and associated Inspector's report, Secretary of State correspondence.
- Local evidence specific to Merton as listed in Appendix A and
- Report to Merton's Borough Plan Advisory Committee report (March 2019)
<https://democracy.merton.gov.uk/documents/s26977/04%20BPAC%20Local%20Plan%20and%20FW%20masterplan%20summary%20of%20consultation%20responses%20Mar2019.pdf>

Summary of the policy direction for Merton's Local Plan Stage 2a public consultation – autumn 2020

This documents summarise the policy direction that will be contained within Merton's Stage 2a public consultation in autumn 2020

The draft [Local Plan](#) (stage 2) comprises strategic and development management policies:

Strategic policies set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for example housing (including affordable housing), employment, retail and other commercial, infrastructure, waste management, water infrastructure flood risk management, community facilities (such as health, education), green infrastructure and planning measures to address climate change mitigation and adaptation.

detailed polices are detailed policies for specific areas, neighbourhoods or types of development covering a range of topics for example housing, climate change and design (table below provides a full list of topic areas covered in our draft Local Plan).

Evidence developed since consultation to inform the draft Local Plan includes:

Completed in 2019 (available online via www.merton.gov.uk/local-plan-research)

- Merton's Strategic Housing Market Assessment 2019
- Merton's Playing Pitch Study 2019
- Merton's Indoor Sports Facility Study 2020
- Merton's Transport Strategy and Local Implementation Plan 2019
- Merton's Green Infrastructure, Biodiversity and Open Space Study 2020
- Local Plan viability (including affordable housing) 2020
- Merton's Strategic Flood Risk Assessment 2020
-

Underway – to be completed 2020/21

- Borough Character Study (including assessment of mid-rise and tall buildings) – currently out for public consultation until end October 2020
- Housing delivery research – due to be completed October 2020
- Infrastructure Delivery Plan - annual requirement

The long-term impacts of Covid19 on the planning system in general and issues in Merton is currently unknown but is likely to be part of all future assessments

Policy Title	Summary of progress since Stage 2 consultation
Strategic Policy H4.1 Housing Choice	<ul style="list-style-type: none"> • Completion of Merton’s Local Plan Housing Viability Study is imminent. <p>Draft local plan policy requirements are:</p> <ul style="list-style-type: none"> • 50% borough-wide strategic affordable housing target • 70% Low cost rent and 30% Intermediate <p>Affordable housing site requirement 10 or more units):</p> <ul style="list-style-type: none"> • 50% for public sector sites • 40% minimum all other sites <p>Affordable housing site requirement (1 to 9 units):</p> <ul style="list-style-type: none"> • Financial contribution for 20% affordable housing provision
Strategic Policy H4.2 Housing Provision	<ul style="list-style-type: none"> • Intend to Publish London Plan (Dec 2019) housing target is at an advanced stage with significant weighting <p>Draft Local Plan housing target (2021 - 2036) sets out housing target of:</p> <ul style="list-style-type: none"> • 918 homes per year • 13,770 additional homes in total • Inclusion of an updated housing trajectory (i.e. housing delivery plan) • New target envisaged to apply (for monitoring purposes) from financial year 2021/22 onwards
Policy 4.3 Housing Mix	<ul style="list-style-type: none"> • Setting out of a borough wide bed unit size mix requirement for all housing scheme proposals of: <ul style="list-style-type: none"> 33% = 1 bed 33% = 2 bed 34% = 3+ bed
Policy H4.4 Supported care housing for	<ul style="list-style-type: none"> • Minor revisions made to improve clarity of policy justification in response to stage 2

vulnerable people or secure residential institutions for people housed as part of the criminal justice system	consultation feedback.
Policy H4.5 Student housing, other housing with shared facilities and bedsits	<ul style="list-style-type: none"> • Policy sets out the criteria for considering planning applications for shared accommodation
Policy H4.6 Accommodation of Gypsies and Travellers	<ul style="list-style-type: none"> • Policy sets out the criteria for establishing a traveller site • One legally established council owned site in the borough located on Brickfield Road, Wimbledon. • Further research work to update the needs identified in the 2013 Study and how this will be addressed over the new Local Plan period is required.
Policy H4.7 Build to Rent	<ul style="list-style-type: none"> • Policy sets out planning requirements for Build to Rent schemes • Minimum of 50-home threshold • Compliance with affordable housing provision requirements • Secured by covenant for 30 years minimum • 3-year minimum tenancies • Security and professional management provision
Strategic Policy HW2.1 Health and wellbeing	The policy set out: Adopting dementia design approaches in proposals. Emphasising the importance of health and Working with partners to tackle health inequalities
Policy HW2.2 Delivering healthy places	<ul style="list-style-type: none"> • Appropriate minor changes have been made. • Emphasising the importance of health and wellbeing considering COVID -19.
Policy N3.1 Colliers Wood/ Surrounding area of Colliers Wood	<p>This policy clarifies that Colliers Wood is a district centre (like Mitcham and Morden)</p> <p>Linked to proposed new South Wimbledon local centre.</p> <p>Continue support for creation of distinct streets with businesses and services on ground floor and residential above.</p> <p>Ground floor and business uses will be able to be more flexible in accordance with government Use Class Order changes</p> <p>No significant change from Stage 2</p>

Policy N3.2 Mitcham Town Centre/ Surrounding area of Mitcham Town Centre	<p>Policy clarifies that Mitcham continues to be a District Centre (alongside Morden and Collier Wood)</p> <p>Continued support with local councillors to explore increase in footfall and investment in Mitcham town centre.</p> <p>Ground floor and business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes</p>
Policy N3.3 Morden/ Morden Regeneration Zone/ The Wider Morden Town Centre Area	<p>Policy clarifies that Morden continues to be a District Centre (alongside Mitcham and Colliers Wood)</p> <p>Comprehensive regeneration within central Morden Regeneration Zone</p> <p>New public realm, retail offer and 2000 new homes.</p> <p>Incremental development in the neighbouring Wider Morden Town Centre Area</p>
Policy N3.4 Raynes Park Local Centre/ Surrounding area of Raynes Park Local Centre	<p>The policy continues to consider Raynes Park as a local centre (like Wimbledon Village, Arthur Road, North Mitcham)</p> <p>Local community groups helping with research on ensuring a balanced local housing mix while considering the demands for new homes.</p>
Policy N3.6 Wimbledon Town Centre/ Surrounding neighbourhoods of Wimbledon	<p>Wimbledon retaining Major centre status as current planning policy.</p> <p>Future Wimbledon Supplementary Planning Document has been consulted on twice and is recommended for adoption to the same Cabinet meeting and full council in November 2020</p>

	Ground floor and business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes.
Policy N3.5 South Wimbledon	<p>A new policy to consider South Wimbledon as a Local Centre (i.e. like Wimbledon Village, North Mitcham, Arthur Road, Raynes Park etc) , already consulted on in 2019</p> <p>Boundary for new South Wimbledon Local Centre being amended following consultation responses -extending to the north.</p> <p>Cycle and walking connections linked in with High Path regeneration and Harris Wimbledon school. Both developments increasing bus capacity to the area.</p>
Policy N3.7 Wandle Valley	<p>Policy sets out the importance of the Wandle Valley as a strategic, biodiverse and accessible corridor through the borough.</p> <p>Policy has been strengthened to require development within 400m of the WVRP to enhance accessibility to the park.</p> <p>A review is underway on green infrastructure requirements on new development within 400m of the WVRP and the policy will be updated in line with the evidence base.</p>
Strategic Policy D5.1 Placemaking and design/	<p>Policy to create excellent places and provide strong urban design</p> <p>Stronger links made with other policies on sustainable design and flood risk management</p> <p>Borough character analysis will help implement policy by identifying where local character is strong or where it can be improved.</p>
Policy D5.2 Urban design and the public realm	As D5.1
Policy D5.3 Design considerations in all developments	Policy details design considerations in all developments – similar direction to 2019 consultation
Policy D5.4 Alterations and extensions to existing buildings	Policy details how alternations to existing buildings will be considered – similar direction to 2019 consultation
Policy D5.5 Managing heritage assets	Policy sets out how the council will consider heritage assets through the planning system
Policy D5.6 Advertisements	Policy sets out the council's position on advertisements where planning permission is required. Policy updated to clarify what is planning policy and what can be carried out under permitted

	advertising developments
Policy D5.7 Telecommunications	Updates required, including on 5G
Policy D5.8 Shop front design and signage	Policy updated to clarify what is planning policy and what can be carried out under permitted development for shopfronts
Policy D5.9 Dwelling Conversions	Queries raised at consultation to stop / severely restrict dwelling conversions
Policy D5.10 Basements and subterranean design	<p>Policy setting out how basements and subterranean design will be considered</p> <p>Strengthen the policy links to Sustainable Drainage (SUDS) Supplementary Planning Document (SPD) and the Basement and subterranean SPD.</p> <p>The policy is focussed on the design aspect of basement developments.</p>
Strategic Policy In6.1 Infrastructure	<p>Policy ensures necessary infrastructure will be provided to support growth in the borough. Information added on digital technology, utilities and emergency services.</p> <p>Policy is being reviewed in line with the new Use Class Order 2020 and relevant changes will be made.</p>
Policy In6.2 Social and community infrastructure	<p>Policy ensures necessary infrastructure will be provided to support growth in the borough. Updated information on education and health needs.</p> <p>Policy is being reviewed in line with the new Use Class Order 2020 and relevant changes will be made.</p>
Strategic policy W.6.3 Waste management	<p>Policy sets out Merton's strategic approach to dealing with planning applications for waste transfer and management sites, similar to Sutton, Croydon and</p> <p>Detailed planning policies to assess planning applications for waste management London Waste Plan published for comments from 4 September 2020 till 22 October 2020.</p> <p>Benedict Wharf site no longer safeguarded for waste management.</p> <p>No new waste management sites proposed in Merton.</p>
Strategic Policy T6.4 Supporting an inclusive and better-connected transport network	<p>Title changed. Stage 2 comments reviewed, and amendments incorporated.</p> <p>Policy reviewed to make more succinct. Reference to healthy streets approach and vision zero included within supporting text.</p>
Policy T6.5 Sustainable and active	Policy split into separate walking and cycling policies to reflect priority of delivering more active

travel	travel. Policy made more concise. Similar direction to
Policy T6.6 Transport impacts of development	Stage 2 comments reviewed, and amendments incorporated. Further review of the policy is progress in the context on Climate change and London Plan modification/comments. Outlines construction logistic approach. Introduces MTS (Mayor s Transport Strategy) priority areas.
Policy T6.7 Car parking and servicing	Policy amended to make more concise, better clarify on servicing, delivery requirements, disable parking and refuse requirements. Approach reviewed in respect to Secretary of State response to London Plan, particularly parking standards. Electric vehicle charging infrastructure requirements broadened.
Policy T6.8 Transport infrastructure	Policy amended to reference CR2 and other strategic transport projects, include reference to non-safeguard sites. Reference to Sutton Link and High Path Estate incorporated.
Policy Ec7.1 Economic Development	<p>Policy sets out council's approach to economic development</p> <p>Update to respond to consultation responses, Declaration of Climate Emergency, circular economy demands</p> <p>Policy updated to demonstrate how some business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes.</p>
Policy Ec 7.2 Employment areas in Merton	<p>Policy updated to demonstrate how some business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes.</p> <p>Public consultation revisions include reference to protection for existing businesses from new noise-sensitive neighbours ("agent of change" policy)</p>
Policy Ec 7.3 Offices in town centres	Policy updated to demonstrate how some business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes.
Policy Ec7.4 Protection of scattered employment sites	Some consultation responses sought increased release for housing. Unlikely to be recommended as a blanket policy change as continued high demand / rental yields for local business space and lack of sites
Policy Ec7.5 Local employment opportunities	Policy continues current approach of seeking apprenticeships and other local employment opportunities for Merton residents from the construction and final use (where possible) of major development sites
Policy Tc7.6 Location and scale of	Policy updated to demonstrate how some business uses will be able to be more flexible in

development in Merton's town centres and neighbourhood parades	accordance with government's September 2020 Use Class Order changes
Policy Tc7.7 Protection of shopping facilities within designated shopping frontages	Policy updated to demonstrate how some business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes
Policy Tc7.8 Development of town centre type uses outside town centres	Policy updated to demonstrate how some business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes
Policy Tc7.9 Protecting corner/ local shops	Policy updated to demonstrate how some business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes
Food and drink / leisure and entertainment uses Policy Tc7.10	Policy updated to demonstrate how some business uses will be able to be more flexible in accordance with government's September 2020 Use Class Order changes
Culture, arts and tourism development Policy Tc7.11	Limited comments received; tend to be specific to particular parts of the borough.
Strategic Policy O8.1 Open Space, Green Infrastructure and Nature Conservation	Policy protects and enhances open space, green infrastructure and areas of nature conservation in the borough. Incorporates recommendations from the Green Infrastructure, Biodiversity and Open Space Study (2020) and the emerging Climate Action Plan. Recommended policy designation map changes will form part of the next consultation.
Policy O8.2 Open Space and Green Infrastructure	As above in O8.1.
Policy O8.3 Biodiversity and nature conservation	As above in O8.1.
Policy O8.4 Protection of Trees	Policy protects trees and encourages replacement and planting of new trees in the borough.
Policy O8.5 Leisure, Sport and Recreation	Policy protects playing pitches in line with recommendations in the Playing Pitch Strategy (2019) and promotes opportunities for sport and recreation.
Policy O8.6 Urban Greening	New policy introduced with minimum urban greening requirements for major developments and encouraging urban greening on minor developments.
Strategic Policy F8.6 Managing flood risk from all sources of	Policy ensures that development is located away from areas considered to be at high risk of flooding, incorporating sustainable drainage wherever possible, ensuring the borough's green

flooding	<p>infrastructure network is maintained, which also contributes to ensuring that biodiversity can adapt to a changing climate, as well as protecting our water resources and water quality.</p> <p>Sets out the council commitment to working with our partners for example the Environment Agency, Thames Water and neighbouring borough in mitigating flood risk.</p>
Policy F8.7 How to manage flood risk	<p>Policy ensures that development is located away from areas considered to be at high risk of flooding, incorporating sustainable drainage wherever possible</p> <ul style="list-style-type: none"> • A stronger link to supporting documents for example Basement Supplementary Planning Document (SPD) and soon to be adopted Sustainable Drainage SPD. • Guides development to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. States that unacceptable developments and land uses will be refused in line with national policy and guidance, the Council's Strategic Flood Risk Assessment (SFRA). <p>We currently carrying out a new Strategic Flood Risk Assessment (SFRA) in partnership with the Environment Agency and Wandsworth Council. The SFRA will inform all flood risk management and basement policies in the Local Plan. The SFRA is expected to be completed by autumn 2020.</p>
Policy F8.8 Sustainable drainage systems (SUDS)	<p>The policy ensures and sets out the Council will requirements for Sustainable Drainage Systems (SUDS) in all development proposals.</p> <ul style="list-style-type: none"> • greater signposting to Basement SPD and the Sustainable Drainage SPD which provide technical guidance.
Policy P.8.9 Improving air quality and minimising pollution Air Quality/ Noise and vibration/ Light pollution/ Odours and fume control/ Land contamination/ Managing pollution from construction and demolition.	<p>The policy aims to:</p> <ul style="list-style-type: none"> • reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and encourage improvements in air quality, particularly during construction and areas that already exceed acceptable air quality standards.
Strategic Policy CC8.10 Promoting sustainable design to mitigate and	<p>This Strategic Policy sets out the overall aims of Merton's climate change policies and the case for going beyond Building Regulations and the emerging London Plan. The climate change</p>

adapt to climate change	policies have been updated to reflect the standards required to deliver Merton's ambition of being net zero carbon by 2050, in line with Merton's emerging Climate Strategy and Action Plan, whilst minimising Merton's future retrofit burden.
Policy CC8.11 Minimising greenhouse gas emissions	This policy aims to drive further carbon savings on site, by: <ul style="list-style-type: none"> • Extending the Mayor's zero carbon target to all minor new build residential development of one or more units and all non-residential development of 500sqm GIA. • Increasing Merton's minimum on-site carbon reduction targets; and • Introducing a new approach to carbon offsetting.
Policy CC8.12 Minimising energy use	This policy aims to minimise energy use and carbon emissions through energy efficiency improvements and drive a fabric first approach, by: <ul style="list-style-type: none"> • Applying the Mayor's energy efficiency targets to all development (major and minor). • Introducing fabric energy efficiency standards which will gradually increase over the next five years. • Introducing Energy Use Intensity targets which will be enforced from 2025; and • Requiring increased disclosure of anticipated energy demand and post-occupancy monitoring.
Policy CC8.13 Low carbon energy	This policy aims to drive the decarbonisation of heat and maximise renewable energy generation in the borough, by: <ul style="list-style-type: none"> • Requiring developers to use efficient low carbon heat and to maximise renewable energy generation on site; and • Banning gas boilers in new build development from January 2023.
Policy CC8.14 Minimising waste and promoting a circular economy	This policy aims to minimise waste and embodied carbon, and promote a circular economy, by: <ul style="list-style-type: none"> • Requiring all developments to be designed to minimise embodied carbon; and • Requiring all major developments and all proposals to demolish and rebuild to carry out a Whole-Life Cycle Carbon Assessment.
Policy CC8.15 Sustainable design standards	This policy aims to drive higher sustainability standards, by: <ul style="list-style-type: none"> • Requiring water use targets for residential developments; and • Requiring BREEAM (Building Research Establishment Environmental Assessment Method) 'Excellent' standards for conversions/ change of use resulting in the creation of one or more new dwellings, and all new build and change of use non-domestic

	development of 500 sqm GIA or more.
Policy CC8.16 Adapting to a changing climate	This policy aims to ensure that development in Merton is adaptable to future climate change impacts (overheating and flooding). The policy wording has been tweaked slightly in line with the new London Plan, but no significant changes have been introduced.

Site allocations

Summary of policy requirements	Summary of progress since Stage 2 consultation
As part of producing a new Local Plan, we are required to identify specific sites for specific purposes, such as housing or employment development known as Site Allocations.	All sites are being reviewed with consideration to the new use class order.

Local Plan vision and strategic objectives

Summary of policy requirements	Summary of progress since Stage 2 consultation
The Strategic Objectives apply to the whole of Merton and provide a framework for the Local Plan and are steppingstones to deliver the vision.	<p>Minor changes have been made to strengthen and/or link to other policy topics for example air quality, health and climate change.</p> <p>This will include reference to the new Merton Community Plan and the Declaration of Climate Emergency.</p>

Policies Map

Summary of Policies Map	Summary of progress since Stage 2 consultation
The policies map shows site allocations and designations for example open space, town centre and transport proposals arising from policies in the Local Plan.	<p>Updating the Policies Map (as part of the Local Plan development).</p> <ul style="list-style-type: none"> • New proposed site allocations • New Local Centre designation: South Wimbledon • Updating the Metropolitan Open Land, Open Space, Green Corridor and Sites of Importance for Nature Conservation designations following completion of Green Infrastructure, Biodiversity and Open Space Study. • Updating South London Waste Plan designations (linked to the emerging South London Waste Plan) • Exploring ways of displaying Local Plan maps interactively as part of the implementation of the new GIS (Geographic Information System) system -making the Policies Map more accessible to residents, developers and to officers.

This page is intentionally left blank

Borough Plan Advisory Committee

7th October 2020

Wards: Abbey, Dundonald, Hillside, Trinity

Adoption of the Future Wimbledon Supplementary Planning Document (SPD)

Lead officer: Chris Lee, Director for Environment & Regeneration

Lead member: Martin Whelton, Member for Regeneration, Housing & Transport

Contact officer: Paul McGarry, Head of Future Merton

Recommendations:

That the Borough Plan Advisory Committee considers the report and advises that Cabinet:

- A. agrees the Consultation Report (Appendix B), including comments, responses and where applicable, amendments to the SPD.
- B. notes the Council has undertaken a screening exercise with relevant statutory bodies to confirm that a Strategic Environmental Assessment is not required to support the SPD.
- C. notes that whilst the Council's constitution permits Cabinet to agree the Adoption of SPDs; in recognition of the cross-party political representation in Wimbledon wards, the decision will be presented to Council.
- D. That Cabinet recommend to Council;
 - i. Adoption of the Future Wimbledon Supplementary Planning Document (Appendix A) in accordance with the Town & Country Planning (Local Planning) (England) Regulations 2012.
 - ii. Delegate to the Director of Environment & Regeneration, in consultation with the Cabinet Member for Regeneration, Housing & Transport, the making of minor factual, editorial and image changes to the SPD prior to publication.

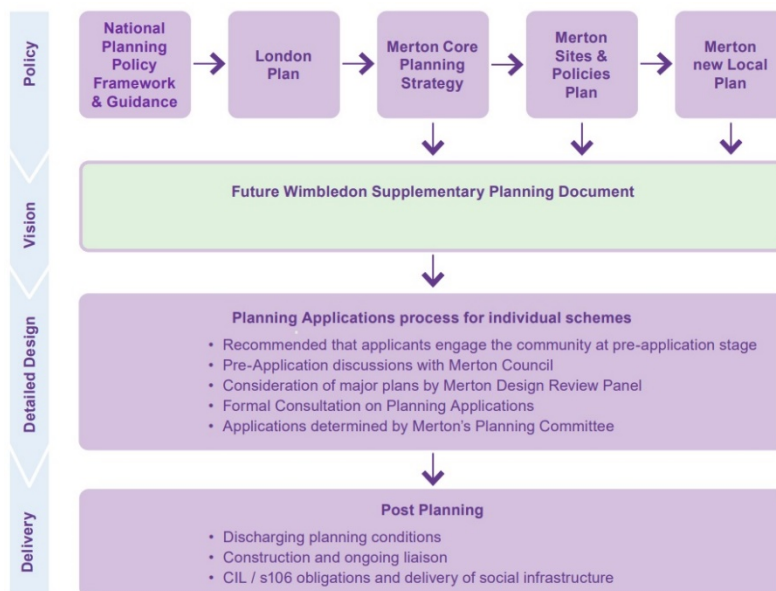
1

2 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 2.1. In recent years, Wimbledon has seen a boom in planning applications for office, hotel and residential development as well as general improvements to existing buildings. Wimbledon is a successful town centre with a strong business community and employment sector as well as a loyal local catchment of residents who support the town and enjoy the facilities Wimbledon town centre has to offer.
- 2.2. The Future Wimbledon Supplementary Planning Document (SPD) provides the opportunity to create and implement a more structured plan for the town

centre going forward; one that is place-based and responds to Wimbledon's characteristics whilst promoting growth and investment.

- 2.3. The SPD supplements Merton's existing Local Plan policies to provide guidance, specific to Wimbledon town centre, for the design of development and public spaces and to attract investment. This report is seeking the adoption of the Future Wimbledon SPD as part of Merton's Local Plan.



- 2.4. During the Coronavirus pandemic we have all experienced changes to our daily lives and seen the impact on our local neighbourhoods and town centres.
- 2.5. Wimbledon has a symbiotic relationship between being a commercial town centre and a much loved town centre for residents. Pre Covid-19, the town centre had a high footfall mid-week thanks to the office base and transport connectivity. This high footfall sustained shops, restaurants and leisure facilities enjoyed by workers, residents and visitors.
- 2.6. During lockdown, we have seen what a rapid decline in the high street looks like and what the impact would be on Wimbledon without a strong employment sector. This is not a sustainable future for any town centre.
- 2.7. Whilst the Future Wimbledon SPD provides guidance for planning applications, it illustrates a long-term vision for Wimbledon's built environment into the 2040s. The vision is focussed on the qualities of place, good public realm, better and co-ordinated design and supports a more flexible mix of town centre uses.
- 2.8. When the SPD was originally drafted, it was a plan for managing growth. The context in which this guidance now sits has shifted dramatically. In the short to medium term, it will guide the recovery of Wimbledon town centre with an emphasis on quality and the experience of the place; leading to longer term growth and transformation.

3 DETAILS

3.1. **Future Wimbledon**

3.2. The council understands that good growth isn't solely established by planning policies. We need to be clear on the nature of the town centre; the uses that contribute towards a vibrant and successful commercial offer; how this integrates with the existing residential communities and how the quality of design – public realm and architectural design lie at the heart of successful places and underpin good growth.

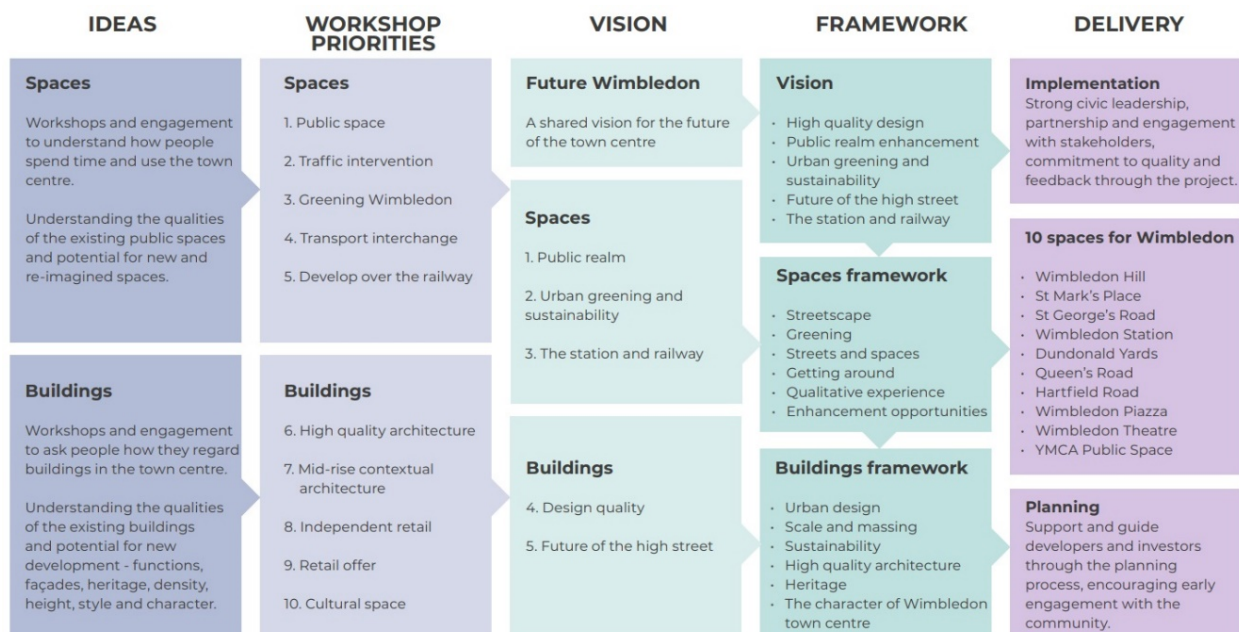
3.3. With an international renown thanks to the Wimbledon Tennis Championships, SW19 is a sought-after location and an increasingly popular place for people to live and for businesses to locate and invest. Wimbledon has the strongest global brand and greatest public transport connectivity in the south west London region.

3.4. The Future Wimbledon Supplementary Planning Document (SPD) has been prepared to create a long-term vision for the future of development in Wimbledon town centre.

3.5. Creating good places isn't just about the buildings and how they look, it's the streets and spaces between that matter; the human scale experience at street level promotes life, vitality and interest that give character to a place.

3.6. The intention of the SPD is to give further clarity and guidance our existing planning polices, to seek high quality development and to give developers the certainty they require of the planning process and to sustain investment in the borough.

3.7. The Future Wimbledon SPD was created through a process of workshop engagement and refining the priorities to form a vision and framework for both buildings and public spaces.



3.8. The Council's priorities for the development of Wimbledon town centre are set out in greater detail in Appendix A to this report.

3.9. In summary, our 5 key priorities are;

Design Quality

- 3.10. Underpinning good growth with architecture that enhances character and uses materials that responds to the local context.

Public Realm

- 3.11. Creation of spaces to dwell, socialise and host events to bring life to the public realm

Urban Greening and Sustainability

- 3.12. The redevelopment of sites provides opportunities for more sustainable design. More planting and biodiversity in developments and on the public realm.

The Future of the High Street

- 3.13. Support a greater flexibility of uses, pop-ups and meanwhile uses to support emerging businesses and add vitality to the town centre.

The Station and Railway

- 3.14. Continue to work with Crossrail 2 and Network Rail to ensure that plans for Wimbledon Station integrate well with the urban fabric and provide long term solutions to traffic flow, passenger experience and contribute to the creation of new public space.

3.15. Coronavirus recovery

- 3.16. Since the close of the Future Wimbledon Consultation on 6th March 2020 the Covid-19 pandemic has accelerated change in our town centre centres and high streets. In particular the shift to online shopping, dining delivery options and sustainable travel (walking and cycling).

- 3.17. Outer London town centres are faring better than central London as more people are working from home and utilising more local amenities.

- 3.18. The focus of the recovery led by central government is “Building back better”, the priorities of which include:

- creating mixed use, sustainable communities
- capturing active travel opportunities
- revitalising town centre by creating flexible town centre buildings and making the most of outdoor space opportunities
- improving air quality and soundscapes for better health and wellbeing

- 3.19. Research from Savills found that the majority of landlords have been considering re-purposing the high street following the demise of retail and casual dining in recent years, but Covid-19 has accelerated the change.

- 3.20. The uses being considered and delivered include the intensification and increases in pop-up and independent food and beverage, leisure, residential, community and business space. The key driver is to bring back footfall to town centres.

- 3.21. Town centres can provide accessible services and connected business hubs that minimise the need for travel.

- 3.22. The vision and priorities of the Future Wimbledon SPD are aligned with the “Build back better” proposals being suggested. In the SPD there is a greater focus on the experience of town centre by creating a mixed use neighbourhood for retail, office, community, culture, leisure and residential. The plan also recognises the importance of the public realm in supporting town centre uses, pop-up events and experiences.

4 ALTERNATIVE OPTIONS

- 4.1. The alternative option to the recommendations in this report would be to not adopt the SPD. The original rationale for creating this guidance was to provide an overall plan to guide development and growth in Wimbledon over the next 20 years. This was in direct response to criticism that development in Wimbledon was piecemeal and uncoordinated.
- 4.2. Not adopting this SPD would mean that there is no detailed guidance for development in Wimbledon town centre. Planning applications would be determined on the basis of existing policy which is not considered to be sufficiently detailed or Wimbledon specific.
- 4.3. Not adopting the SPD diminishes the Council’s ability to drive up quality or provide certainty to developers seeking to invest in Wimbledon. This approach could also lead to an increase in planning appeals.

5 CONSULTATION UNDERTAKEN OR PROPOSED

- 5.1. Please refer to Appendix B: Future Wimbledon SPD Consultation Report (September 2020)

6 TIMETABLE

- 6.1. The SPD has undergone a lengthy process of engagement and refinement as set out in the consultation report (Appendix B)

The timetable for adopting the SPD as formal planning guidance is:

- 6.2. Borough Plan Advisory Committee 7th October 2020
- 6.3. Cabinet 12 October 2020
- 6.4. Council 18 November 2020

7 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 7.1. Production of the SPD, associated officer time and consultation undertaken was delivered through the Future Merton team’s Local Plan budget.
- 7.2. Officer time and resources required to advise planning applicants is anticipated to be more efficient due to the provision of better guidance. This will create a more efficient planning service through a clearer and more

effective pre-application service and planning application determination process.

- 7.3. The SPD will contribute indirect financial benefits to the Council by assisting the regeneration of Wimbledon town centre and increasing the local tax base. Design guidance also provides greater certainty to the local community and developers and will help mitigate costs associated with planning appeals.
- 7.4. The guidance adds detail to the site allocations contained in Merton's Local Plan. Merton Council's own property assets in Wimbledon will benefit from this guidance, adding more certainty to the type and quantum of development that could be achieved should the Council choose to dispose or develop assets in future.

8 LEGAL AND STATUTORY IMPLICATIONS

- 8.1. Appendix B to this report summarises the extensive consultation undertaken in the production of the SPD. Officers are satisfied that the consultation undertaken is in accordance with the requirements for public participation and adoption of the SPD as set out in the Town & Country Planning (Local Planning) (England) Regulations 2012

9 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 9.1. An Equality Analysis of the SPD has been prepared and is available online at www.merton.gov.uk/futurewimbledon
- 9.2. The Equality Analysis has not identified any potential for discrimination or negative impact on equalities. The analysis highlights a positive impact in socio-economic status as the SPD supports growth in the local economy and enhances employment opportunities for the borough.

10 CRIME AND DISORDER IMPLICATIONS

- 10.1. There are no crime and disorder impacts arising from the recommendations in this report. Any changes to buildings or the public realm will be assessed for Secure by Design benefits at the time of planning applications or the delivery of public realm enhancements.

11 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 11.1. There are no risk management or health and safety implications for this report.

12 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- A. Future Wimbledon Supplementary Planning Document 2020.

- B. Future Wimbledon Consultation Report 2020.

13 BACKGROUND PAPERS

13.1. www.merton.gov.uk/futureWimbledon

This page is intentionally left blank

FUTURE WIMBLEDON SPD CONSULTATION REPORT

SEPTEMBER 2020

merton.gov.uk/futurewimbledon



FOREWORD

We'd like to thank everyone who has taken the time to be a part of the Future Wimbledon project. In early 2017 we launched consultation on the future of Wimbledon town centre with workshops in Wimbledon Library. Over three events we gathered feedback from 222 participants, which we used to develop the draft Future Wimbledon Masterplan that was consulted on from October 2018 to January 2019. 760 responses were received in the 2018-19 consultation which informed the January 2020 draft Future Wimbledon Supplementary Planning Document (SPD).

This report explains the consultation process and shares the findings from the January to March 2020 round of consultation Future Wimbledon SPD.

Future Merton have used the feedback from over 1,300 response received since the start of the project to help inform changes to the final Future Wimbledon SPD to be adopted by the Council in November 2020.

"I just want to say thank you to all the team involved with Future Wimbledon. It seems you have all worked very hard on this and produced an overall engaging and clear lay out of the Wimbledon you have in mind. I'm excited to see the vision come into reality over the next few decades." (Wimbledon resident)

"Great job. It's been a long time coming but it makes me feel proud to be part of a town with a strong vision for the future." (Wimbledon resident)

"A very thorough and interesting document. Applaud your vision for more open public spaces and greenery by adding more trees and retaining the beautiful older buildings of character and historical interest to maintain the character and charm of our town. However extremely worried about your intention to allow new buildings to be erected to such huge height." (Wimbledon resident)

"Wimbledon can quite clearly be improved by a better retail offer, better traffic management and, when new buildings have to be built, high quality, well-designed buildings that will complement existing ones. But please can you explain the need for such high buildings that are being proposed for Wimbledon (14 storeys). Can you show what evidence there is for so much more office space in Wimbledon? How can you plan for the future before you know what is happening with Crossrail?" (Wimbledon resident)

"We welcome the Future Merton SPD, giving guidelines for the type of development that is envisaged for the town centre is helpful for our future planning. The redevelopment of Wimbledon station and the associated retail area would be a welcome benefit to both the business and the local community.

We would particularly welcome an increase in pedestrianised and landscaped areas to enhance the local environment. We like the idea of buildings with active street frontages and think the taller buildings are well positioned in the central area and over the railway tracks.

Overall the general thrust and principles outlined in the Future Wimbledon SDP has our support and we look forward to it being finalised and adopted by Merton Council, so that it can be used to guide future development of Wimbledon Town Centre." (Wimbledon business and landowner)

CONTENTS

INTRODUCTION

CONSULTATION

HOW WE CONSULTED

KEY STATISTICS

WHO RESPONDED

FEEDBACK

INTRODUCTION

ENGAGEMENT

FUTURE WIMBLEDON

DESIGN QUALITY

URBAN GREENING AND SUSTAINABILITY

FUTURE OF THE HIGH STREET

THE STATION AND RAILWAY

DELIVERY

LANDOWNERS

CONCLUSION



1 INTRODUCTION

1.1. Since the close of the Future Wimbledon Consultation on 6th March 2020 the Covid-19 pandemic has accelerated town centre change. In particular the shift to online shopping, dining delivery options and sustainable travel (walking and cycling).

1.2. The focus of the recovery led by central government is “Building back better”, the priorities of which include:

- creating mixed use, sustainable communities
- capturing active travel opportunities
- revitalising town centre by creating flexible town centre buildings and making the most of outdoor space opportunities
- improving air quality and soundscapes for better health and wellbeing

1.3. Research from Savills found that the majority of landlords have been considering re-purposing the high street, but Covid-19 has accelerated the change. The uses being considered and delivered include the intensification and increases in food and beverage, leisure, residential, community and business space.

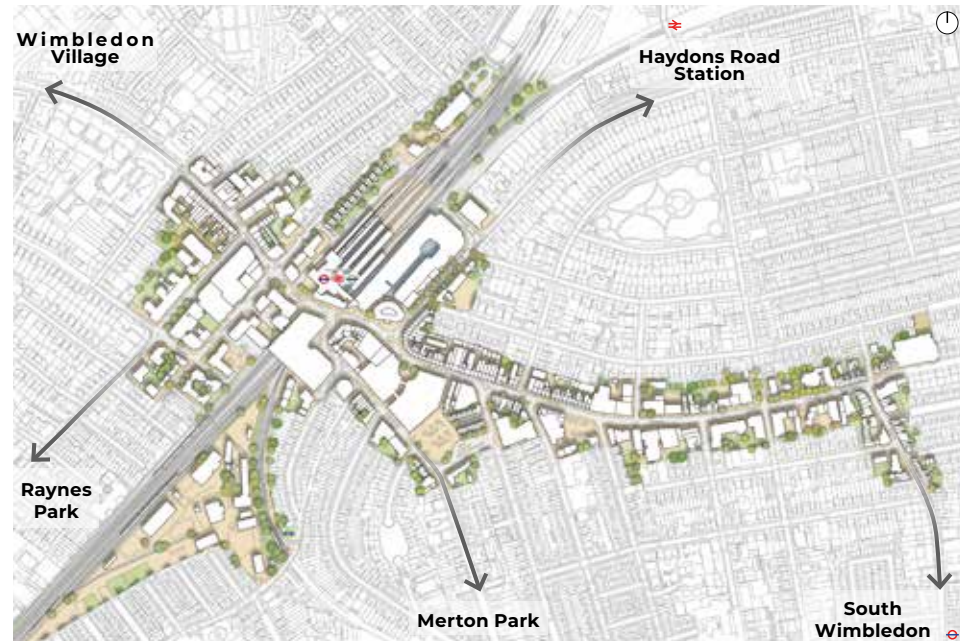
1.4. Town centres can provide accessible services and connected business hubs that minimise the need for travel.

1.5. The vision and priorities of the Future Wimbledon SPD aligned with the “Build back better” proposals being suggested. There was a greater focus on the experience of town centre by creating a mixed use neighbourhood for retail, office, community, culture and leisure.

1.6. The comments received during the January-March 2020 consultation have been considered and changes suggested by respondents have been considered. Any

changes are required to be in conformity with national and regional planning legislation, policies and guidance. As required by the NPPF, this document sets out who was consulted, how they were consulted, a summary of the main issues raised in the comments and our response to the comments.

1.7. This statement will be published on our website alongside the consultation documents in question and all responses received with all personal details removed.



Wimbledon town centre
extent of the masterplan area

2 CONSULTATION

HOW WE CONSULTED

2.1. The council is required in accordance with planning legislation to hold a public 6 week consultation. Engagement on the draft Future Wimbledon SPD started on 24th January 2020 until 6th March 2020.

2.2. Formal written consultation letters and emails were sent to local residents, businesses, residential groups and organisations, environmental stakeholders (e.g. Environment Agency) and other interested parties.

2.3. An email was also sent to all residents on Merton's Local Plan consultation database and to all individuals who opted in to receive updates on the Future Wimbledon project following the 2018-19 consultation.

2.4. Future Merton attended the Wimbledon Community Forum on 29th January, Stephen Hammond MP's meeting with residents on 8th February and the Wimbledon Landowner Forum, including local businesses on 26th February 2020.

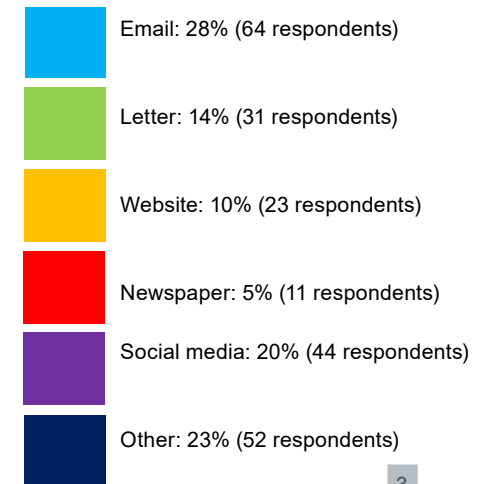
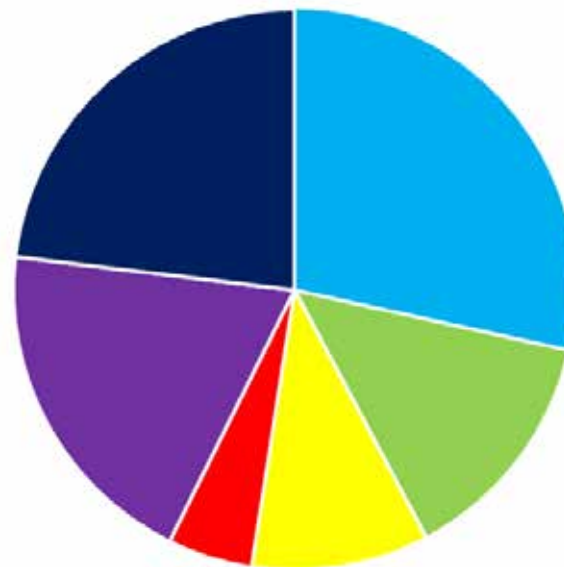
2.5. The consultation was also publicised via social media on the council's Facebook and Twitter accounts.

2.6. Those respondents who responded to the consultation via Survey Monkey told us that they heard about the draft masterplan by email, post, website, social media and "other", which included correspondence from local

residents' groups, word of mouth, Wimbledon Magazine, meetings where the council was presenting and Nextdoor. This is summarised in Figure 3.

2.7. Overall, 347 responses were received to the draft Future Wimbledon SPD consultation. More responses were received via the SurveyMonkey form (214) as opposed to letter or email (133). The questionnaire on Survey Monkey asked for the participant's views on the sections of the SPD and some demographic characteristics.

2.8. Responses that were received by email and post did not contain demographic data, however if it was stated that the respondent lived, worked or visited the borough then this was picked up in the analysis. A summary of the demography of respondents to the masterplan is provided in the next few pages.



How Survey Monkey respondents heard about the consultation where information was given

3 KEY STATISTICS

WHO RESPONDED

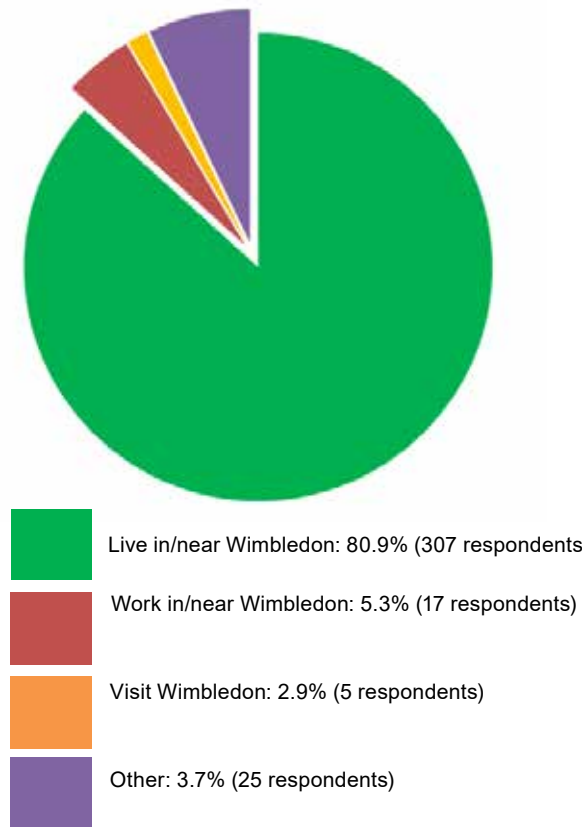
2.9. Figure 4 shows the relationship of respondents to Wimbledon town centre. The 25 respondents that answered “other” included landowners, businesses, residential/community groups and statutory consultees (for example Historic England, Greater London Authority Sport England and Metropolitan Police)

2.10. 200 respondents answered the question on gender identity, of these, 83 were male (42%), 101 were female (51%), 3 were “other” (2%) and 13 (7%) said they preferred not to say

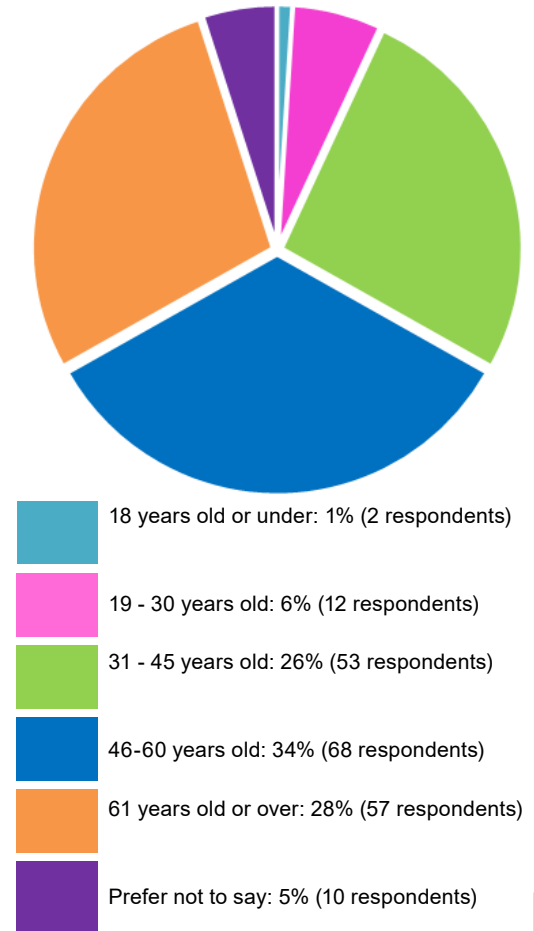
2.11. Of those who responded to the consultation 96% (192 respondents) reported no disability, and 4% (7 respondents) considered themselves to have a disability.

2.12. In the Survey Monkey questionnaire 202 respondents answered the question on age profile, of these: This data is shown in Figure 5.

2.13. Respondents to the Survey Monkey questionnaire were asked to provide details of their ethnicity. 176 respondents provided an answer to this question. The majority, 89% of respondents identified themselves as White-English/Welsh/Scottish/Northern Irish/British. The remaining responses were split between White-Irish (3%), Asian or Asian British (2%), Indian (1%), Pakistani (1%), Bangladeshi (1%), Chinese (1%), and Mixed/multiple ethnic groups: White and Black African (1%).



The proportion of respondents who live, work, and visit Wimbledon town centre



The age profile of Survey Monkey respondents

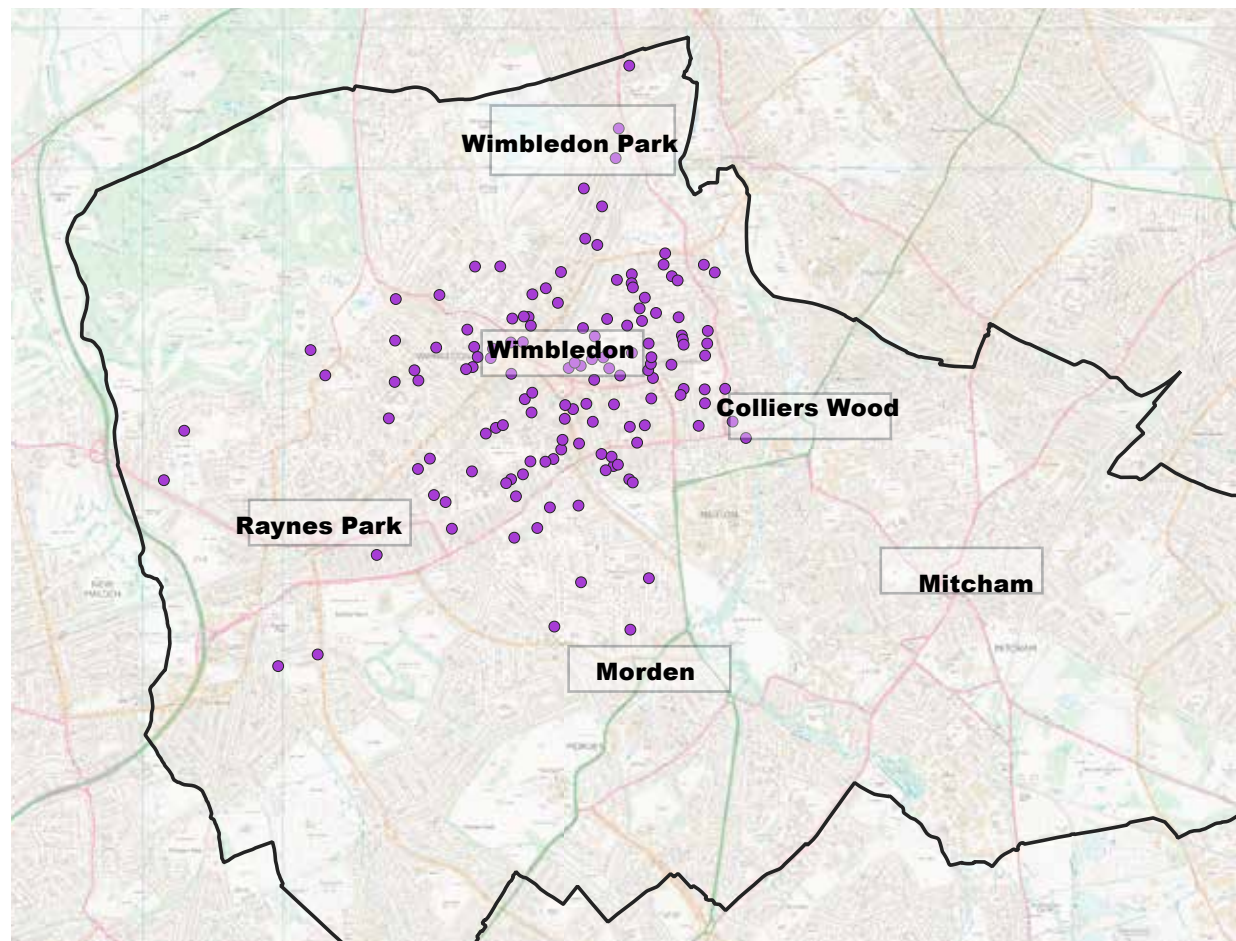
WHO RESPONDED

2.14. The map in Figure 6 shows the location of respondents to the draft Future Wimbledon SPD consultation. It shows all individual postcodes provided by respondents, where the full postcode was given. There were responses from 171 unique postcodes.

2.15. The data shows that the vast majority of respondents lived in or near Wimbledon. The postcode analysis shows that responses were received from households in Abbey, Trinity, Dundonald, Hillside, Wimbledon Park, Merton Park and Village wards, which are all closely connected to Wimbledon town centre.

2.16. The following groups provided a response to the consultation:

- Battles Area Residents' Association
- Friends of Wimbledon Town Centre
- John Innes Society
- Queen's Road Residents' Group
- Wimbledon Society
- Merton Cycling Campaign
- Love Wimbledon



© Crown copyright [and database rights] (2020) OS (London Borough of Merton 100019259, 2020)
OS MasterMap Imagery Layer has been created using OS's own imagery and imagery from other suppliers.

Quotes

4.6. *“With the up and coming Crossrail and tram extension, Wimbledon will be even more used as a major centre. Opportunities for a major transport hub (multi-modal) will have to be met and the pairing demand for offices/homes/retail and/or restaurants. A great meeting point for people, less intense than Clapham which is a near neighbour. Closer to London and more connections than places like Kingston” (Wimbledon resident aged 19-30 years)*

4.7. *“It is clearly written and explains that this is a framework for future development. But I feel the heavy emphasis on business development and facilities for visitors means the needs of local residents for a pleasant place to shop in , walk through and live in have been somewhat neglected.” (Wimbledon resident aged 61+ years)*

4.8. *“I think you should have said that Wimbledon town centre is a result of a lack of planning and that now The council are attempting to be more strategic and to try to create a plan to control and encourage future development” (Wimbledon resident aged 61+ years)*

4.9. *“useful to see how the plan fits in with current policy. A great focus on design. What about the climate emergency?” (Wimbledon resident aged 18 or under)*

4.10. *“We should not be encouraging the provision of MAJOR office development above the shopping centre. This is looking as if it will lead to high rise and Croydon esque buildings. Not what Wimbledon needs. I am not sure that Wimbledon needs its own conference venues, nor significantly more hotels” (Wimbledon resident aged 46-60 years)*

4.11. *“The plan states that “growth and development is inevitable”, but contains no economic rationale or analysis to justify this assumed growth. In reality, there is little evidence of demand for more office space in Wimbledon, with much current space actually vacant. The whole emphasis of the plan is on Wimbledon as a commercial centre; residents’ interests are barely mentioned.” (Wimbledon resident aged 61+ years)*

4.12. *“We strongly agree that the Council seeks to provide developers with further clarity and guidance on future growth within Wimbledon Town Centre. In order to enable the area surrounding Wimbledonstation to become a major destination, it is essential that growth is encouraged and facilitated to make sites in this area viable, adaptable and attractive to the businessmarket so that they are encouraged to come forward. We strongly agree that in addition to offices, other commercial uses as well as housing will be necessary, and so the planning guidance of this document should be flexibly drawn to encourage sites to come forward for redevelopment.” (Wimbledon landowner)*

Response to the comments

4.13. The introduction section of the SPD is largely factual. It outlines the purpose and status of the plan, the relevant policies and policy documents.

4.14. The concerns regarding pressure on local infrastructure are not something that is addressed through an SPD. As part of the Local Plan process there is a borough-wide Infrastructure Needs Assessment which determines what investment is required as a result of population growth and development.

4.15. The dependence of the SPD vision on Crossrail 2 was mentioned in the 2018-19 consultation. In the 2020 version the document divided the developments into three phases to illustrate the change in the short, medium and long (with Crossrail 2) vision.

Suggested changes

4.16. Following careful consideration of the comments on the Introduction, these changes have been made to the SPD:

- Add a statement on the council’s declaration of a Climate Emergency and the commitment to tackle climate change.
- Refer to the extensive consultation process that has shaped the SPD.

5 FEEDBACK: HISTORY OF WIMBLEDON

Analysis

5.1. 188 responses were received on the section History of Wimbledon, and 65 comments. Overall 44% of respondents agreed with the content, 40% neither agreed or disagreed and 15% disagreed (Figure 9).

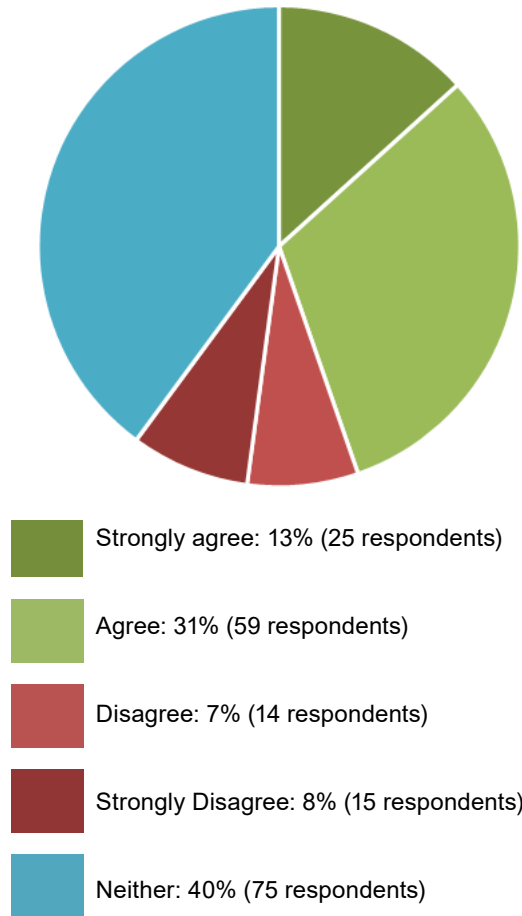
5.2. The comments received were largely a recognition of the history of Wimbledon and its importance to local people. Of those who disagreed, there was concern that the vision for Future Wimbledon would result in heritage assets/heritage character of the town centre being damaged.

5.3. The word cloud in Figure 10 provides a summary of the 150 most used words in all of the responses relating to the History of Wimbledon.

Quotes

5.4. *“Comprehensive history of Wimbledon town centre.” (Wimbledon resident aged 46-60 years)*

5.5. *“The Victorians have left us some attractive buildings in Wimbledon such as the library and the ‘bank buildings’. These will be diminished by being surrounded by tall, ugly blocks and the character of the area, partly informed by its heritage will be ruined” (Wimbledon resident)*



Responses to the History of Wimbledon section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to the History of Wimbledon

5.6. *“Very informative though there is no indication as to the good examples of design and build over the years. No reflection on the piecemeal approach to development and how that has shaped Wimbledon town.” (Wimbledon resident aged 46-60 years)*

5.7. *“Clear recognition that the historic rich heritage and green spaces in what represents the charm of Wimbledon” (Wimbledon resident)*

5.8. *“The historic context is really important for local homeowners and the heritage needs to be retained. We clearly need to develop into the future and update but not to lose the lovely historic buildings that are already here.” (Wimbledon resident aged 46-60 years)*

5.9. *“I never realised how unhistoric modern day Wimbledon really is!” (Wimbledon resident aged 19-30 years)*

5.10. *“We very much support the improved focus on Wimbledon’s heritage; this will strengthen the SPD and help create locally distinct, high quality spaces. The SPD represents heritage well throughout and not simply as a standalone feature. Recognising the multifaceted role heritage can play in delivering social, economic, and environmental progress is a key strand of the NPPF and we are pleased to see this set out in the SPD.” (Historic England)*

Response to the comments

5.11. It is clear that Wimbledon town centre’s historic buildings are of great importance to local residents. The Future Wimbledon SPD recognises their value and the section on Design Quality details how Wimbledon’s heritage should be respected by future development.

5.12. Concern around the protection of heritage assets was a strong part of the feedback to the 2018-19 consultation. In response the 2020 version of the SPD went into more detail on the location and protection of Wimbledon’s heritage assets. Listed and Locally Listed buildings are protected by national and local planning policy. The Future Wimbledon SPD goes further to identify other period buildings that contribute positively to the character of Wimbledon, for example Victorian terraces on The Broadway.

5.13. In their representation, Historic England, supported the improved focus on Wimbledon’s heritage throughout the document. Historic England are consulted on any developments that come forward in the vicinity of heritage buildings as part of the planning process.

Suggested changes

5.14. Following careful consideration of the comments on the History of Wimbledon section these changes have been made to the SPD:

- Include a narrative on the good examples of design and build over the years and how the piecemeal approach has shaped Wimbledon town.

6 FEEDBACK: WIMBLEDON TODAY

Analysis

6.1. There were 193 responses received regarding the section on Wimbledon Today and 71 comments. 41% agreed and 31% neither agreed or disagreed, leaving 28% disagreeing with the content (Figure 11).

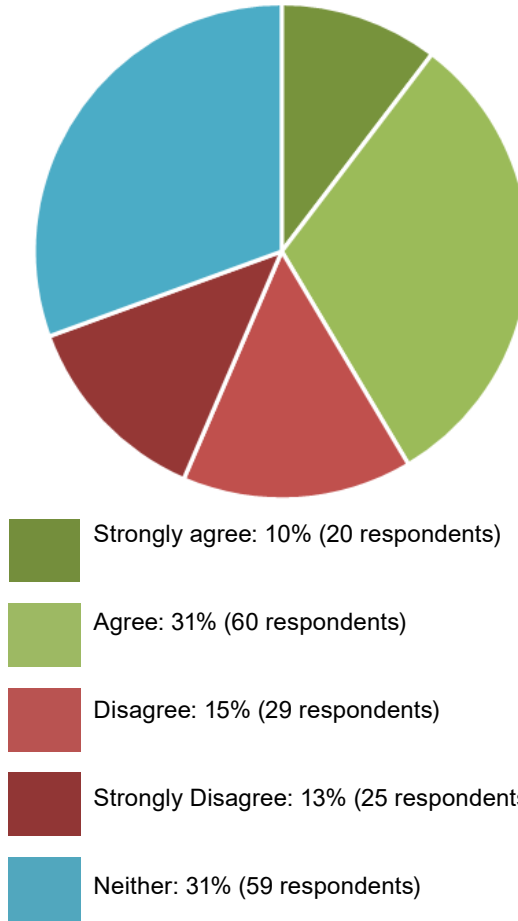
6.2. It was largely agreed that this section of the SPD is factual, and the majority of the comments were about increasing emphasis on the value of independent retailers, the Climate Emergency, greater provision for culture and entertainment and the future of retail.

6.3. Those who disagreed with this section said that Wimbledon was predominantly a residential area and there should be less focus on commercial growth, particularly offices, in the town centre.

6.4. The word cloud in Figure 12 provides a summary of the 150 most used words in all of the responses relating to the Wimbledon today section.

Quotes

6.5. *“I can see the attraction of businesses relocating out of central London to Wimbledon. But I think to maintain the identity of Wimbledon being a town where people live the number, design and height needs to be carefully managed and controlled.” (Wimbledon resident aged 46-60 years)*



Responses to the Wimbledon Today section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to Wimbledon today

6.6. *“Wimbledon today is a busy suburb of London and already there is much traffic of vehicles and people. It would be great to have more bicycle paths and pedestrian areas and fewer roads and cars, trucks and heavy vehicles.” (Wimbledon resident aged 46-60 years)*

6.7. *“You need to ensure that Wimbledon becomes sustainable and with a new urban plan you have the opportunity to make Wimbledon carbon neutral” (Wimbledon resident aged 46-60 years)*

6.8. *“Wimbledon today is a good town centre with a potentially strong brand. But it is rather ‘chain’ led and much of the shopping offer could be found anywhere. This isn’t really the councils job to manage, landowners need to be more creative and flexible to keep the town centre dynamic and enjoyable.” (Wimbledon resident aged 19-30 years)*

6.9. *“Wimbledon has always been seen as one of the more pleasant areas of London with quite a lot of greenspace, some historic buildings and older quality residential areas, enough shops, offices providing employment, attractions for day and night including the world famous tennis and transport links to enable residents and outsiders to come and enjoy it all.” (Wimbledon resident)*

6.10. *“We strongly agree that there is a demand for new office space within*

Wimbledon Town Centre. Planning policy should be drafted to encourage new office floorspace to come forward.” (Wimbledon landowner)

Response to the comments

6.11. The fact that the SPD has a commercial focus was a common response received in the 2018-19 consultation. It was clarified that this was because the SPD boundary covers the town centre, and is intended to guide development proposals on sites within the town centre. We recognise that Wimbledon is an attractive residential area, and that this should be maintained in the future.

6.12. Many respondents agreed with the vision to improve the town centre offer. The section of the SPD on The future of the high street outlines in detail the vision for retail, office, culture and entertainment in Wimbledon town centre.

Suggested changes

6.13. Following careful consideration of the comments on the section Wimbledon today, these changes have been made to the SPD:

- Include an ambition to engage a younger audience in art fairs and events, like the Wimbledon Piazza markets, as somewhere to support and promote local artists.

- Update the statistics on office occupancy and shop vacancies in the town centre.
- More narrative on the future of retail. This will also need to include a COVID update.
- More mention of independent businesses in the town centre.
- Description of what factors will attract businesses and what competitive advantages Wimbledon has relative to other outer London locations.
- Recognition that the town centre needs to be more creative and flexible to be dynamic and enjoyable.
- More about the preparedness for climate change and the shift to being carbon-neutral by 2050.

buildings. I don't think it's an issue. Done right taller buildings can be woven into the town and create more spaces for businesses and residents to keep the town thriving." (Wimbledon resident aged 19-30 years)

7.5. *"Agree building heights and design, help for independent shops and public green spaces all need to be a priority." (Wimbledon resident aged 31-45 years)*

7.6. *"I agree that you consulted residents and that you have accurately described that process. However, I am not sure you have listened to the comments. The tall building on Hartfield Road is an example. Residents made clear they did not want high rise in Wimbledon." (Wimbledon resident aged 46-60 years)*

7.7. *"It is also evident that extensive community engagement has been undertaken to inform the draft SPD, which [...] provides a sound basis to determine future planning applications within the Town Centre, providing added confidence for stakeholders, including our Client, seeking to deliver the aims of the SPD." (Wimbledon landowner)*

7.8. *"It would be very much better if you actually took notice of residents' suggestions. The YMCA has done well here, and its latest proposals are a massive improvement which will enable local people to interact with the space." (Wimbledon resident aged 61+ years)*

7.9. *"We are pleased to see that the Final Consultation Draft has been amended to address comments received on the previous draft, in particular: An indication of how development will phased in the period up to 2040; The inclusion of a more detailed section relating to delivery and implementation. We are also pleased to see that the Masterplan is now referred to as a 'Vision' which we consider to be more appropriate and that some further guidance on heritage and design has been provided." (Residents Association)*

Response to the comments

7.10. Since the launch of Future Wimbledon in 2017 the consultation process has accorded with the guidance in the NPPF. Approximately 2,000 responses have been considered during this period. In response to feedback the January 2020 version of SPD was altered to:

- include more detail on design quality and protection of heritage assets
- divided the document into three phases to illustrate the gradual development of the town until 2040+
- reduced the proposed building heights and massing, increasing spaces between buildings for public realm improvements
- a greater emphasis on greening and sustainability in the context of Merton

declaring a Climate Emergency

- adding a section on delivery to stipulate how the aspirations of the SPD can be delivered through specific workstreams and projects.

7.11. The majority of concerns highlighted in comments on the engagement section relate to other parts of the SPD, namely building height, sustainability and the future of the high street. These comments have been addressed in the relevant parts of this consultation report.

Suggested changes

7.12. Following careful consideration of the comments on the engagement section these changes have been made to the SPD:

- Updating the Delivery section of the plan to highlight the methods for continued engagement of local residents groups. As development proposals emerge it will be the responsibility of applicants to engage with residents early on in the design process. A good example of this is the YMCA proposals on The Broadway, of which many residents are complimentary.
- The council will consult on proposals for public realm improvements, giving stakeholders an opportunity to shape the designs.

8 FEEDBACK: FUTURE WIMBLEDON

Analysis

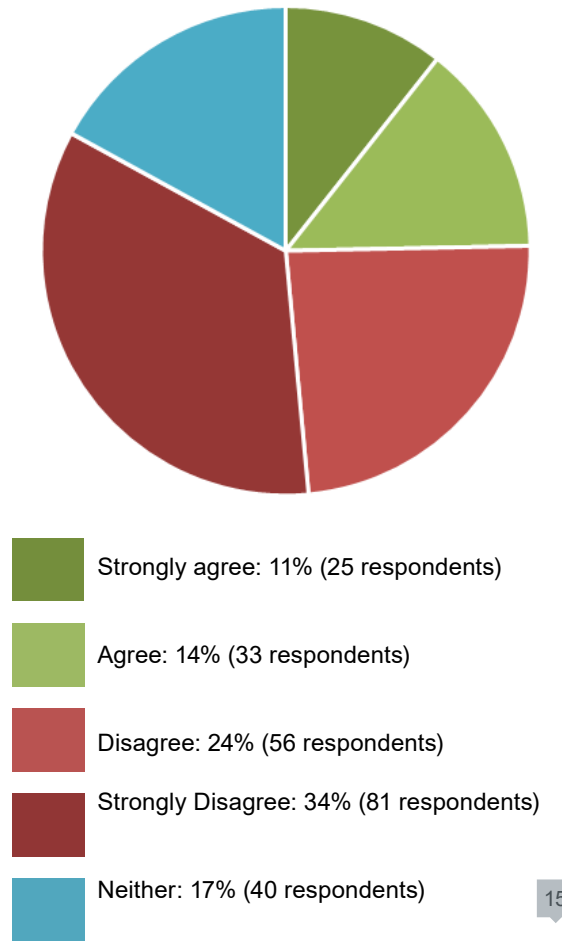
8.1. The section of the SPD on Engagement received 235 responses with 153 comments. The majority (58%) disagreed with the Future Wimbledon vision, 25% agreed and 17% neither agreed or disagreed (Figure 15)

8.2. The predominant reason for respondents to disagree with this section of the SPD was proposed building heights. There were concerns about the protection of heritage assets of Wimbledon town centre, the reliance on CR2 and the emphasis on new office development.

8.3. The vision for urban greening and sustainability, improving the retail offer, detailed design guidance and the protection of heritage assets were positively received. Some respondents proposed that the Climate Emergency feature more predominantly as part of the vision.

8.4. Landowners and Love Wimbledon BID strongly agreed with the aspiration to increase Wimbledon's commercial offer, including increasing office space to support the town's retail offer.

8.5. The word cloud in Figure 16 provides a summary of the 150 most used words in all of the responses relating to the Future Wimbledon section.



Responses to the Future Wimbledon section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to Future Wimbledon

Quotes

8.6. *“I Like the priorities set out and the phasing of development images. The images of future Wimbledon are great to give life to the vision. I really like the way this section is presented and the different maps to show different aspects the priorities are focused on.” (Wimbledon resident aged 19-30 years)*

8.7. *“Good to see lots on green space and places for people. Good that building heights have been reduced.” (Wimbledon resident aged 46-60 years)*

8.8. *“All looks ok except for the building heights. Wimbledon does not need 14 story buildings, and it will ruin the heritage and character of the town centre. A maximum of 6 or 8 stories seems more suitable, and then scaled down similar to the existing plan. Quality design must also be emphasised.” (Wimbledon resident aged 31-45 years)*

8.9. *“While I am pleased at the plan’s emphasis on high quality design and building materials, there is very little detail overall and by taking a site by site approach to development, it could open the door to massive and piecemeal over-development of the town centre.” (Wimbledon resident)*

8.10. *“Concerned that the proposed building heights are too high for the town centre. I accept that there is limited lateral space so*

growing vertically seems to be the option. However, after Crossrail 2, could we not build mid height buildings over the railway line? This would reduce train noise locally.” (Wimbledon resident aged 46-60 years)

8.11. *“Please refer to my comments above. Whilst I agree with some of the objectives I disagree with the imposition of tall buildings and would query their necessity.” (Wimbledon resident aged 61+ years)*

8.12. *“The draft SPD offers the opportunity to create and implement a more structured plan for the town centre, focused around the station area, and seeks to address some of the long-standing issues of development, renewal and transport, whilst linking investment in public spaces to support the growth of the town centre.” (Wimbledon landowner)*

8.13. *“Significant, detailed, work that has been undertaken in the evolution of the document to-date and both commends and supports the overall principle of the vision shown by the Council and the aspiration to deliver a vibrant, and importantly viable, town centre, that can compete within the wider region.” (Wimbledon landowner)*

Response to the comments

8.14. The responses received in this section were largely positive in relation to all aspects of the vision, with the exception of building

heights. This has been the case throughout the Future Wimbledon process and following the 2018-19 consultation overall building heights in the document were lowered.

Suggested changes

8.15. Following careful consideration of the comments on the Future Wimbledon section these changes have been made to the SPD:

- A greater emphasis throughout the document on the measures required in response to the council’s declaration of a Climate Emergency.
- A review of the balance between emphasis on commercial and residential development within the town centre. This includes the acknowledgement of the potential for residential development on upper floors of new commercial premises to create more flexibility and resilience within the town centre.
- Removal of the scenario once Crossrail 2 has been delivered. This includes the development proposed over the railway tracks, which included the tallest buildings.

9 FEEDBACK: DESIGN QUALITY

Analysis

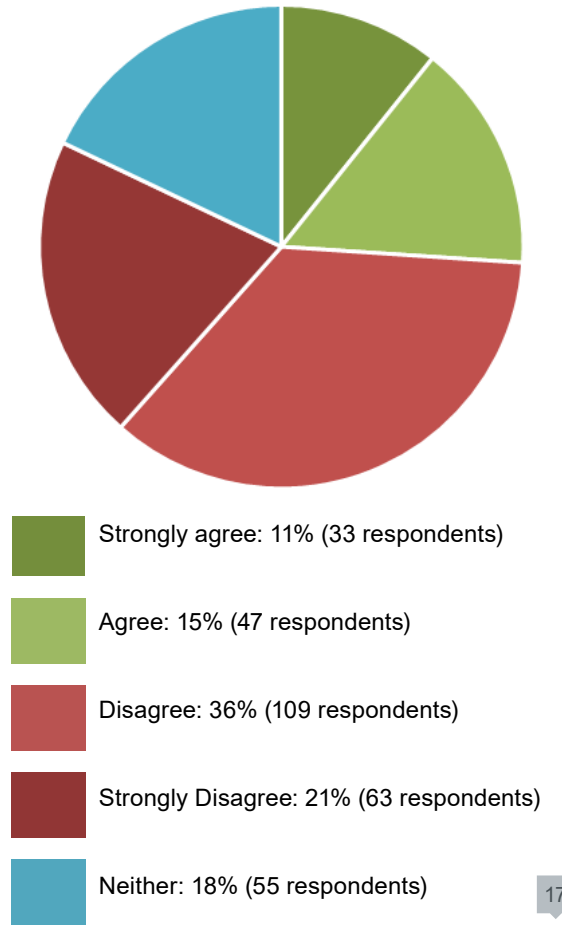
9.1. The section of the SPD on Engagement received 307 responses with 224 comments. The majority (56%) disagreed with the Future Wimbledon vision, 26% agreed and 18% neither agreed or disagreed (Figure 17).

9.2. The majority of comments received made specific reference to proposed building heights. Similarly to the 2018-19 consultation local residents do not support taller buildings in Wimbledon town centre. The most common proposed maximum building height amongst residents ranged from 6 to 10 storeys.

9.3. There was still concern that the SPD provided insufficient protection for Wimbledon's heritage assets. However, the SPD is guidance and any development proposals must be in accordance with local, regional and national planning policies, which provide protection for listed and locally listed buildings.

9.4. The greater detail on design quality was well received, as well as the greater emphasis on protecting Wimbledon's heritage. This section also looks to encourage developments that respect and enhance the existing character of Wimbledon town centre.

9.5. The word cloud in Figure 18 provides a summary of the 150 most used words in the responses relating to the Design quality section.



Responses to the Design quality section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to Design quality

Quotes

9.6. *“Agree completely with the ambition of high quality buildings with Wimbledon’s character in mind when choosing materials and structure. Key to making the town cohesive. The urban design section is very informative and interesting. Scale and massing will be very important in Wimbledon to successfully merge with the surrounding low residential areas. Trust the council to conduct building heights in an appropriate manner and successfully increase the height towards the centre. Public interface is key with new developments.”* (Wimbledon resident aged 19-30)

9.7. *“Greater restriction on height of buildings You are in danger of creating “canyons” of high rise office blocks”* (Wimbledon resident aged 61+ years)

9.8. *“Lots of good things in here about scale, micro-climates, people friendly etc. Didn’t see anything about use of sustainable materials for construction, nor about an assumption that all new buildings should be substantially or wholly powered by sustainable means eg solar panels on roofs. I think these are vital eg so we don’t keep heating our local climate with things like air conditioning units.”* (Wimbledon resident aged 46-60 years)

9.9. *“We agree that tall buildings and high-density redevelopment should be*

encouraged in the town centre. We agree with the guidance on building heights and the Council’s emphasis on the importance of high quality design that minimises the impact on the surrounding context. We agree that the guidance on building heights should not be “over-prescriptive”. However, it should be clearly established whether this is a minimum or maximum parameter to ensure clarity and consistency of policy outcomes. To ensure that Wimbledon Town Centre remains future-proof, we suggest that criteria setting out the circumstances in which new developments can exceed the tolerances identified in the SPD, be defined and clearly set out.” (Wimbledon landowner)

9.10. *“Agree except for the section on building heights. Too much density and height. I think it would cast a shadow over the remainder of Wimbledon and devalue the aesthetics of the community/greening/leisure areas.”* (Wimbledon resident aged 46-60 years)

9.11. *“See above - sympathetic design is extremely important given the mix of beautiful buildings in the town centre and the need for any new buildings to fit in.”* (Wimbledon resident aged 31-45 years)

9.12. *“I am strongly opposed to any development of Wimbledon town centre which leads to any increase in the height of buildings in Wimbledon. No building should be allowed*

to be any taller than it is at the moment. Any building replacing an existing building should be no taller than the building that was on that site.” (Wimbledon resident aged 31-45 years)

9.13. *“The proposal to allow buildings up to 14 storeys in height is completely unacceptable and would permit development contrary to Wimbledon’s whole heritage and character. Even in the St George’s Road area such tall buildings would be oppressive and would tower over neighbouring residential streets. This idea negates all the positive points in this section regarding high quality design and materials.”* (Wimbledon resident aged 61+ years)

9.14. *“Good quality architecture is very important Buildings should be built to last 50 years plus”* (Wimbledon resident aged 46-60 years)

9.15. *“I understand that London has to grow and I can see that the plan is not trying to copy Canary Wharf or Croydon, 14 stories is a leap for Wimbledon but is realistic as it is a main town centre and Morden and Collier’s wood already have taller buildings.”* (Wimbledon resident aged 19-30 years)

9.16. *“Design review panels should become a staple of Wimbledon planning decisions, even for smaller developments. It’s truly the easiest way to ensure quality.”* (Wimbledon resident aged 31-45 years)

9.17. *“The guidance is overly rigid in designating blanket height limits across the proposed neighbourhoods. If this is meant to be a guide, then the Masterplan should explicitly stage degrees of flexibility and how these will be assessed, for instance and in addition to our comments regarding storey versus AOD height, market demand and viability considerations. The Masterplan should also recognise the difficulties of site assembly for some sites, given their restrictive nature and the requirement to provide a mixture of uses, especially at lower levels, plant and other servicing requirements.”*
(Wimbledon landowner)

Response to the comments

9.18. Similar to the 2018-19 consultation there still remains concerns amongst respondents about building heights in Wimbledon town centre and the impact on heritage assets. However, Historic England in their response welcomed the reduction in maximum building height from 18 storeys to 14 storeys and the improved focus on Wimbledon’s heritage throughout the document, and not simply as a standalone feature.

9.19. The focus of the objections to the Future Wimbledon SPD regarding new development and building height was on buildings higher than 8 storeys. The majority of buildings shown in the height guidance

are fewer than 8 storeys, with the exception of those adjacent to the railway tracks and along St George’s Road, which it was agreed was the least sensitive area for residents and heritage assets.

9.20. Historic England have sought further clarification in the SPD by providing building heights in metres and specifying how double height ground floors should be assessed.

9.21. Landowners responded positively to the design and quality section of the plan. Their main concern was that the building height guidance could be interpreted as overly-prescriptive and that more emphasis was needed on the role of viability and the merits of individual applications.

9.22. Residents were concerned about the negative effects of tall buildings on the pedestrian environment and their sustainability in the context of climate change and reducing carbon. These are all issues that are addressed in the SPD and are supported by local, regional and national planning policy.

Suggested changes

9.23. Following careful consideration of the comments on the Design quality section these changes have been made to the SPD:

- Building height guidance expressed in metres, based on the existing height of surrounding buildings and an assumption

on standard floor to ceiling heights in commercial and residential buildings.

- Review of the wording to ensure that it is not overly-prescriptive, takes into account factors including viability, and adheres to regional and national policy. More emphasis that building height specified in the SPD should not be considered mandatory and that schemes will be assessed on an individual site by site basis.

10 FEEDBACK: PUBLIC REALM

Analysis

10.1. In total 217 responses were received in relation to the Public realm section of the SPD. Of those 45% agreed with the content, 28% disagreed and 26% neither agreed or disagreed (Figure 19)

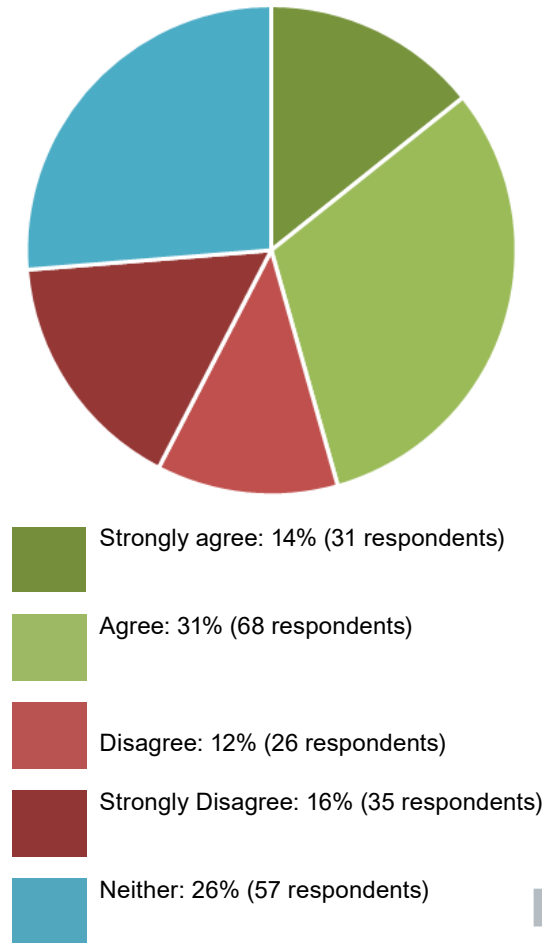
10.2. Amongst those who agreed, there was praise for the proposals to improve the infrastructure for cyclists and pedestrians, greening, and the enhancement opportunities.

10.3. There was criticism that some of the greening aspirations were not deliverable, or were not ambitious enough. For example, the survival rate of street trees was a concern, and respondents wanted more open space in the town centre.

10.4. Parking and traffic were perceived to be insufficiently covered by the SPD, in particular the traffic problem and associated air pollution in the town centre .

10.5. The height of new developments was also perceived to have a negative impact on the experience of any new public spaces.

10.6. The word cloud in Figure 20 provides a summary of the 150 most used words in all of the responses relating to the Public realm section.



Responses to the Public Realm section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to Public realm

Quotes

10.7. *“There is a welcome emphasis on creating new pedestrian links and spaces, and improving footway design. A pedestrian arcade leading off the present Piazza is proposed, but it could be a public asset if fully covered and glazed, as in the Hays Wharf galleria.” (Wimbledon Society)*

10.8. *“We need more youthful and greener streets, can we have more cycle lanes please.” (Wimbledon resident aged 18 or under)*

10.9. *“Ensure the places are well lit, green, spacious enough, can involve communities in their upkeep and usage. As council encouraging walking ensure pavements wide enough especially by bus stops eg theatre. High quality, natural street furniture, links to Wimbledon heritage, active frontages to draw people in to businesses.” (Wimbledon resident aged 46-60 years)*

10.10. *“Wimbledon needs more central open spaces and greenery. Pavements are very cluttered and difficult to navigate. Segregated cycle lanes are a very good idea; mixing with pedestrians is dangerous (most pedestrians do not pay attention to where they are walking) and many drivers are aggressive towards cyclists. Crossings over the railway line e.g. Alexandra Road to Queens Road would be a good idea (this could be pedestrian just to ease congestion in the main part of the*

station)” (Wimbledon resident)

10.11. *“Suggestions for improving pedestrian links and spaces are welcome, as is the proposal to move the emphasis from vehicles. This will make access on foot pleasanter and may help address Climate Emergency.” (Wimbledon resident aged 61+ years)*

10.12. *“I note that the SPD states that the public realm will be designed to prioritise pedestrians and improve facilities for cyclists – this is welcomed. I also note reference to the Healthy Streets Approach and its associated quality of life benefits.” (Sport England)*

10.13. *“Motor traffic volumes are currently damaging to the public realm, and the amount of space dedicated to traffic and parking makes it very difficult to make meaningful improvements. There needs to be a shift away from motor traffic and towards active travel. Roadspace should be reallocated to form new public spaces and to enable safe cycle infrastructure.” (Merton Cycling Campaign)*

Response to the comments

10.14. The majority of responses relating to the public realm were in agreement with the proposals outlined in the SPD. Similarly to the 2018-19 consultation residents are still concerned about the traffic in Wimbledon town centre. Whilst there is enthusiasm for an additional road bridge connecting Alexandra

Road and Queen’s Road it is recognised that this comes with significant challenges.

10.15. Since the start of the Covid-19 pandemic cycling has increased across London, supported by local transport improvements to cycle infrastructure. The council has submitted funding bids to improve cycling in Wimbledon, as set out in the [Active and Healthy Travel response to Covid](#) adopted by Cabinet 15th June 2020.

Suggested changes

10.16. Following careful consideration of the comments on the Public realm section these changes have been made to the SPD:

- More about facilitating community/arts/ small and individual retail and markets around the town centre.
- Add to the delivery section that clear guidance is required at the pre-application stage to assist applicants in achieving the ambitions for the public realm and avoid conflict between street trees, street furniture, pedestrian flows and servicing.
- Greater mention of the Climate Emergency as a common theme.
- More detail on proposed cycle infrastructure improvements and their delivery.

11 URBAN GREENING AND SUSTAINABILITY

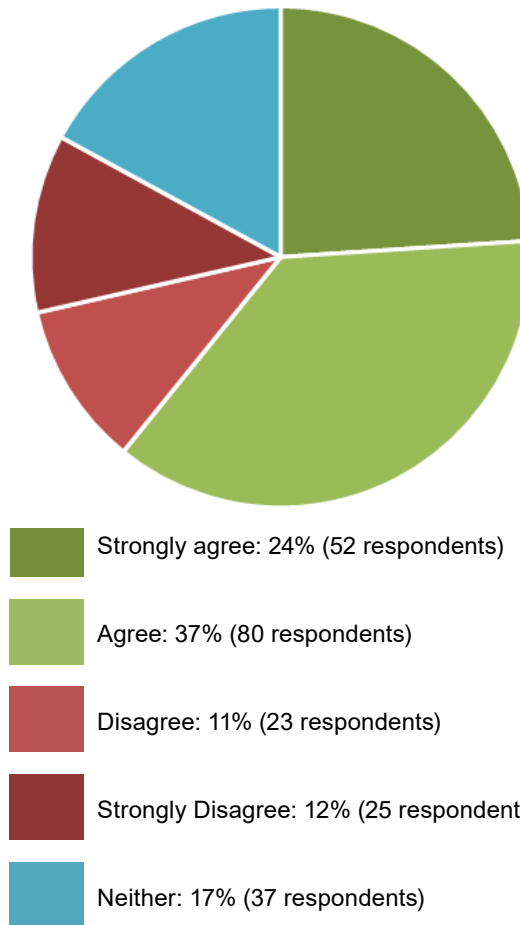
Analysis

11.1. There were 217 responses to the section on Urban greening and sustainability, and 119 comments. Of these 61% agreed with the priorities, 23% disagreed and 17% neither agreed or disagreed (Figure 21).

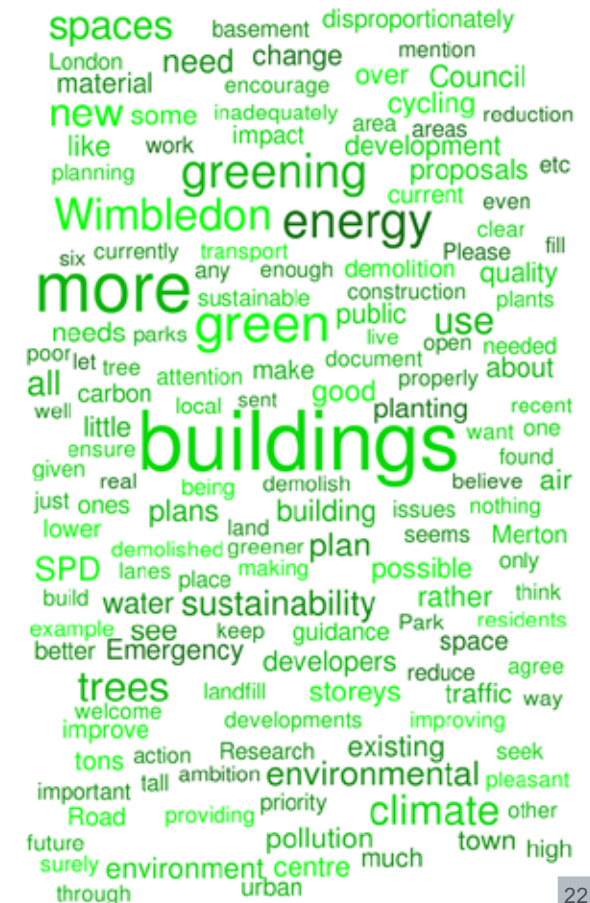
11.2. The proposals to encourage low carbon design, improve air quality and flood water management were well received. Although some respondents sought greater emphasis on the environmental benefits of extending and refurbishing buildings and avoiding demolition. This made up a large proportion of those who “disagreed” in their response.

11.3. The delivery of the ambitions within this section was questioned by respondents, who wanted stronger requirements for applicants. Some of those who disagreed did not believe that the proposals went far enough, and sought to increase the amount of open and green space in the town centre.

11.4. The word cloud in Figure 22 provides a summary of the 150 most used words in all of the responses relating to the Urban greening and sustainability section.



Responses to the Urban greening and sustainability section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to Urban greening and sustainability

Quotes

11.5. *“Very good, as far as it goes, but it should go further to include need for biodiversity, and also the environmental impact of building works themselves - materials consumed, wasted, CO2 and air quality impact of works, and all the huge amount of transport involved. So consider more work on adapting existing buildings?”* (Wimbledon resident aged 61+ years)

11.6. *“Of the highest importance. Make sure you don’t let the developers cut corners in the environmental impact of any new new buildings”* (Wimbledon resident aged 46-60 years)

11.7. *“The Plan should have strict guidance and requirements on energy and water use; recycling rain water, low energy systems, good drainage to cope with changing weather conditions etc as a standard requirement for all new buildings.”* (Wimbledon resident)

11.8. *“Our Client welcomes that the themes of sustainability and place making that underpin the draft SPD. M&G Real Estate are committed to delivering the highest levels of sustainability through their assets and are signed members of the Better Buildings Partnership.”* (Wimbledon landowner)

11.9. *“Its not clear how this plan delivers the Council’s climate emergency objectives.*

Re-use of existing buildings, like Wellington House, is surely more sustainable than re-building. Though, St Georges Rd has no active frontages due to the car park levels, so I can see why this is a problem.” (Wimbledon resident)

11.10. *“I agree that urban greening should be a huge priority as well as sustainability. However I disagree with greening at the expensive of cycling lanes.”* (Wimbledon resident aged 31-45 years)

11.11. *“As much green space, trees and landscaping as can be incorporated in future development will be very beneficial for the well being of the those that live and work in Wimbledon and creating a pleasant environment”* (Works in Wimbledon, aged 46-60 years)

11.12. *“Sustainability should be more than just being green. Responding to the various initiatives with regarding being carbon neutral by 2030/2050 should feature as an aspiration. Mentioning LETI (London Energy Transformation Initiative) published in 2020 would help to reinforce the Local plan to include low carbon as a key objective in any new building.”* (Wimbledon resident aged 46-60 years)

Response to the comments

11.13. Urban greening and sustainability are

important aspirations for Wimbledon residents who responded to the consultation. There is scope to increase the emphasis on achieving the aims associated with the council’s declaration of a Climate Emergency.

11.14. With regard to tree planting, energy efficiency and water management in new buildings developers will be required to meet the requirements of Merton’s Local Plan, the London Plan and NPPF.

11.15. In response to COVID-19 there has been more of a focus on delivery a more environmentally sustainably future through recovery. The SPD outlines a vision for supporting a sustainable future for Wimbledon town centre, which will be supported by Local Plan policies, the London Plan and national planning policy.

Suggested changes

11.16. Following careful consideration of the comments on the Urban greening and sustainability section these changes have been made to the SPD:

- More information on the benefits of refurbishing and extending existing buildings compared to demolition with relation to embodied carbon.
- Make reference to the delivery plans for achieving greening aspirations.

12 FUTURE OF THE HIGH STREET

Analysis

12.1. Overall 259 responses and 160 comments were received in relation to the section Future of the high street. Of these, 33% agreed with the SPD, 38% disagreed and 28% neither agreed or disagreed (Figure 23).

12.2. There was support for the provision of more independent retail and affordable workspace and retail premises in the town centre from both residents and landowners.

12.3. The main criticisms were the level of office growth shown in the document and the perceived lack of support/certainty for the concert hall.

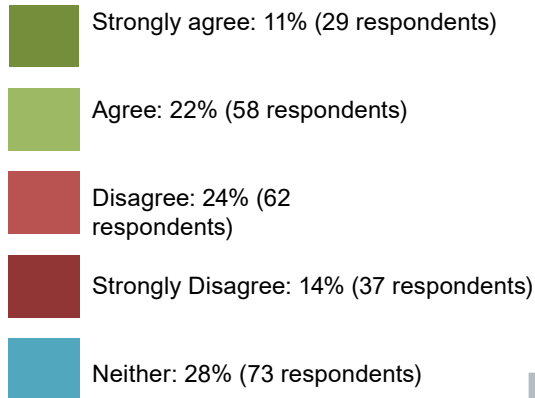
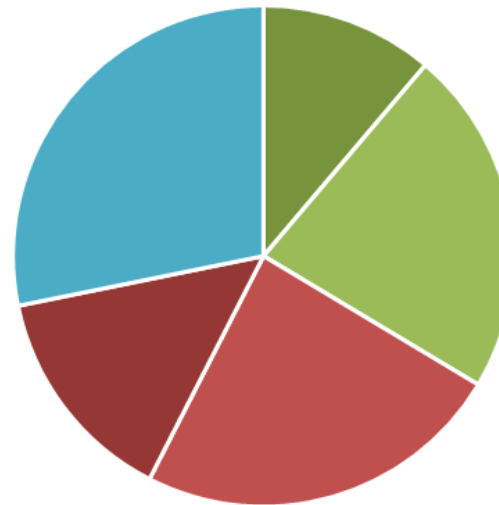
12.4. The word cloud in Figure 24 provides a summary of the 150 most used words in all of the responses relating to the Future of the high street section.

Quotes

12.5. *“Flexible retail, market and pop ups to help independent retails all good ideas.” (Wimbledon resident aged 31-45 years)*

12.6. *“Sensible recognition of the changing nature of the average high street.” (Wimbledon resident aged 61+ years)*

12.7. *“We agree that the development of major offices along Worple Road should be*



Responses to the Future of the high street section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to Future of the high street

promoted and supported. However, flexibility should be retained to allow mixes of use in response to market demand and to achieve public benefits such as maintaining active frontages at ground floor level.” (Wimbledon landowner)

12.8. *“I have not seen any hard evidence to show that businesses are looking to open offices in the town. However, I am all in favour of developing sites for local retail outlets, especially independent businesses and market stalls.” (Wimbledon resident)*

12.9. *“the supply of office space within Wimbledon is extremely limited with few vacancies available and that the majority of available space in the Town Centre is refurbished 1980s stock, with very limited Grade A availability. Being able to attract new businesses to the town centre and successfully compete against other centres in the region is considered key for the future success of the town centre. It is our Client’s assertion that delivery of new office floor space, particularly when characterised by large floor plates, and delivered to a Grade A standard, is critical in broadening the offer of the centre and attracting investment and high quality new tenants.” (Wimbledon landowner)*

12.10. *“It is considered a flexible approach to land use, particularly at lower levels of buildings, is the most appropriate away for the SPD to ensure it remains robust and relevant*

in the future, and allows the town centre to remain competitive and react to market conditions and market trends going forward.” (Wimbledon landowner)

12.11. *“The SPD makes a non-committal reference to a Concert Hall for Wimbledon. I would like to see a Concert Hall and greater provision of creative and performance arts activities. The SPD mentions the night-time economy and the need for balance in terms of addressing the negative impacts such as noise, disturbance and anti-social behaviour. I agree with this. There are a number of residential streets leading on to the town centre and it is important that residents are not disturbed by drunken revellers.” (Wimbledon resident aged 46-60 years)*

12.12. *“Fully support a mix use of the town centre and of mixed unit sizes to house smaller independent brands, as well as chains. In regards to the proposition of a concert venue being proposed (in the Morrisons car park?), an investment so huge would have to have serious viability considerations behind it. And honestly, with the other entertainment facilities in the area, it doesn’t seem a correct fit to me. The people suggesting this seem to be the same people not wanting the residential areas to be disrupted....which doesn’t exactly fit with a concert hall. Not to mention the possible physical ‘barrier’ it would create to the town centre.” (Wimbledon resident aged 19-30 years)*

12.13. *“With new technologies and more flexible ways of working the need for vast amounts of office space and/or shopping complexes has changed; these factors should be taken into consideration before building for the sake of building” (Wimbledon resident)*

Response to the comments

12.14. Since the 2018-19 consultation the Future Wimbledon SPD removed the aspiration for Wimbledon to become a Metropolitan Centre. The January 2020 version of the plan shows reduced levels of commercial growth. Whilst there are still concerns amongst residents about the evidence for this, it is clear from landowners and Love Wimbledon BID that growing the Grade A office stock is vital in retaining existing companies and attracting new tenants to the town centre.

12.15. Since the consultation Covid-19 technological change has transformed workplaces. Amongst experts there are competing views on the future of workplaces, but it is clear that remote working is here to stay. Research by King’s College London has suggested that the trends of remote working might be accompanied by increased demand for office accommodation, including flexible workspace, in London suburbs as part of a de-centralised pattern of growth in the future.

12.16. The future of the high street is a

pertinent topic as we plan for recovery post-Covid. Encouraging flexibility of uses and making provision for independent retailers, start-ups and creative businesses will be important for Wimbledon town centre. These changes are supported by the flexible planning policies introduced by central government to support town centres.

12.17. The Covid-19 pandemic has accelerated trends affecting high streets, in particular the growth of the digital economy with online shopping, cashless transactions and home delivery dining apps.

12.18. Research has also suggested that Covid-19 may have changed people's priorities towards health, happiness and social connection over consumerism. Wimbledon town centre, along with other outer London suburbs saw a boost as more time and money was spent in local shops, whilst spending in central London was suppressed.

12.19. The SPD supports a place-based approach for improving the resilience of Wimbledon town centre. This includes creating spaces for community and connection with more markets, green spaces, places for cultural activity, and flexible retail units and workspaces.

12.20. Similarly to the 2018-19 consultation the concert hall proposal received both support and opposition from local

residents. The SPD recognises the positive contribution of culture and entertainment to the town centre. Merton Council actively supports Merton Arts Space, Bookfest, Wimbledon International Music Festival, the redevelopment of the Polka Theatre and public realm improvements in St Mark's Place and outside Wimbledon Theatre.

Suggested changes

12.21. Following careful consideration of the comments on the Future of the high street section these changes have been made to the SPD:

- Review the existing land uses map to make more accurate reference to the range of uses across the town centre. The vision is for Wimbledon town centre to be flexible and mixed use and the map does not accurately reflect that ambition.
- Include a section on the future of shopping and workplaces in light of the Covid-19 pandemic, which has accelerated these trends.

13 THE STATION AND RAILWAY

Analysis

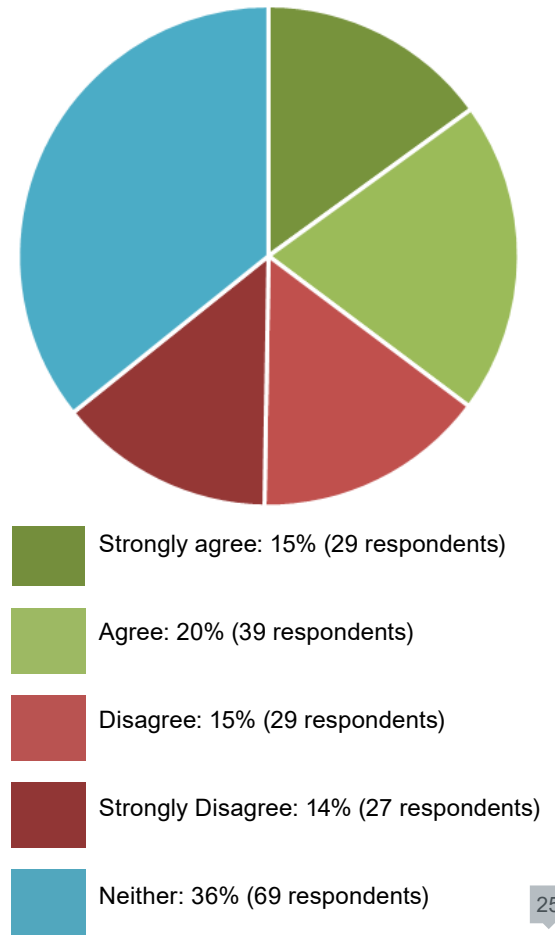
13.1. 193 responses and 97 comments were received in relation to the section on the Station and railway. Of these 35% were in agreement, 29% disagreed and 36% neither agreed or disagreed (Figure 25).

13.2. The key issues for respondents in this section were the uncertainty of Crossrail 2, the need to increase the capacity of Wimbledon station, and the opportunity for building over the tracks.

13.3. Some comments attributed the level of commercial growth in the plan to Crossrail 2 and saw the uncertainty of the project given the status of Crossrail 1 and HS2 as a reason to plan for less growth. There were concerns about the effect of the construction of Crossrail 2 on the town centre.

13.4. Those who agreed with the section saw the opportunities of additional crossings over the railway, investment in the station and building over the railway tracks.

13.5. The word cloud in Figure 26 provides a summary of the 150 most used words in all of the responses relating to the Station and railway section.



Responses to the Station and railway section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to the Station and railway

Quotes

13.6. *“Big fan of over rail development and of Crossrail 2.” (Wimbledon resident aged 31-45)*

13.7. *“Wimbledon station is too busy at rush hour, cannot wait for Crossrail 2” (Wimbledon resident aged 18 or under)*

13.8. *“Like the idea of building over the railway lines where possible to increase space. But not at the expense of buildings that are too high....” (Wimbledon resident aged 46-60 years)*

13.9. *“Good sound objectives and aspirations but more bridges that harm residential areas is a no no.” (Resident aged 61+ years)*

13.10. *“I like the idea about covering over the rails and building gardens and buildings (max 6 store high). It will reduce the noise from the trains and utilise the area better. Plus may ease some of the traffic in the High Street.” (Wimbledon resident aged 46-60 years)*

13.11. *““The plan to develop the station is great, but really needs Crossrail 2 through the town. I sincerely hope that it goes ahead and all the people objecting do not get listened too. Having a huge national infrastructure project and the development that will bring to the area is an opportunity that cannot be allowed to slip away because of a few “luvvies” worried*

about some building work for a few years!” (Wimbledon resident aged 31-45 years)

13.12. *I think we shouldn’t put any reliance on Crossrail 2 in the planning - likely not to happen for at least 30 years at best.” (Wimbledon resident)*

13.13. *“The parade of shops to the right of the station entrance should be kept - just smarteend up - as should the portland stone station entrance. These are quality buildings and part of the history of the town centre at a nice human scale. You should not be considering taking them down.” (Wimbledon resident aged 46-60 years)*

Response to the comments

13.14. The responses received in the 2018-19 consultation included uncertainty of Crossrail 2, the effect of its construction on Wimbledon town centre and the dependence of the SPD on its delivery.

13.15. In the January 2020 edition of the SPD the vision was divided into three phases to show what the development of the town could look like independent of Crossrail 2.

13.16. The council continues to work closely with Network Rail and Crossrail 2 on options to increase capacity at Wimbledon station regardless of the timetable for Crossrail 2.

13.17. Over-railway development is an opportunity to add crossings over the railway and build new neighbourhoods over the tracks. We recognise that there are challenges associated with this type of development, particularly viability. The next version of the SPD has removed the over-track development, which included the tallest buildings proposed for the town centre.

Suggested changes

13.18. Following careful consideration of the comments on the Station and railway section these changes have been made to the SPD:

- Review the uncertainty of Crossrail 2 and consider removing dependent developments from the overall vision.
- Keep the emphasis on increasing the capacity of the station in the short term to address overcrowding.

14 DELIVERY

Analysis

14.1. 168 responses and 64 comments were received in relation to the delivery section of the SPD. 31% of respondents agreed, 30% disagreed and 39% neither agreed or disagreed (Figure 27).

14.2. It was agreed that an overall plan is needed for Wimbledon town centre.

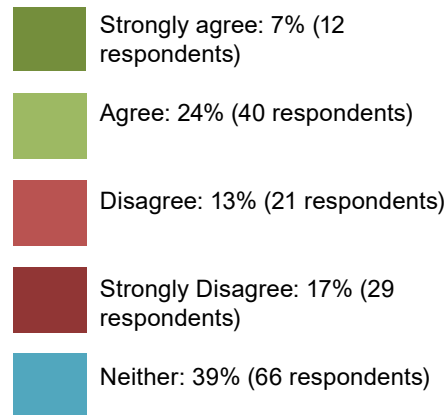
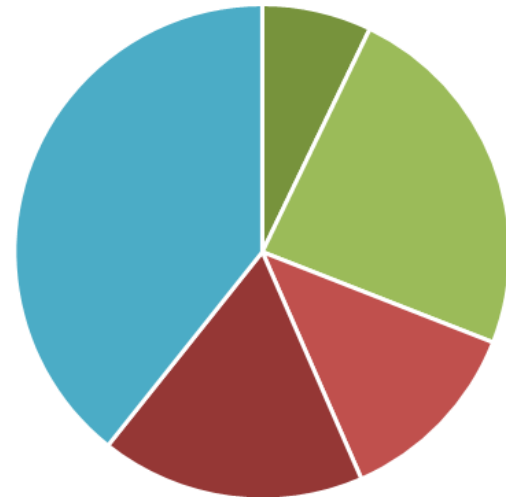
14.3. The comments from those who disagreed raised the issues of uncertainty around Crossrail 2 and the dependence of the vision on its delivery, the sustainability of the proposals

14.4. The word cloud in Figure 28 provides a summary of the 150 most used words in all of the responses relating to the Delivery section.

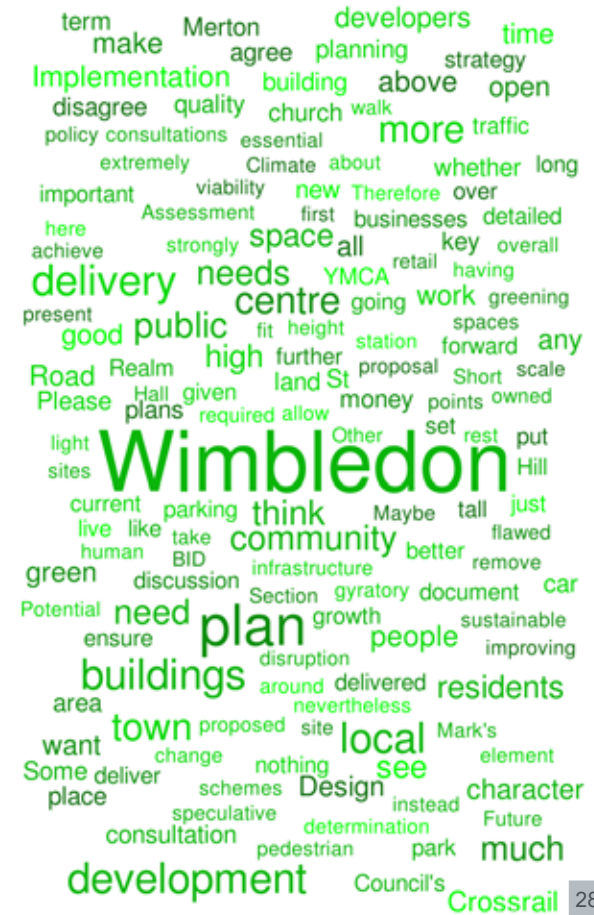
Quotes

14.5. *The objective of the draft SPD to assist in the delivery of good growth and guide developers and investors in making Wimbledon Town Centre a more attractive and successful location is supported and is considered to add confidence to the market to deliver further investment in the area.* (Wimbledon landowner)

14.6. *“some good practical ideas for developments in various places in the centre - though most of the new green spaces are in*



Responses to the Delivery section of the Future Wimbledon SPD



Depiction of the most frequent words used in response to Delivery

practice extremely small - with the exception of the new green walkway up Wimbledon Hill to the village!" (Wimbledon resident aged 61+ years)

14.7. *"We strongly agree that new development within Wimbledon Town Centre is dependent on the financial viability those schemes. Planning policies and strategies must be drafted carefully to ensure that this link is maintained and not broken so that schemes are prevented from coming forward when planning applications are determined." (Wimbledon landowner)*

14.8. *"I agree with looking at phases. It will need to be reviewed on a regular basis. It should be seen as a dynamic plan." (Wimbledon resident aged 46-60 years)*

14.9. *"High quality, beauty, sustainability, low rise and human centric design are paramount" (Wimbledon resident aged 46-60 years)*

14.10. *"Only development where residents have been listened to is YMCA. Community groups views to be taken more seriously in future plans. Short term Wimbledon will remain a mish mash of developments" (Wimbledon resident aged 46-60 years)*

14.11. *"Design quality is v important, developers should consider how they can put back into the community, rather than purely considering their profits when factoring in*

quality" (Wimbledon resident aged 31-45 years)

14.12. *"Where is the funding coming from? How quickly is it achievable? Nobody wants to live in, work in or visit a continuous building site. How much of this is realistic?" (Wimbledon resident)*

14.13. *"We would therefore wish to see a stronger reference to the importance of early and ongoing community engagement included in the SPD and for this to be identified as a key activity in the Implementation Plan" (Residents' Association)*

14.14. *"I wish people who object to this plan would realise we need the money from this development to make the town better." (Wimbledon resident aged 19-30 years)*

14.15. *"I was very impressed recently by the work that the YMCA have done on their plans to make them acceptable and even welcomed by local residents. I would urge you to apply the same principles and imagination to your dreary and uninspiring plan that is not what was asked for." (Wimbledon resident)*

Response to the comments

14.16. The responses received in the 2018-19 consultation highlighted a need for a delivery plan to accompany the SPD vision. Positive comments were received in relation to the

delivery section, but the negative comments related back to issues already mentioned including building height, commercial growth, uncertainty around Crossrail 2 and sustainability.

Suggested changes

14.17. Following careful consideration of the comments on the Delivery section these changes have been made to the SPD:

- More consideration for the Climate Emergency in all aspects of delivery.
- More emphasis on applicants engaging local residents at an early stage in the design process.
- A clear checklist for applicants on what is required at pre-app to enable the delivery of the Future Wimbledon vision.

giving guidelines for the type of development that is envisaged for the town centre is helpful for our future planning. The message that Merton is pro-business and keen to develop increased office space in Wimbledon is encouraging. As an investor in the area we are pleased to see that Merton are embracing the opportunities that Crossrail 2 will bring and that if Crossrail 2 does not materialise, then the intention is still to redevelop the station area and grow the town centre. The redevelopment of Wimbledon station and the associated retail area would be a welcome benefit to both the business and the local community. We would particularly welcome an increase in pedestrianised and landscaped areas to enhance the local environment. We like the idea of buildings with active street frontages and think the taller buildings are well positioned in the central area and over the railway tracks

Response to the comments

15.6. The representations from landowners are supportive of the Future Wimbledon vision. The main concerns were that the building height guidance was too prescriptive, and site by site issues, such as the impact of the road bridge linking Queen's Road to Alexandra Road.

15.7. The SPD is guidance and landowners should be reassured that any applications will be assessed on their individual merits and in the context of local, regional and national

planning policies.

Suggested changes

15.8. Following careful consideration of the comments from landowners these changes have been made to the SPD:

- Review the wording in the building height guidance section to ensure that it is not overly-prescriptive and is compliant with the NPPF.
- Emphasise that the building heights shown are guidance only and individual schemes will be assessed on their merits and viability constraints.

16 CONCLUSION

16.1. The online questionnaire was a mixture of tick box responses and text comments. Our analysis of the data shows that where many people ticked “disagree” or “strongly disagree” with a section of the SPD, the text comments revealed that there was wider support for the plan and its themes. The issue of building height, commercial development and the uncertainty of Crossrail 2 tended to dominate people’s comments on the plan, despite clear support for greening and sustainability, public realm improvements, and design quality.

16.2. With regards to building height, respondents felt that 8-10 storeys was an acceptable height for new developments in Wimbledon town centre. The SPD accords with this view. The vast majority of buildings are shown in the plan as fewer than 10 storeys, with the exception of those backing on to the railway tracks at St George’s Road, which is the least sensitive area for growth.

16.3. The vision and priorities of the Future Wimbledon SPD are aligned with the “Build back better” proposals being suggested. In the SPD there is a greater focus on the experience of town centre by creating a mixed use neighbourhood for retail, office, community, culture, leisure and residential. The plan also recognises the importance of the public realm in supporting town centre uses, pop-up events and experiences.

16.4. The changes proposed following a review of the consultation responses can be

summarised into the following points:

- Greater emphasis on the Climate Emergency throughout the plan.
- Removal of over-track development, which was also the tallest proposed buildings. The maximum height is now 12 storeys.
- Guidance showing building height in metres.
- Review of the SPD in the context of Covid-19 recovery.

16.5. The next step for the Future Wimbledon SPD is for it to be adopted by Council in November.



Contact

future.merton@merton.gov.uk

9th Floor
Merton Civic Centre
London Road

Morden SM4 5DX

merton.gov.uk/futurewimbledon



Committee: Borough Plan Advisory Committee

Date: 7th October 2020

Wards: all

Subject: Approval of public consultation on Merton's draft Air Quality Supplementary Planning Document (SPD).

Lead officer: Director for Environment and Regeneration, Chris Lee

Lead member: Councillor Martin Whelton, Cabinet Member for Regeneration, Housing and Transport.

Contact officer(s): Ann Maria Clarke: Strategic Planner, Future Merton
Jason Andrews: Environmental Health Manager (Pollution)

Recommendations:

That the Borough Plan Advisory Committee consider Merton's draft Air Quality Supplementary Planning Document (SPD) and to resolve to recommend that Cabinet

- A. approve the six-week consultation on the draft SPD, to run for six weeks by winter 2020/21.
 - B. Delegate approval of the final consultation draft SPD to the Director of Environment and Regeneration in consultation with the Cabinet Member for Regeneration, Housing and Transport.
-

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. Our environment can impact significantly on the health and wellbeing of the population and of all the environmental factors, air pollution has the greatest impact. Current evidence shows that air pollution is associated with cardiovascular disease, lung cancer, respiratory disease, asthma and stroke. In 2003, Merton was designated as an Air Quality Management Area due to poor air quality across London.
- 1.2. The planning system has a key role in protecting people from unacceptable risks to their health and wellbeing in providing an adequate protection to the local environment. Therefore, air quality is a material consideration in determining development proposals. The draft SPD supports Local Plan policies and does not introduce new planning policies.
- 1.3. The purpose of this SPD is to help developers, decision makers, agents, residents and other interested parties to identify air quality issues to be addressed by way of development proposals.
- 1.4. The draft SPD includes information on planning policy and legislation, reducing dust and air quality impacts during construction, Air Quality Assessments, the role of green infrastructure in improving air quality and commercial premises.

2 DETAILS

- 2.1. The draft SPD provides technical advice for developers on how to minimise and reduce adverse impacts on air quality in development. It provides developers with clear information as to what is needed and how planning applications are evaluated in terms of air quality, which should help to speed up the planning process.
- 2.2. The draft SPD includes information on construction, development design, traffic reduction, electric vehicles, commercial premises - building ventilation and odour and how to carry out an air quality assessment to support development proposals. In accordance with planning legislation, the draft SPD also outlines:
 - Set out the planning policy framework.
 - Explain why air quality is important
 - Emphasise the importance of air quality as a material planning consideration.
 - When development proposals will need to carry out an air quality assessment to support their planning application.
 - Provides guidance on the process of air quality assessments.
 - The Council's approach to the use of planning conditions and S106 agreements in respect of air quality.

3 ALTERNATIVE OPTIONS

- 3.1. **Option 1.** not to prepare a SPD: An SPD will help in improve air quality, reducing the potential impact to population health. It will be a valuable tool for developers and highlight the role they can play in reducing poor air quality in Merton. *This is not recommended.*
- 3.2. **Option 2:** to prepare a shorter and less comprehensive document: this would not fulfil its intended role to guide and support applicants through the process. *This is not recommended.*
- 3.3. Importantly, the Council has commitment to produce an air quality SPD within Merton's Air Quality Action plan.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. Subject to Cabinet and Council approval and in line with planning regulations a six-week public consultation is proposed on the draft SPD by winter 2020/21.

5 TIMETABLE

- 5.1. A six-week public consultation is proposed on the draft SPD by winter 2020/21

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. The costs of preparing the SPD are covered in existing budgets. There are no further financial implications arising from this report.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. The process for preparing SPDs (Supplementary Planning Documents) is set out in Part 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. No implications.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. No implications.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. No implications.

11 APPENDICES – *the following documents have been relied on in drawing up this report but do not form part of the report*

- The Planning and Compulsory Purchase Act 2004 (as amended)
- The Localism Act 2011
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- The Town and Country (Development Management Procedure) (England) Order 2010
- The National Planning Policy Framework (NPPF 2019) and associated national planning practice guidance

This page is intentionally left blank



London Borough of Merton

Draft Air Quality Supplementary Planning Document (SPD)

Abbreviations

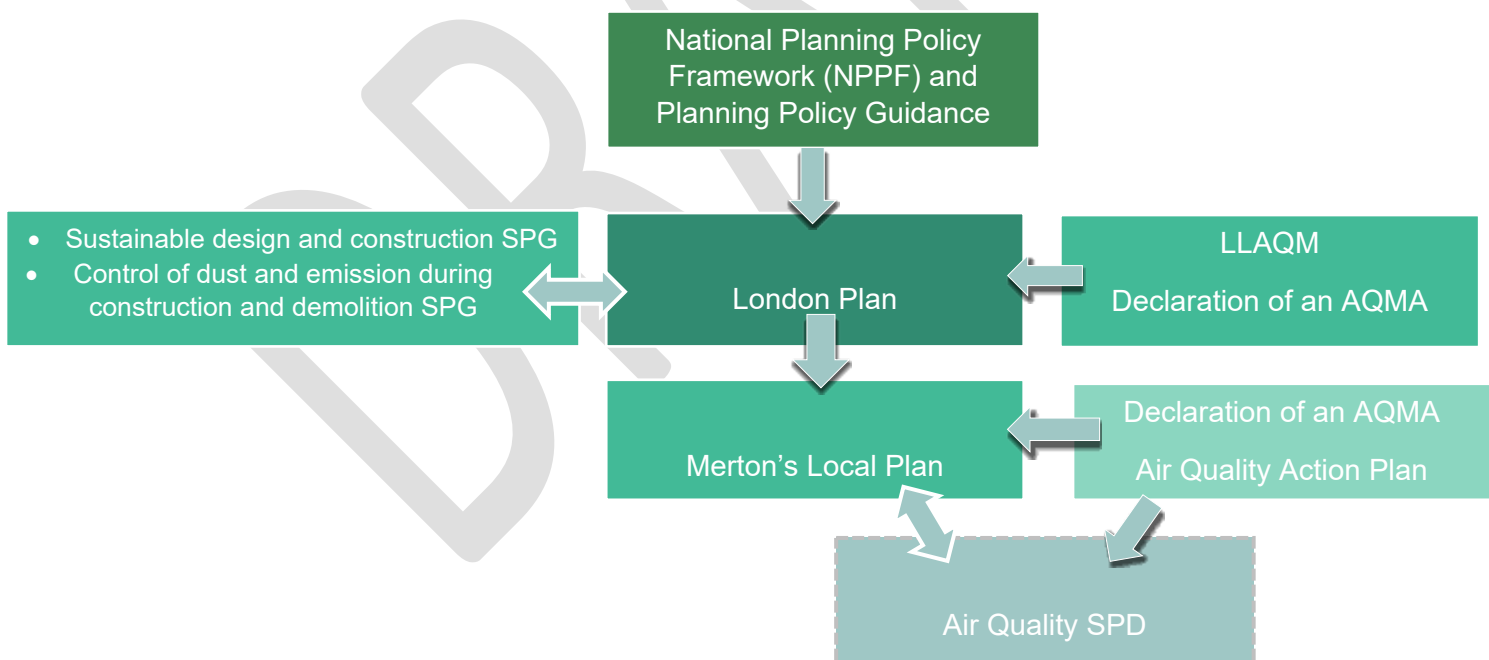
AQA Air Quality Assessment
AQAP Air Quality Action Plan
AQDMP Air Quality and Dust Management Plan
AQAF Air Quality Action Fund
AQFA Air Quality Focus Area
AQDRA Air Quality and Dust Risk Assessment
AQMA Air Quality Management Area
BEB Buildings Emission Benchmark
CAZ Clean Air Zone
CEMP Construction Environmental Management Plan
CCHP combined cooling, heat and power
CHP Combined heat and power
CIL Community Infrastructure Levy
CLP Construction Logistics Plan
EPUK Environmental Protection UK (United Kingdom)
GLA Greater London Authority
IAQM Institute of Air Quality Management
LAEI London Atmospheric Emissions Inventory
LAQM Local Air Quality Management
LEN Low Emission Neighbourhood
LLAQM London Local Air Quality Management
NO₂ Nitrogen dioxide
NO_x Nitrogen oxides
NPPF National Planning Policy Framework
NPPG National Planning Practice Guidance
NRMM Non-Road Mobile Machinery
PM Particulate matter
PM₁₀ Particulate matter less than 10 microns in diameter
PM_{2.5} Particulate matter less than 2.5 micron in diameter
SPD Supplementary Planning Document
SPG Supplementary Planning Guidance
TEB Transport Emissions Benchmark
ULEZ Ultra Low Emission Zone

Chapter one: Introduction

1. Introduction

- 1.1 This Supplementary Planning Document (SPD) has been produced by the London Borough of Merton to address the health issue of air quality and to provide a consistent approach for development proposals in the borough. This SPD is a material planning consideration when determining development proposals submitted for planning permission.
- 1.2 The purpose of this SPD is to help developers, decision makers, agents, residents and other interested parties to identify issues to be addressed in any development proposal application in which air quality will be an important. The SPD relationship with other planning policies (national, regional and local) is illustrated in figure 1 below.
- 1.3 It should be read in conjunction with and within the context of the relevant policies in Merton's Local Plan, other development plan documents and other relevant SPD's and Merton's air quality documents and plans, where applicable.
- 1.4 This SPD covers a range of topics (such as design, transport, sustainability and planning obligations) and all sections should be read in conjunction with and within the context of, other planning documents.

Figure 1: The role of this SPD and its relationship to national, regional and local policy and guidance and the AQAP (Air Quality Action Plan):



- 1.5 The term 'air pollution' refers to both those air pollutants such as odour and dust can influence human health and the natural environment which can influence the quality of life for those living or working near sources.
- 1.6 This SPD applies to developments that may have an impact on air quality:
 - All major development

- Any development (including conversions) that introduces new exposure into areas of poor air quality; and
- Smaller development that may emit odours, dust, smoke, and other fumes, for example, commercial kitchens and construction of basement developments

- 1.7 Major Development includes any one or more of the following:
- a) Working of minerals or the use of land for mineral-working deposits.
 - b) Waste development.
 - c) The provision of dwelling houses where:
 - i. the number of dwelling houses to be provided is 10 or more; or
 - ii. the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
 - d) The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more: or
 - e) Development carried out on a site having an area of 1 hectare or more.

- 1.8 It is strongly recommended that applicants always check whether there are any additional requirements with regard to air quality and planning in a specific area within Merton such as, Air Quality Focus Areas (AQFAs), Clean Air Zones (CAZs) and Low Emission Neighbourhoods (LENs) or similar are all considered to be areas of special importance for air quality, where additional requirements apply.

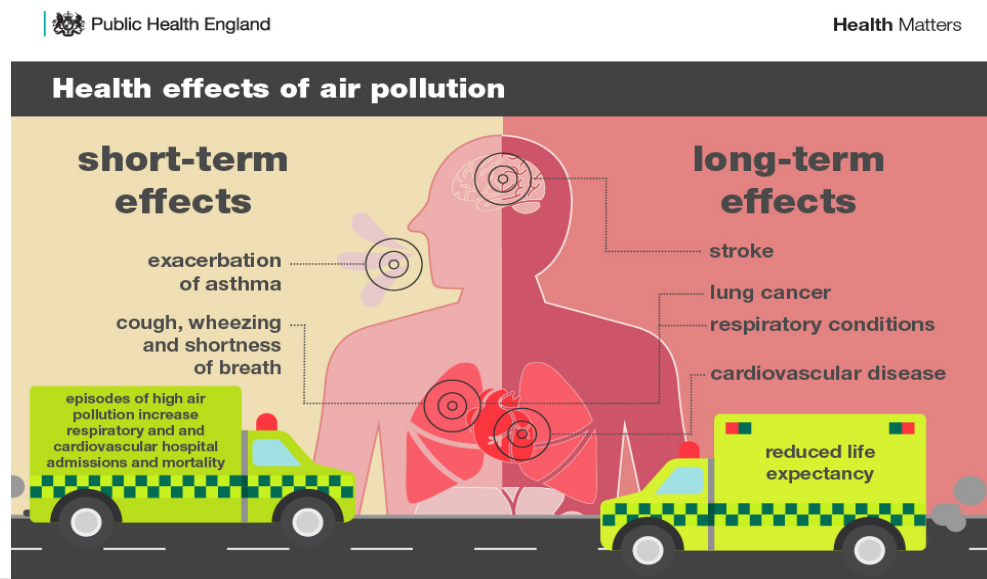
Air quality in Merton

- 1.9 Pollution in Merton comes from a variety of sources. This includes pollution from sources outside of the borough and in the case of particulate matter; a sizeable proportion of this comes from outside London and beyond the UK (United Kingdom). Of the pollution that originates in the borough the main sources of NO₂ are transport (57.1%), domestic gas boilers (18.8%) and static non-road mobile machinery (11.6%).
- 1.10 The main sources of particulate matter are road transport (50.4%), re-suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). In respect of the transport sources apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NO_x emissions and 80% of the PM₁₀ emissions (based on 2013 modelled data). This supports the evidence from the dispersion modelling (appendix X) which shows that the highest concentrations of both NO₂ and PM₁₀ are most strongly associated with the main traffic routes and road junctions within the borough.

Chapter two: Understanding air quality

2. Air pollution

- 1.11 Air pollution can adversely affect human health and has been linked to cancer, asthma, stroke and heart disease¹, diabetes, obesity, and possibly dementia. A 2018 study² carried out by The Royal College of Physicians, showed a link between the dementia and exposure to nitrogen dioxide (NO₂) and toxic air particles. Patients living within the M25 in areas with the highest NO₂ levels were 40% more likely to develop dementia than those in areas with lowest levels, researchers said. Although, the Alzheimer's Research UK said the results should be treated with caution and further research is needed.



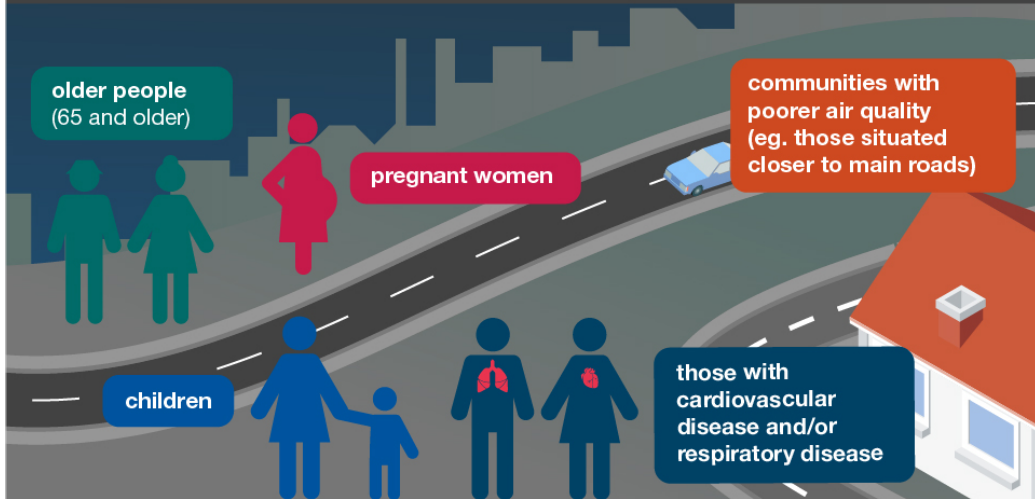
- 1.12 A study carried out by Kings College for London for Transport for London (TfL), found that long term exposure, is estimated to result in 9,400 premature deaths in 2010 in the capital: with added impacts due to short term pollution episodes.
- 1.13 Air quality tends to be worst close to major roads, but emissions over a wide area contribute to the background pollution levels. Health effects can potentially occur below widely accepted international standards and goals. For some pollutants, such as particulate matter (PM), there is no known threshold below which health effects do not occur. Therefore, there is a need to reduce background levels as well as emissions from road traffic to protect human health.

¹ British Heart Foundation: https://www.bhf.org.uk/toxicair?gclid=EAlaQobChMI9OO8nlSk5wIVSbDtCh0A3AymEAYASAAAEgLyC_D_BwE&gclidsrc=aw.ds

² Are noise and air pollution related to the incidence of dementia? A cohort study in London, England <https://bmjopen.bmj.com/content/8/9/e022404>

The Royal College of Physicians, 2016, Every breath we take: The lifelong impact of air pollution. London. <https://www.rcplondon.ac.uk/projects/outputs/everybreath-we-take-lifelong-impact-air-pollution>

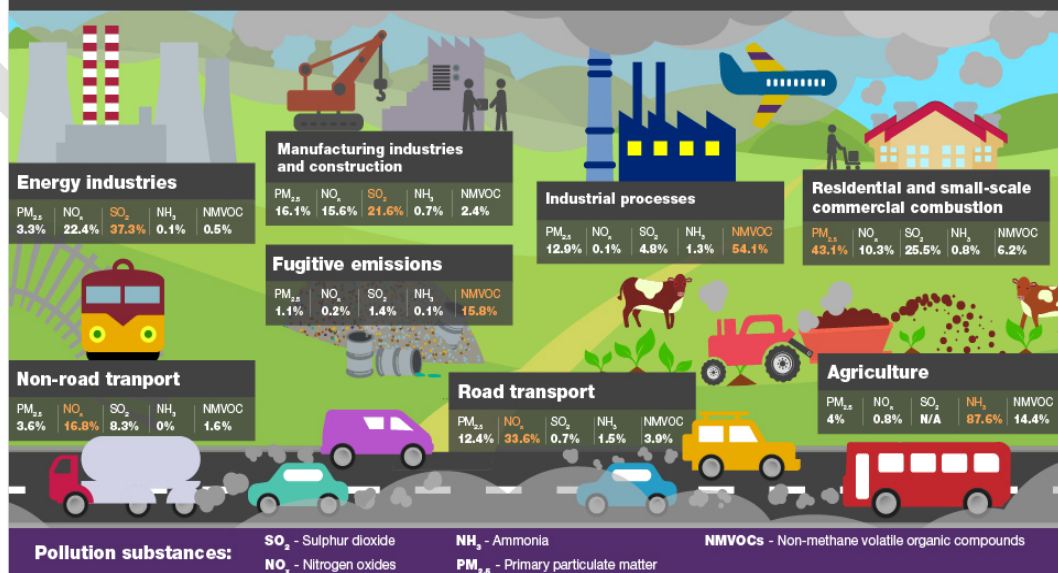
Air pollution affects everyone but there are **inequalities in exposure** and the greatest impact on the most vulnerable



1.14

Air pollution is a worldwide issue that affects everyone, but always the most socioeconomically disadvantaged suffer most from the health effects of pollution. Other groups disproportionately affected include older people, children, pregnant women, individuals with existing medical conditions, and communities in areas of higher pollution levels.

Sources of air pollution



- 1.15 Between 2017 and 2025, the total cost of PM_{2.5} and NO₂ combined is estimated to be £1.6 billion in models used in PHE's cost of air pollution project. The Environment Audit Committee has estimated that total health costs because of air pollution range between £8.5 billion and £20.2 billion a year. Poor air quality can also have an economic impact by reducing productivity among people of working age. Department for Environment, Food and Rural Affairs (Defra) estimated that in 2012, poor air quality cost the UK economy £2.7 billion through productivity loss. As with the evidence of harm the exact figures should be seen as estimates; what they demonstrate is that there are potentially significant economic benefits as well as health benefits to set against costs.

What is particulate matter (PM)?

- 1.16 PM is a generic term used to describe a complex mixture of solid and liquid particles of varying size, shape, and composition. Some particles are emitted directly (primary PM); others are formed in the atmosphere through complex chemical reactions (secondary PM). The composition of PM varies greatly and depends on many factors, such as geographical location, emission sources and weather.
- 1.17 The main sources of manufactured PM are the combustion of fuels (by vehicles, industry and domestic properties) and other physical processes such as tyre and brake wear. Natural sources include windblown soil and dust, sea spray particles and fires involving burning vegetation.
- 1.18 PM is often classified according to by aerodynamic³ size and referred to as:
- coarse particles (PM₁₀; particles that are less than 10 microns (µm) in diameter)
 - fine particles (PM_{2.5}; particles that are less than 2.5 µm in diameter)
 - ultrafine particles (PM_{0.1}; particles that are less than 0.1 µm in diameter)
- 1.19 The size of particles and the duration of exposure are key determinants of potential adverse health effects. Particles larger than 10 µm are mainly deposited in the nose or throat, while particles smaller than 10 µm pose the greatest risk because they can be drawn deeper into the lung. The strongest evidence for effects on health is associated with fine particles (PM_{2.5}).

What is nitrogen dioxide (NO₂)?

- 1.20 NO₂ is a gas that is produced along with nitric oxide (NO) by combustion processes. Together they are often referred to as oxides of nitrogen (NO_x). Defra estimates that 80% of NO_x emissions in areas where the UK is exceeding NO₂ limits are due to transport, with the largest source being emissions from diesel light duty vehicles (cars and vans). Other sources include power generation, industrial processes, and domestic heating.

³ The aerodynamic diameter of a particle is defined as that of a sphere, whose density is 1 g cm⁻³ (cf. density of water), which settles in still air at the same velocity as the particle in question. This diameter is obtained from aerodynamic classifiers such as cascade impactors.

Chapter three: Air quality legislation

3. Air quality legislation and frameworks

Clean Air Strategy 2019

1.21 The strategy sets out comprehensive actions required across all parts of government and society to improve air quality. The strategy sets out how the government will:

- protect the nation's health
- protect the environment
- secure clean growth and innovation
- reduce emissions from transport, homes, farming and industry
- monitor our progress

1.22 The strategy is a key part of delivering the government's 25 Year Environment Plan.

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

1.23 [The Air Quality Strategy](#) sets out air quality aims and policy options to improve air quality in the UK. The objectives are policy targets often expressed as a maximum ambient concentration not to be exceeded, either without exception or with a permitted number of exceedances, within a specified period.

1.24 Local authorities have a legal duty to work towards achieving these air quality objectives. These objectives were set in the 1990s, since when there has been significant new evidence on the health effects. In addition, in setting the objectives the Government took account of several factors, such as economic efficiency, practicality, technical feasibility and timescale of achieving them. For these reasons public health can be affected below these levels.

Clean Air Strategy 2019

1.25 The strategy sets out comprehensive actions required across all parts of government and society to improve air quality. The strategy sets out how the government will:

- protect the nation's health
- protect the environment
- secure clean growth and innovation
- reduce emissions from transport, homes, farming and industry
- monitor our progress

1.26 The strategy is a key part of delivering the government's 25 Year Environment Plan.

1.27 [A Clean Air Zone Framework](#) was published by the Government in May 2017 and replaces the 2015 Air Quality Plan, which reiterated the need for London to improve air quality.

London air quality plans and strategies

1.28 The Mayor of London has introduced a package of measures to achieve the statutory NO₂ limit values in London in the shortest possible time. This includes the [Ultra-Low Emission Zone \(ULEZ\)](#) introduced in 2019 in central London and

its extension in 2021 to the area within the North and South Circular roads in 2021. This ULEZ is equivalent to a Class D charging CAZ (Clean Air Zones) in the Clean Air Zone Framework.

- 1.29 All London boroughs are also planning to introduce charging CAZs. Merton Council supports the Mayor Clean Air Zones and is explore introducing CAZs in the borough.
- 1.30 [The Mayor's London Environment Strategy 2018](#) contains a list of measures to improve air quality. The aim is *“for London to have the best air quality of any major world city by 2050, going beyond legal requirements to protect human health and minimise inequalities”*.
- 1.31 The strategy includes setting new targets for PM2.5 with the aim of meeting World Health Organization (WHO) guidelines by 2030, the establishment of zero emission zones from 2020, the introduction of an air quality positive development, the phasing out the use of fossil fuels to heat, cool and maintain London's buildings and the introduction of a low emission zone for non-road mobile machinery (NRMM).
- 1.32 The statutory framework for local air quality management is the National Air Quality Regulations and Part IV of the [Environment Act 1995](#). This remains in place and applies to all London boroughs. However, it was agreed with Department for Environment, Food and Rural Affairs (Defra) that, the relevant Local Air Quality Management guidance (LAQM) for London should differ from the rest of the UK in recognition of the particular challenges the capital faces.
- 1.33 Therefore, the Mayor of London (“the Mayor”) in May 2016, launched a bespoke system for the capital - London Local Air Quality Management (LLAQM). The LLAQM is the statutory process by which London boroughs are required to review air quality in their boroughs. It has two main purpose:
- To encourage close working to help address this vital issue.
 - To decide if air quality objectives set within the Air Quality Regulations 2000 and the Air Quality (Amendment) Regulations 2010 are likely to be met in a certain area. The LLAQM, also drives improvements to achieve those objectives.
- 1.34 The key LLAQM requirements for boroughs are:
- To continue to monitor and assess air pollution in their areas.
 - To ensure an Air Quality Management Area (AQMA) is declared and in place for any locations that are exceeding air quality objectives and EU (European Union) Limit Values.
 - To ensure that a current and relevant Air Quality Action Plan is in place for all AQMAs (Air Quality Management Area). The Action Plan should be updated every five years at a minimum, and progress against this should be reported annually.
 - To complete the annual monitoring and Action Plan update reports.

Merton's Local Area Quality Management plan and other air quality documents and plans can be viewed on Council's website: [Air quality plans and reports](#)

- 1.35 To help the boroughs undertaken their LLAQM duties the Mayor has identified several areas where there are both high concentrations of air pollution and high public exposure. These are known as Air Quality Focus Areas (AQFAs).

Low Emission Neighbourhoods

- 1.36 The Mayor of London has introduced Low Emission Neighbourhoods (LENs) which are area-based schemes that includes a package of measures focused on reducing emissions and promoting sustainable living more generally. A LEN is delivered by a borough with support from TfL, the Greater London Authority (GLA) and the local community. LENs are focused on areas of high exposure to high pollution which can be reduced through local measures, and locations with high trip generation and the potential to reduce emissions in the wider road network.

DRAFT

Chapter four: Planning policies context

4. Planning policy context

1.37 In assessing planning applications that may affect air quality in Merton or give rise to new exposure to poor air quality, the Council will have regard to policies in our Local Development Plan including this SPD, Merton's Air Quality Action Plan (AQAP), the London Plan, national planning policies and associated documents such as Supplementary Planning Guidance (SPG) and national planning guidance. The most recent version of plans and guidance documents, or equivalent, must be followed.

Local planning policies

1.38 Merton Council Local Plan looks to ensure that local environmental impacts of all new development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. The Local Plan policy: *Improving air quality and minimising pollution*.

1.39 [Merton's Local Plan](#) promotes active travel, efforts to minimise single occupancy vehicle journeys, encouraging more electric vehicles use and supporting landscaping and planting. The Local Plan air quality policy focuses on the requirements for assessing air quality at the planning application stage. Furthermore, the policy states that, where necessary the council will set planning conditions to reduce local environmental impacts and protect amenity on adjacent land uses to acceptable levels.

1.40 [Merton's Supplementary Planning Documents](#): Merton Council has produced several SPDs, each giving further guidance on planning policies within our Local Plan. All our SPDs draw upon relevant national, regional and local authority requirements and expectations for sustainable development and good practice. Merton's SPDs cover a range of topic such as basement development, sustainable drainage, housing and design. It is advisable to read and have regard to these Merton's SPDs depending on the nature and type of development proposal.

1.41 [Merton's Third Local Implementation Plan \(LIP3\)](#) is the council's main transport strategy and sits alongside the council's Local Plan and other future strategies. The [Mayor's Transport Strategy \(MTS\)](#) requires London boroughs to produce a Local Implementation plan setting out how they will deliver the Mayor's transport objectives and MTS goals.

1.42 The LIP3 has an overview of the challenges and opportunities in delivering the Mayors' Transport Strategy within Merton. It sets how the Council will of Merton's transport objectives; a short- and longer-term delivery plan and a series of targets set by Transport for London (TfL), that we are working towards achieving. The LIP3 shows how Merton Council will work towards achieving the MTS (Mayor of London Transport Strategy) goals of:

- Healthy Streets and healthy people
- A good public transport experience
- New homes and jobs

Mayor of London strategies and Supplementary Planning Guidance (SPG)

London Plan

1.43 The overarching plan for London is the Mayor's London Plan. It is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London ("the Mayor") in accordance with the [Greater London Authority Act 1999 \(as amended\)](#) ("the GLA Act") and associated regulations. In December 2019 following an Examination in Public the Mayor considered the Planning Inspectors recommendations and issued to the Secretary of State his intention to publish the London Plan (a clean and tracked version) of the Intend to Publish London Plan. This London Plan is expected to be adopted in spring 2020⁴.

1.44 The Mayor of London is obliged to produce [Mayoral Strategies](#) which, support the London Plan, covering topics such as housing, health inequalities, economy, skills and training, transport and culture. It is advisable to have regard all the Mayoral Strategies when submitting development proposals. The following paragraphs provides a highlight of the Mayoral Strategies *-it is does not provide a full account of each strategy nor is the list exhaustive.*

Environment Strategy

1.45 This is the first strategy to bring together approaches to every aspect of London's environment, integrating the following areas:

- air quality
- green infrastructure
- climate change mitigation and energy
- waste
- adapting to climate change
- ambient noise
- low carbon circular economy

1.46 The overarching aim of the [Environment Strategy](#) is to reduce air pollution in London so that the health of all Londoners is improved. The strategy states that all new major development must be Air Quality Neutral (AQN). Development that meets or is better than the AQN benchmarks are considered to avoid any increase in NOx (nitrogen oxides) and PM emissions across London and are therefore "Air Quality Neutral." This influences the background air pollution in London.

1.47 Larger developments have the potential to go further and improve local air quality by effective design. For example, by the provision of low or zero emission heating. This is considered to be Air Quality Positive development and the Mayor is committed to providing guidance for developers and others on the most effective approach to take to ensure a development is Air Quality Positive. This approach is consistent with the London Plan (2020), Policy SI 1 *Improving air quality*.

⁴ This is subject to change

Health Inequalities Strategy

1.48 The London [Health Inequalities Strategy](#) sets out the Mayor's ambitions to improve Londoners' health and reduce health inequalities across the city. The strategy has 6 aims:

- Healthy children
- Healthy minds
- Healthy Places
- Healthy communities
- Health living

1.49 All the above aims highlight the important of tackle London air pollution and reducing the causes of poor air.

The transport Strategy

1.50 The [Transport Strategy](#) says that transport does not only shape our daily lives and how we get around London – it can create new opportunities for Londoners and shape the character of our city. It points out that car dependency has contributed to an increase in poor public health across our city. Streets can often be polluted, congested and dangerous – unwelcoming places to walk or cycle. More sustainable modes such as the tube, rail and bus can be overcrowded, sometimes unreliable and indirect; meaning there is no appealing alternative to car use for many. The strategy details how the Mayor aims to change the transport mix across London, providing practical and attractive alternatives that will allow Londoners to reduce their dependence on cars. The Strategy as its golden thread has a Healthy Streets Approach focusing on:

- Healthy Streets and healthy people
- A good public transport experience
- New homes and jobs

The London Food Strategy

1.51 The [Food Strategy](#) recognises and emphasis that the way the food system works has a major influence on London's air quality. Our food supply depends on many sources and processes. As the London Environment Strategy highlights, for every two tonnes of food eaten in the UK, another tonne is wasted. Most of this ends up in landfill or is incinerated.

1.52 The whole food supply chain impacts the environment from production to transportation to packaging and the unused food that is thrown away. The food system is also a major determinant of London's air quality.

Economic Development Strategy

1.53 The [Economic Development Strategy](#), acknowledges that growth must not come at the expense of poorer air quality, higher greenhouse gas emissions, increased noise levels, unfair employment practices or greater inequality.

Mayoral Supplementary Guidance's (SPGs)

In relation to air quality there are two that all development proposal must have regard to Sustainable Design and Construction and The Control of Dust and

Emissions during Construction and Demolition SPGs (Supplementary Planning Guidance).

- 1.54 [Sustainable Design and Construction SPG](#): includes guidance on preparing air quality assessments, minimising emissions, addressing exposure to air pollution, air quality neutral requirements and emissions standards for combustion plant.
- 1.55 *On-site Combustion Plant*: The Sustainable Design and Construction SPG sets emission limits for certain combustion plant and requires the use of ultra-low nitrogen oxides (NOx) boilers. These limits for individual boilers must always be met. In addition, stack discharge velocities should be above the recommended minimum and be at right heights above nearby buildings. The emissions from any centralised onsite energy plant must form part of an Air Quality Assessment (AQA).
- 1.56 [The Control of Dust and Emissions during Construction and Demolition SPG](#), describes requirements for dust assessments, pollutant monitoring and standards. All Non-Road Mobile Machinery (NRMM) used during the course of the development that is within the scope of the GLA 'Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (SPG) dated July 2014, or any successor document, shall comply with the emissions requirements there. The SPG requires developers to produce an Air Quality and Dust Risk Assessment (AQDRA) and sets out minimum emission requirements for non-road mobile machinery (NRMM).
- 1.57 Furthermore, the Council has a Local Code of Practice for Construction and Demolition Sites, this provides simple advice to developers on environmental controls required by the borough.
- 1.58 **Air Quality Neutral**: Calculation of emissions compared to the Air Quality Neutral (AQN) benchmarks must be carried out as part of the assessment of air quality impacts (see Section x). If the AQN benchmarks cannot be met planning consent will be refused. Following the publication of the Government's Housing Standards Review in March 2015, the Air Quality Neutral benchmarks, and the on-site energy generation emission limits referenced below, cannot be required for developments that are residential only.
- 1.59 However, the Mayor of London and national government have legal obligations on compliance with the EU (European Union) limits for ambient air quality. To address those obligations, with respect to nitrogen dioxide (NO₂), residential developers are strongly encouraged to ensure that emissions meet the AQN benchmarks.
- 1.60 **Air Quality Positive (AQP)**: at the time of writing this SPD the Mayor of London had not produced guidance on Air Quality Positive development. Once one has been produced it must be used to inform the design and layout of large developments in Merton.

National planning policy and associated guidance

- 1.61 [The National Planning Policy Framework \(NPPF\)](#) requires that planning policies and decisions contribute to and enhance the natural and local environment by ensuring that new development proposals do not contributing to or have an adverse impact on the levels of air pollution. In addition, secure a good standard of amenity for all existing and future occupants of land and buildings. The

national [Planning Practice Guidance \(PPG\)](#) provides general advice on the assessment of air quality.

Other planning considerations

- 1.62 [Building Regulations](#): covers the construction and extension of buildings. It is advisable to check if approval is needed before constructing or changing buildings in certain ways.
- 1.63 **Planning condition**: planning permission can be granted subject to planning conditions. Conditions are a necessary tool to enhance the quality of a development and to mitigate adverse impacts that might otherwise arise. They can only be imposed where they are necessary, relevant to planning and the development, and are enforceable, precise and reasonable in all other respects.
- 1.64 Conditions relating to the air quality impact of a development will meet these requirements. A planning obligation (under Section 106 of the Town and Country Planning Act 1990 (as amended) may also be used as a site-specific mitigation mechanism. The NPPF states that *“Planning obligations must only be sought where they meet all of the following tests:*
- a) Necessary to make the development acceptable in planning terms.*
 - b) Directly related to the development; and*
 - c) Fairly and reasonably related in scale and kind to the development.”*

Community Infrastructure Levy

- 1.65 CIL (Community Infrastructure Levy) is a charge on new development that is used to help fund the provision of infrastructure necessary to support development in Merton. The CIL operates through a charging schedule and from 31st December 2020 is supported by an annual Infrastructure Funding Statement which outlines the broad types of infrastructure that will be funded. The amount of CIL received and spent is monitored and reported on an annual basis. Further information on Merton’s CIL can be found on the [CIL webpage](#).
- 1.66 Most developments where there is an increase in floorspace of at least 100m² will be required to pay the CIL (Community Infrastructure Levy). There is no specific air quality component to the CIL in Merton, but Infrastructure Funding Statements will identify a range of infrastructure investment which could mitigate the impacts of airborne pollution in Merton for example through the provision and improvement of open spaces, reduce the potential for emissions for example through decentralised energy facilities or transport and public realm improvements leading to a reduction in vehicular traffic in specific areas.

Planning obligations

- 1.67 Planning Obligation (often called s106 agreements) are agreements with developers for the provision of site-specific mitigation measures necessary to ensure a development meets the requirements of the Local Plan and for affordable housing, local training, skills and job brokerage. Merton’s [Planning Obligation SPD](#) explains how obligations are used.

Chapter five: Air Quality Assessments

5. Air Quality Assessments (AQA)

AQA Scoping

1.68 In line with Merton's Local Plan the Council requires all new developments to be at least 'air quality neutral.' Preferably developments should be 'air quality positive' and if necessary, to be accompanied by an air quality assessment. This is designed to manage and prevent further deterioration of existing poor air quality across the borough. The requirements for the assessment of air quality impacts on new developments are set out in the following paragraphs:

Scoping the need for assessment

- major developments will need an Air Quality and Dust Risk Assessment (AQDRA) of the construction impacts.
- major developments that could have a significant negative impact on air quality during its operation will need an AQA (incorporating the AQDRA); and
- any development that will introduce new exposure to poor air quality will require an AQA

Air Quality Assessments (AQA)

1.69 The aim of an AQA is to find any significant impact on local air quality and/or disamenity due to dust and/or odour and/ or whether new development will introduce new exposure in an area of poor air quality. The contents of the AQA will depend on the nature of the proposed development.

1.70 An air quality assessment (AQA) must accompany planning applications as follows:

- major developments will need an air quality and dust risk assessment (AQDRA) of the construction impacts.
- major developments that could have a significant negative impact on air quality during its operation will need an AQA (incorporating the AQDRA); and
- any development that will introduce new exposure to poor air quality will

1.71 In deciding whether an AQA is needed developers should use the following criteria:

- A development that introduces new exposure to unacceptable levels of air pollution. For example, residential development in an area where an air quality objective or World Health Organization (WHO) guideline value may be exceeded or where there is a known odour issue. This applies to developments of all sizes including single houses and conversion of existing buildings. The poor air quality may be due to:
 - a) Emissions from adjacent roads.
 - b) Emissions from a nearby industrial process or large boiler; or
 - c) The proposed development creating a street canyon or other similar effect which reduces the dispersion of emissions.
- Any major development that meets the criteria for an AQA in the most recent Environmental Protection UK and Institute of Air Quality Management Guidance ("EPUK/IAQM Guidance")²⁵; (the criteria from the January 2017 version are reproduced in Appendix C).
- All mineral and waste developments requiring planning consent; and

- Development regulated under the Environmental Permitting (England and Wales) Regulation.
- 1.72 [The Institute of Air Quality Management](#) have produce several guidance to enhancing the understanding and development of the science behind air quality by promoting knowledge and understanding of best working practices. They have produced guidance air quality impacts on nature sites Guides covering:
- Impacts on designated nature conservation sites
 - Vicinity of demolition and construction sites
 - Assessing odour for planning
 - Assessing mineral dust impact for planning
- 1.73 The relevant IAQM (Institute of Air Quality Management) guidance document (or any updates) should be followed for developments that are likely to emit odours, new development that might be affected by existing odours, and mineral developments. Chapter 6 of EPUK/ IAQM's guidance on Land Use Planning and Development Control: Planning for Air Quality provides advice on undertaking an AQA. Developers required to produce an AQA for air pollutants, other than odour and dust, are recommended to instruct their consultants to follow this guidance (or future updates).
- 1.74 The relevant IAQM guidance document (or any updates) should be followed for developments that are likely to emit odours, new development that might be affected by existing odours, and mineral developments. 139. Chapter 6 of EPUK/ IAQM's guidance on Land-Use Planning & Development Control: Planning for Air Quality provides advice on undertaking an AQA. Developers required to produce an AQA for air pollutants, other than odour and dust, are recommended to instruct their consultants to follow this guidance (or future updates)
- 1.75 When modelling the impact of road Appendices transport, it is important that realistic forecasts of future emissions are used. The Emissions Factor Toolkit (EFT) produced by Defra for LLAQM has tended to be optimistic and resulted in an underestimation of future NO₂ concentrations. All AQAs (Air Quality Impact Assessments) of traffic impacts must discuss the uncertainty of predictions of future concentrations (which relates to both the assumed rate of fleet turnover and the emissions from future vehicles which may not exist and therefore the on-road performance is not known), and use professional judgement to determine the likely significant effects, taking into account the need for a conservative approach.
- 1.76 Where a centralised boiler/combined heat and power/ combined cooling, heating and power plant is included in a development, the AQA should model the impacts using a proper dispersion model and provide technical data on:
- fuel type.
 - emission characteristics including temperature at the flue exit, efflux velocity or volumetric flow rate, and concentration or emission rate (at standard conditions.
 - if actual data provided state conditions).
 - stack location and dimensions.
 - building(s) location, dimensions and orientation to north.

- assumed operating hours.
- the maintenance regime; and
- the cumulative impact of traffic and energy plant emissions at receptors

1.77 The Council may impose a planning condition restricting the operation of the plant to the hours of operation assumed in the AQA. The EPUK/IAQM criteria should be used to assess the significance of the impact on air quality at individual receptors using the WHO guideline values, not the air quality objectives as the air quality assessment levels.

1.78 To determine the overall significance of the effect on public health the range of local circumstances and the uncertainty of the predicted concentrations should be considered. These include, but are not limited to:

- The existing and future air quality in the absence of the development.
- The extent of current and future population exposure to the impacts; and
- The influence and validity of any assumptions adopted when undertaking
- The prediction of impacts

Merton's Air Quality Assessments (AQA) requirements

1.79 The AQA should include the following:

- Site location and brief description of the proposed development as it relates to air quality, including any mitigation measures designed into the development.
- A description of all nearby sources of pollution likely to impact on the development, including emissions from nearby centralised boilers/CHP/CCHP.
- Outline of the relevant planning and air quality policy (include odour and dust when appropriate).
- Description of the assessment method with data presented.
- Location and description of all receptors used in the assessment. This should include any particularly sensitive receptors²⁶ and may include ecological receptors.
- Assessment of the current air quality/ dust/odour in the vicinity of the proposed development.
- Prediction of the impact of the proposed development - for road traffic impacts this needs to include the future air quality both with and without the proposed development.
- An assessment of the impacts at individual receptors; description and quantification of further mitigation measures required to make the development acceptable in air quality terms.
- An assessment of the significance of the impacts after mitigation.
- An assessment of the cumulative impacts with other development during construction and operation.
- A statement as to whether the development is or is not consistent with the Borough's Air Quality Action Plan; and
- Conclusion of the assessment.

1.80 Where applicable, assessments should be carried out using a worst-case approach. For example, if certain parameters are unknown, reasonable worst-case assumptions should be used to ensure that the assessment results are conservative in nature. All AQA must be carried out by qualified air quality

specialist in the case of, development that may be near or next to nature and open space the AQA must have input from a qualified ecologist. It is recommended that developers and/ or their air quality consultants agree with the Council's Air Quality Officer the method and data to be used in the AQA prior to beginning the assessment.

Cumulative impact

- 1.81 Developers must assess the cumulative impact of multiple air pollution sources from the new development e.g. the combined impact of traffic and energy plant. The developer must also assess the cumulative impact of the construction and operation of the proposed development with all consented developments nearby. Consideration of proposed but not yet consented developments may be required and developers should check with the Council's Air Quality Officer before beginning their assessment.

Chapter six: Development and building design principles

6. Development and building design

1.82 Merton Council requires the sustainable design principles as set out in the Local Plan to be incorporated with in all development proposals. In addition, the Sustainable Construction Checklist and the London Sustainable Design and Construction SPG should be built into the design of all proposed development. Design should ensure that:

- Emissions associated with the development are minimised.
- Existing occupants are not exposed to increased levels of air pollution; and
- Occupants of new developments will not be exposed to poor air quality.

Development Principles

1.83 The following broad principles will be applied when considering development proposals for development that may have the potential to impact on air quality, result in an increase in the number of people exposed to poor air quality or cause disamenity. The development principles are:

- avoid during construction and operation of new development impacts on air quality to protect the health of people living and working in the borough
- avoid during construction and operation of new development adverse effects on local amenity of people living and working in the borough
- reduce to a minimum emission from new development, including from the associated road traffic, to improve air quality across the borough
- prevent development which is unacceptable in terms of air quality, odour, dust or other air emissions
- employ good air quality design

Development Design

1.84 All new development should be designed to minimise air quality impacts:

- The layout and design of all sites must consider the impact of poor air quality on existing and new receptors. The layout should set buildings as far from main roads as possible, avoid windows and habitable rooms fronting main roads and where possible use buildings as a screen against poor air quality.
- Non habitable room and corridors in residential developments and communal halls, canteens, changing rooms etc in commercial or community developments such as schools and hospitals should be located front facing the main road.
- The impact of existing sources of air pollution, including road traffic and exhaust from energy plants in adjacent building may affect air quality within a new development. This must be considered at the earliest stage of the design development and process.

Construction Phase

1.85 The construction phase of major development can result in emission of air pollutants that adversely affects human health as well as dust that may lead to nuisance or disamenity. To ensure that emissions are well controlled all planning consents for major development will include relevant planning conditions to reduce such impacts. A contribution to any additional resourcing required by the Council to fulfil added regulatory duties associated with the development may be required.

Odour

1.86 Development Proposals for major development that is likely to give rise to odour will need to include satisfactory evidence that there will not be an adverse impact on neighbouring land uses. In addition, any sensitive development proposed close to an existing odour source will also need to show that there will be no adverse impact on future users.

1.87 In the case of small-scale developments (e.g. commercial kitchens), evidence must be submitted to demonstrate that odour emissions will be controlled to prevent significant loss of amenity to neighbouring sensitive land uses. Typically, this will be by submission of a detailed ventilation scheme incorporating high level discharge and odour abatement. There should be no low-level discharge. Larger sources of odour must submit an odour assessment undertaken by a competent and qualified person. This must show that the proposed development is acceptable and will not intentionally affect the amenity of neighbouring land.

1.88 Where a development is proposed close to an existing source of odour the assessment must show that the users of the development will not be adversely affected by the development.

Building Ventilation

1.89 Merton Council requires the impact of outdoor air pollution on indoor air quality in new developments be considered at the earliest stages of building and layout design process. This includes ensuring:

- Ventilation inlets and the location of opening windows are on higher floors away from sources of air pollution at the ground level, but also away from stationary sources such as combustion plant.
- Air conditioning systems can be fitted with filters which filter particulates and NO₂; the appropriate standard filter should be maintained following installation.

Biomass or Biofuel Boilers and Combined Heat and Power

1.90 When sited and specified appropriately following the energy demands of the building, CHP systems and biomass or biofuel boilers can have benefits in terms of carbon emissions. However, they can give rise to significantly higher emissions of NO_x and/or PM₁₀ emissions than regular gas boilers, and developers should ensure that the emission standards set in the Mayor's Sustainable Design and Construction SPG are not exceeded. The Sustainable Design and Construction SPG does not currently provide guidance where plant is <50kWth input. The Council would expect such plant to meet a NO_x emission limit of <50mgNm³ at 5% (dry gas) as a minimum

1.91 When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Council would prefer developers not to consider installing a biomass burner due to Merton's status as an Air Quality Management Area for fine particles and nitrogen dioxide.

1.92 Research shows that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. As the CHP kWth input requirement increases, opportunities to achieve the required low NO_x technology are more complex, for example the need for single catalytic reduction (SCR), which has a similar space requirement to the CHP and has on-going costs. Where the CHP requirement would require the use of SCR to meet the NO_x emission standard, opportunities should be investigated to install smaller

units with NOx abatement to meet the demand.

1.93 Where CHP, biomass or biofuel boilers are proposed, plant emissions must be evaluated as part of a detailed Air Quality Impact Assessment. Where permitted, the appliance will be required to meet high standards of air pollution control, with particular emphasis on:

- plant design and operation.
- pollution abatement equipment.
- the servicing and maintenance regime.
- fuel quality, storage and delivery; and
- exhaust stack height, to reduce the risk of increasing exposure

1.94 Prior to CHP, biomass or biofuel plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority; this will be conditioned within the planning permission:

- The results of an emissions test proving compliance with the emission and efflux velocity requirements of the Mayor Sustainable Design and Construction SPG.
- An equipment maintenance schedule demonstrating that the emission standard would always be met.

Generators

1.95 Diesel generators have high emissions of NOx and PM10 and their use in the City is discouraged due to their negative impact on air quality. Where a secondary electrical power supply cannot be assured, where possible, alternate technology generators should be sourced for the building (e.g. gas fired or battery backup). For construction sites, a temporary building supply should be secured prior to the commencement of works to avoid the use of diesel generators on site.

1.96 Where permanent standby diesel generators are installed, they should be the newest Euro standard available and where possible, their use should be limited to life saving and emergency situations and testing only. Where generators are supplied for business continuity, abatement to reduce emissions should be investigated. The type, placement and use of the generator should be carefully considered at the planning stage in relation to up to date guidance.

1.97 Due to the air quality impact of generators and their potential to cause a statutory nuisance, the use of generators to supply the national grid at times of supply restriction and limitation is discouraged. Generator hierarchy overview:

- Source a secondary supply
- Alternate technology e.g. battery reserve / gas generators
- Diesel fuelled generators (newest Euro standard only)
- Lifesaving and testing only
- Business continuity with abatement

Combustion Flues and Efflux Velocity

1.98 A consideration of combustion flue location and emission discharge velocity is

required at the planning stage to ensure appropriate provision has been made. All combustion plant (boilers, generators, CHP etc.) must end as a minimum at least 1 metre above the highest point of the building of which the plant serves, or as specified by the approved Air Quality Impact Assessment, unless agreed with the Council. Regarding this requirement, consideration needs to be paid to the location of outside amenity space associated within the development and its neighbours.

- 1.99 The [Clean Air Act 1993](#) Chimney height approval needs to be sought where a furnace is burning liquid or gaseous matter at a rate of 366.4 kilowatts or more or burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour. Flues associated with this plant should therefore be at the recommended heights above nearby buildings and installed at least 3m above any general access areas and should meet discharge velocities above the recommended minimum. Regarding CHP and biomass boilers, discharge velocity requirements are provided in Appendix 7 of Sustainable Design and Construction SPG, or any updates thereof.

Chapter seven: Air quality and green infrastructure

7. Green infrastructure

1.100 Green infrastructure will play a significant role in reducing exposure for many years to come as our transport system evolves. Whilst, pollution from road transport is forecast to decrease significantly, an important source of ultrafine PM (the smallest particles) from road transport is the non-exhaust emissions associated with brake, tyre and road wear. In the long term, a reduction in traffic volume will be required to address these non-exhaust emissions.

1.101 The Mayor's Transport Strategy includes the ambitious target that 80% of trips in London are made on foot, by cycle or using public transport by 2041. Green infrastructure can help reliably reduce exposure to ultrafine PM emissions and their impacts on public health.

1.102 There are two key processes that explain how green infrastructure can protect people from pollution, dispersion and deposition.

1.103 *Dispersion:* Urban vegetation can reduce the amount of emissions people are exposed to. It does this by changing the speed and distance pollutants travel before they reach people. The further the distance the more the pollution is diluted with cleaner air – this process is known as dispersion.

1.104 *Deposition:* Urban vegetation typically removes a few per cent of emissions by a process called deposition. This refers to when pollution lands on the surface of the leaf and is removed from the air. This process is less important for reducing exposure to air pollutants in the urban environment than dispersion. When planning and designing, new development it is recommended must have regard to the Mayor of London guidance, [Using green infrastructure to protect people from air pollution](#). The guidance is divided into two parts:

- Street canyons: street with buildings on both sides
- Open roads: road with buildings only on one side, flanked by detached, single story buildings that are widely spaced and/or setback by a considerable distance

Figure 2: The right green infrastructure

Street canyons		Open roads	
Where air quality at street level is better than above surrounding buildings: street canyons with little or no traffic	Where air quality at street level is worse than above surrounding buildings: street canyons with moderate or heavy traffic	Where priority is to protect people immediately at the roadside (e.g. pedestrians and cyclists)	Where priority is to protect people further away (e.g. children in a school playground bordering the street)
	All street canyons with moderate or heavy traffic	Canyons of this sort with height/width ratio < 2	A hedge or green wall between vehicles and people can as much as halve exposure in their immediate wake
A dense avenue of trees can provide effective protection from polluted air above and create a clean 'green corridor' for active travel	Addition of green open space to one side (opening the street canyon) is always beneficial	A hedge or green wall between vehicles and people can reduce exposure in their immediate wake	A combination of hedge and dense line of trees can provide a taller vegetation barrier, offering protection over a greater distance downwind

Source: Using green infrastructure to protect people from air pollution.

Green Roofs, Walls and Planting

- 1.105 As well as increasing biodiversity, plants can play a role in trapping fine particles (PM10 and PM2.5) found in the air we breathe. Research shows that plants with small leaves (which disrupt the flow of air) and fine hairs on their surface work best; however, leaves which cover a large surface or are grooved also provide surfaces upon which particles can be trapped. To help improve air quality, developers are encouraged to source trees and plants which have these characteristics to include in open spaces, on green walls and roofs. The choice of species should also have regard to future climate conditions.

Outdoor Private and Communal Space

- 1.106 Roof gardens and terraces are becoming a common feature in London developments. The location of outdoor space in relation to sources of air pollution (for example busy roads and boiler flues) is an important consideration. Exposure should be minimised through right positioning and orientation of the space away from busy roads and combustion sources, where this also meets the requirements of the Local Plan to protect the amenity of neighbouring building occupiers.

Public Realm

- 1.107 Where public realm forms part of the development this provides an opportunity to encourage low pollution areas where people can spend time away from busy roads. The development should therefore incorporate design (where possible) that provides low pollution routes through the development, so that these routes are taken instead of along busy roads. The public realm should ensure that recreational, seating and exercise areas are away from or screened from sources of pollution.

Chapter eight: Reducing dust and air quality impacts during construction

8. Construction

Industrial and Commercial Premises

1.108 The assessments on the impacts of industrial emissions will depend on the type of process and, may include the impact of the traffic associated with the development as well as the emissions from the process itself. All potentially significant impacts from major development on air quality must be assessed, typically using a dispersion model.

1.109 For smaller operations that may give rise to odours, dust, smoke, dust or other air emissions, including commercial operations such as nail bars and commercial kitchens, information on the pollution control systems may be sufficient. Development proposals that has air emissions will be required to provide evidence of the:

- Pollution control system.
- Maintenance schedule; and
- Management systems to mitigate the impact

1.110 For developments not subject to the pollution control regime, planning consent will include a planning condition requiring the servicing and maintenance of the pollution control system.

Non-Road Mobile Machinery (NRMM)

1.111 All Non-Road Mobile Machinery (NRMM) used during the development that is within the scope of the Mayor's Control of Dust and Emissions during Construction and Demolition SPG or, any subsequent amendment or guidance, shall comply with the emission requirements there.

Transporting Waste and Construction Materials

1.112 To avoid congestion on the local road network, an outline [Construction Logistics Plan \(CLP\)](#) will be required with the planning application. Advice on the preparation of a CLP is provided by Merton Council Traffic and Highway team.

1.113 Deliveries at sensitive locations, for example close to schools, will need to avoid peak hours on grounds of both air quality and safety. Planning Consents for major developments will include a condition requiring the submission of a detailed CLP to be submitted for approval by the local planning authority. This will commit the developer to implement the plan for the duration of the construction works.

1.114 For development sites in and close to AQFAs, LENs and CAZs the Construction Logistic Plan should include

- Consideration of alternative transport measures including transporting waste and construction materials to and from development sites by train or water
- delivering materials over the 'last mile' by electric vehicles, or at times to be agreed by the local planning authority; and
- Restrictions on the use of certain types of vehicles e.g. exceptionally

large vehicles if they may add to local congestion, restrictions based on vehicle emission standards and/or other restrictions considered appropriate by the Council.

Operational Phase

- 1.115 Merton Council requires the design principles as set out in the Local Plan and the Mayor's Sustainable Design and Construction SPG to be built into the design of all proposed developments. Design should also ensure that existing occupants are not exposed to increased levels of pollution and that occupants of new developments will not be exposed to poor air quality.
- 1.116 The London Plan requires all major developments to be air quality neutral and large developments to be air quality positive. Developers should look to mitigate the air quality impacts, preferably through on-site measures, but where this is not possible, through off-site measures. Developers will need to contribute to the Borough's Air Quality Fund to mitigate any residual impacts. Planning consents for major developments will include one or more conditions requiring mitigation measures to make development acceptable in air quality terms. Developers may also be asked to submit a Delivery and Service Plan where applicable.

Chapter nine: Air Quality and transport impacts

9. Transport

Traffic reduction

1.117 Emissions from road traffic are the dominant source of elevated pollutant concentrations in London. Merton Council promotes modes of transport with low impacts on air quality in the Local Plan and LIP3 such as cycling and walking. The Council will require development proposals to incorporate transport measures that will contribute to minimising poor air quality such as:

- Public transport infrastructure and/ or additional public transport services, including financial contributions for public transport improvements (in addition to those required to mitigate transport impacts).
- All major development must have a travel plan. The travel plan must demonstrate how it will be maintained and how it will encourage all members of the development, residents, occupants, staff and visitors to travel sustainably. It must quantify emission reductions and air quality benefits.
- Developments should provide cycle parking in accordance with the standards set out in the London Plan as a minimum. Cycle parking should be suitable for long stay parking as set out in the London Cycle Design Standards¹⁸ or subsequent revisions. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, those catering for the carriage of children and cycles adapted for disabled people.
- Car club parking bays should be provided in all residential developments of 25 or more dwellings, at a rate of 1 per 25 dwellings, unless acceptable grounds can be given for alternative numbers. Financial contributions must be provided to car clubs to supply free membership for the users of the development for two years as an alternative to providing private parking spaces for residents and employees to reduce car trips.
- Dedicated car parking area(s) should be located near the site entrance where practical. Individual parking spaces next to houses will be discouraged. This is to encourage walking.

Electric vehicles

1.118 To improve air quality in Merton, the number of low emission vehicles usage needs to increase substantially. At the time of this SPD, a government consultation on changes to the Building Reg. The plan is to transpose EU legislation under the EU Energy Performance of Building Directive (EPBD) to set minimum requirements for electric vehicles charging infrastructure in new and existing non-residential buildings. The changes would mean that every new residential building with an associated car parking space and every non-residential building with more than 10 spaces will need to have at least one charging point and cable router for electric vehicle charging for on in five spaces.

1.119 Car parking should be provided with active and passive electric vehicle charging facilities consistent with the Local Plan and London Plan. Policy T6 Car parking ([London Plan 2020](#)) states that:

*Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with **Policy T6.1 Residential parking, Policy T6.2 Office parking, Policy T6.3***

Retail parking, and Policy T6.4 Hotel and leisure uses parking. All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities

Air Quality Focus Areas (AQFAs), Low Emission Neighbourhoods (LENs) and Clean Air Zones (CAZs)

- 1.120 AQFAs, LENs and CAZs have been designated in locations where there is unacceptable air pollution and for AQFA and LENs high exposure, which needs to be reduced as quickly as possible to protect human health. Introducing new emission sources into these areas, or areas bordering and having an adverse effect on them.
- 1.121 All developments proposed in or next to these areas must play their part in ensuring that air quality in these areas does not worsen and must contribute towards an overall improvement in air quality. Therefore, development within these areas need to robustly demonstrate that the impact of both direct and indirect emissions can be fully mitigated. Combustion plants should be avoided in these areas. Buildings are expected to use electric space and water heating, preferably generated using renewable energy sources, such as solar power and heat pumps.
- 1.122 All development in these areas should be car-free, apart from dedicated spaces for disabled parking and use by a car club as well as appropriate servicing arrangements (see below). No parking permit shall be issued in neighbouring CPZs (Controlled Parking Zone) (Controlled Parking Zone). All development in AQFAs, CAZs and LENs should be Air Quality Positive. Where this is not possible, additional contributions to the AQAF will be required
- 1.123 In addition, development for use by groups of the population that are particularly sensitive to the health effects of air pollution should not be located within these areas to reduce the number of vulnerable people exposed to poor air quality and improve public health. These include, but are not limited to:
- Schools,
 - day care and pre-school facilities,
 - GP surgeries,
 - nursing homes,
 - care homes and sheltered accommodation and
 - National Health Service facilities including hospitals and playgrounds; and community centres.
- 1.124 Residential development in these areas will need to show that proven mitigation measures will be implemented to reduce the exposure of future residents to acceptable levels. If there is uncertainty about future air quality, mitigation measures must enable annual mean concentrations to be reduced to at least 75% of the air quality objective or lower. Proposals should not incorporate STOR plant in these areas.

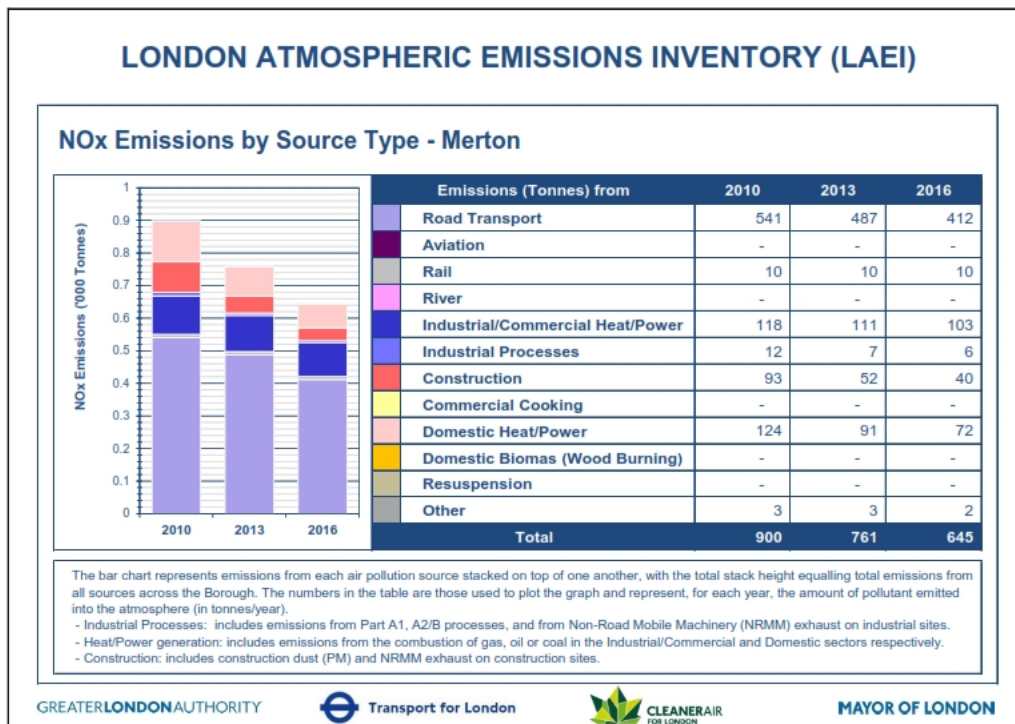
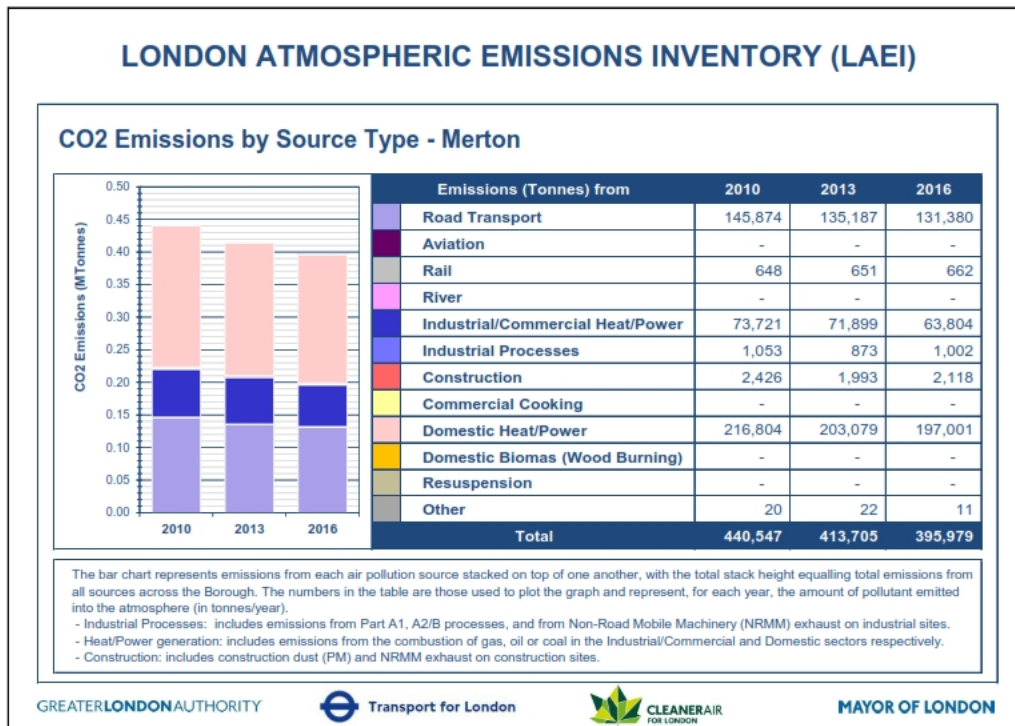
Appendices

Appendix A. Glossary

Air pollution	The presence of substances in the atmosphere that may cause harm to humans, and the natural or built environment. This includes nitrogen dioxide, odour and dust (including the smaller particles often referred to as particulate matter or PM).
Air Quality	A generic term referring to the level of pollution in the air.
Air Quality Assessment (AQA)	An assessment of the impact of a development on the levels of certain pollutants in the local area.
Air Quality Focus Areas	Air Quality Focus Areas as defined by the Greater London Authority in 2014, and any future designations.
Air Quality Management Areas (AQMAs)	Areas where the air quality objectives are likely to be exceeded. Declared by way of an order issued under the Section 83(1) of the Environment Act 1995.
Air Quality Objectives	Air quality targets to be achieved locally as set out in the Air Quality Regulations 2000 and subsequent Regulations. Objectives are expressed as pollution concentrations over certain exposure periods, which should be achieved by a specific target date. Some objectives are based on long term exposure (e.g. annual averages), with some based on short term objectives. Objectives only apply where a member of the public may be exposed to pollution over the relevant averaging time.
Exceedance	Concentrations of a specified air pollutant greater than the appropriate Air Quality Objective.
LLAQM.TG.16	London Local Air Quality Management Technical Guidance (2019). This document provides advice on how London local authorities should assess air quality.
Limit Values/EU limit values	The maximum pollutant levels set out in the EU Directives on Ambient Air Quality. In some cases, the limit value is the same as the national air quality objective but may allow a longer period for achieving it.
Major development	Development involving any one or more of the following: (a) the winning and working of minerals or the use of land for mineral-working deposits. (b) waste development. (c) the provision of dwelling houses where: (i) the number of dwelling houses to be provided is 10 or more; or (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i). (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more: or (e) development carried out on a site having an area of 1 hectare or more.

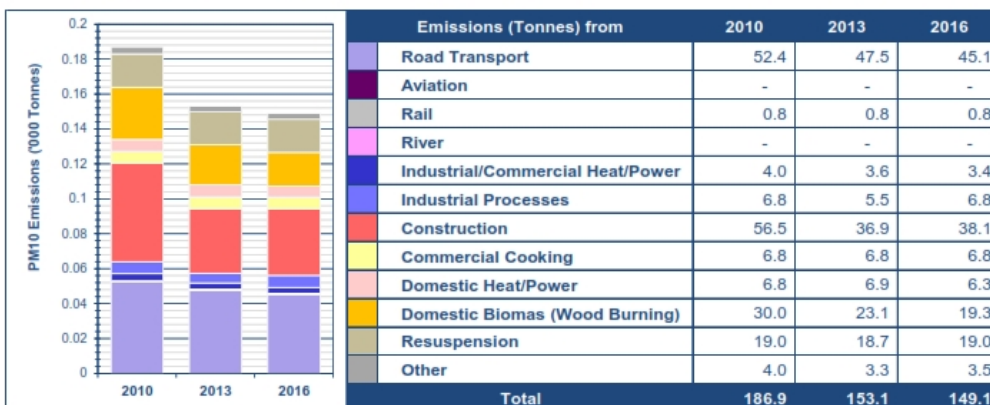
Mitigation	Mitigation measures will minimise, but not necessarily remove, the air quality impact of a development.
National Air Quality Objectives	See Air Quality Objectives.
National Air Quality Strategy	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. The current version at the time of producing this SPD was published in July 2007, with a supplement published in May 2018.
NO ₂	Nitrogen dioxide
NO _x	NO _x = nitrogen oxides, which includes nitric oxide and nitrogen dioxide. Most pollution sources emit nitrogen oxides primarily as nitric oxide. However, once in the atmosphere nitric oxide is converted to nitrogen dioxide. Therefore, it is important to know the concentrations of both NO _x and NO ₂ .
Offsetting	Measures which 'compensate' for anticipated increases in pollution in the area but not necessarily at the exact area. This might be for example by funding more general measures in the Borough's air quality action plan.
Part A1, A2 and B Processes	Types of industrial processes which are regulated under the Environmental Permitting Regulations.
PM ₁₀	Particulate matter with a diameter of less than 10 microns.
PM _{2.5}	Fine particulate matter with a diameter of less than 2.5 microns.
Receptor	A location where members of the public might be exposed to air pollution. Typically depends on the averaging period of the air quality objective as illustrated in Box 1.1 in LLAQM Technical Guidance (known as LLAQM.TG.16).
Sensitive receptor	A receptor where particularly vulnerable groups of the population spend significant time. These include children's nurseries, schools, playgroups, hospitals, GP surgeries/heath centres/nursing homes and care homes.
Street canyon	A road with buildings either side which restrict the dispersion and dilution of the emissions.
Vulnerable groups of the population	Generally considered to be children, the elderly and those with pre-existing respiratory and cardiovascular diseases. During demolition of buildings patients with diseases that suppress their immune system may be vulnerable groups due to the emission of fungal spores.

Appendix B: London Atmospheric Emissions Inventory for Merton



LONDON ATMOSPHERIC EMISSIONS INVENTORY (LAEI)

PM10 Emissions by Source Type - Merton



The bar chart represents emissions from each air pollution source stacked on top of one another, with the total stack height equalling total emissions from all sources across the Borough. The numbers in the table are those used to plot the graph and represent, for each year, the amount of pollutant emitted into the atmosphere (in tonnes/year).

- Industrial Processes: includes emissions from Part A1, A2/B processes, and from Non-Road Mobile Machinery (NRMM) exhaust on industrial sites.
- Heat/Power generation: includes emissions from the combustion of gas, oil or coal in the Industrial/Commercial and Domestic sectors respectively.
- Construction: includes construction dust (PM) and NRMM exhaust on construction sites.

GREATERLONDONAUTHORITY



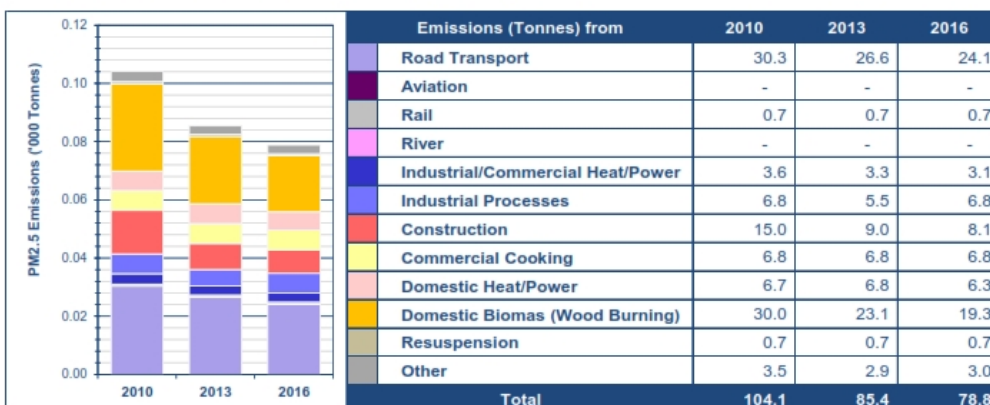
Transport for London



MAYOR OF LONDON

LONDON ATMOSPHERIC EMISSIONS INVENTORY (LAEI)

PM2.5 Emissions by Source Type - Merton



The bar chart represents emissions from each air pollution source stacked on top of one another, with the total stack height equalling total emissions from all sources across the Borough. The numbers in the table are those used to plot the graph and represent, for each year, the amount of pollutant emitted into the atmosphere (in tonnes/year).

- Industrial Processes: includes emissions from Part A1, A2/B processes, and from Non-Road Mobile Machinery (NRMM) exhaust on industrial sites.
- Heat/Power generation: includes emissions from the combustion of gas, oil or coal in the Industrial/Commercial and Domestic sectors respectively.
- Construction: includes construction dust (PM) and NRMM exhaust on construction sites.

GREATERLONDONAUTHORITY



Transport for London



MAYOR OF LONDON

Appendix C: Location of Air Quality Focus Areas

The Greater London Authority (GLA) identified Air Quality Focus Areas in 2014. These are locations that not only exceed the EU annual mean limit value for NO₂ but are also locations with high human exposure. The Focus Areas were defined to address concerns raised by boroughs within the Local Air Quality Management process and forecasted air pollution trends. This is not an exhaustive list of London's hotspot locations, but where the GLA believe the problem to be most acute.

Insert map.

DRAFT

Appendix D: EPUK/IAQM Air Quality Assessment Screening Criteria

This appendix provides the EPUK/IAQM screening criteria for an air quality assessment as published in January 2017. This guidance is periodically updated, and the most recent version should be used. In the case of an assessment of the impacts of a development in the local area, a two-stage approach is suggested.

The first stage is intended to screen out smaller development and/or developments where impacts can be considered to have insignificant effects⁵.

The second stage relates to specific details about the proposed development and the likelihood of air quality impacts. Stage 1 requires any of the criteria under (A) coupled with any of the criteria under (B) in figure 3 below, to apply before it is considered appropriate to proceed to Stage 2.

If none of the criteria are met, then there should be no requirement to carry out an air quality assessment for the impact of the proposed development on the local area, and the impacts can be considered to have insignificant effects. Figure 3 below, sets out the Stage 1 criteria designed to remove the need to assess impacts arising from small developments.

Figure 3: Stage 1 Criteria

Criteria to Proceed to Stage 2
A. If any of the following apply: 10 or more residential units or a site area of more than 0.5ha; or more than 1,000 m ² of floor space for all other uses or a site area greater than 1ha
B. Coupled with either of the following: the development has more than 10 parking spaces the development will have a centralised energy facility or other centralised combustion process.

* Note: Consideration should still be given to the potential impacts of neighbouring sources on the site, even if an assessment of impacts of the development on the surrounding area is screened out.

The criteria in figure X below, provide more specific guidance as to when an air quality assessment is likely to be needed to assess the impacts of the proposed development on the local area. The criteria are more stringent where the traffic impacts may arise on roads where concentrations are close to the objective.

The presence of an AQMA (Air Quality Management Area) is taken to indicate the possibility of being close to the objective, but where whole authority AQMAs are present and it is known that the affected roads have concentrations below 90% of the objective, the less stringent criteria is likely to be more appropriate. Where an air quality assessment is found as being needed, then this may take the form of either a Simple Assessment or a Detailed Assessment.

In other words, passing a screening criterion in figure 4 does not automatically lead to the requirement for a Detailed Assessment. If none of the criteria are met, then

⁵ Taking account of criteria published in: a) The Town and Country Planning (Development Management Procedure) (England) Order 2010 – 2010 No. 2184 [(Wales) Order 2012, No 801(W11)] (HMSO), b) The GLA's Supplementary Planning Guidance (SPG) on Sustainable Design and Construction (2014) and c) The Sussex Air Quality Partnership's Air Quality and Emissions Mitigation Guidance for Sussex Authorities (2013) v January 2014. The latter still requires a calculation of emissions even if an assessment is not required.

there should be no requirement to carry out an air quality assessment for the impact of the development on the local area, and the impacts can be insignificant. This should be agreed with the local planning authority.

Figure 4: Indicative Criteria for Requiring an Air Quality Assessment

The development will:	Indicative Criteria to Proceed to an Air Quality Assessment
Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans)	A change of LDV flows of: <ul style="list-style-type: none"> • more than 100 AADT within or next to an AQMA • more than 500 AADT elsewhere
Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight)	A change of HDV flows of: <ul style="list-style-type: none"> • more than 25 AADT within or next to an AQMA • more than 100 AADT elsewhere
Realign roads, i.e. changing the proximity of receptors to traffic lanes	Where the change is 5m or more and the road is within an AQMA.
Introduce a new junction or remove an existing junction around relevant receptors.	Applies to junctions that cause traffic to significantly change [how] vehicle[s] accelerate/decelerate, e.g. traffic lights, or roundabouts.
Introduce of change a bus station.	Where bus flows will change by: <ul style="list-style-type: none"> • more than 25 AADT within or next to an AQMA • more than 100 AADT elsewhere
Have an underground car park with extraction system.	The ventilation extract for the car park will be within 20 m of a relevant receptor, coupled with the car park having more than 100 movements per day (total in and out)
Have one or more substantial combustion processes <i>*This includes combustion plant associated with standby emergency generators (typically associated with centralised energy centre) and shipping</i>	Typically, any combustion plant where the single or combined NO _x emission rate is less than 5 mg/sec ²⁸ is unlikely to give rise to impacts, provided that the emissions are released from a vent or stack in a location and at a height that provides adequate dispersion. In situations where the emissions are released close to buildings with relevant receptors, or where the dispersion of the plume may be adversely affected by the size and/or height of adjacent buildings (including situations where the stack height is lower than the receptor) then consideration will need to be given to potential impacts at much lower emission rates. Conversely, where existing nitrogen dioxide concentrations are low and where the dispersion conditions are favourable, a much higher emission rate may be acceptable.

Appendix E: Model Conditions

This appendix provides examples of standard conditions that may be included in planning consents for prior commencement of development and prior to occupation.

Prior to commencement of development

Demolition and Construction Environmental Management Plan

1. Prior to the commencement of development, including demolition, a Demolition and Construction Environmental Management Plan (DCEMP) shall be submitted to and approved in writing by the Local Planning Authority. The DCEMP shall include:
 - a) An Air quality management plan that identifies the steps and procedures that will be implemented to minimise the creation and impact of dust and other air emissions resulting from the site preparation, demolition, and groundwork and construction phases of the development.
 - b) Construction environmental management plan that identifies the steps and procedures that will be implemented to minimise the creation and impact of noise, vibration, dust and other air emissions resulting from the site preparation, demolition, and groundwork and construction phases of the development.
 - c) Construction Logistics Plan that identifies the steps that will be taken to minimise the impacts of deliveries and waste transport.
2. The above plans shall not be written other than in accordance with TfL (Transport for London) Construction Logistics Plan Guidance and London Borough of Merton SPD 'Air Quality' and any later adopted guidance and policy.
3. The development shall not be implemented other than following the approved scheme, unless previously agreed in writing by the Local Planning Authority.

Reason: To ensure the development does not raise local environment impacts and pollution.

NRMM

All Non-Road Mobile Machinery (NRMM) used during the development that is within the scope of the GLA 'Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (SPG) dated July 2014, or any successor document, shall comply with the emissions requirements there.

Reason: To ensure the development does not raise local environment impacts and pollution

Electric Vehicle (EV) Parking

Prior to the commencement of development, details and implementation programme of the electric vehicle parking spaces shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be implemented other and following the approved scheme; shall be fully installed prior to occupation and thereafter kept as approved.

Reason: To accord with the terms of the application and requirements of current policy and to minimise the impact of car travel on the environment.

Cycle Parking

No building/dwelling/part of the development shall be occupied until cycling parking facilities have been provided following detailed drawings to be submitted to and approved in writing by the Local Planning Authority, such drawings to show the position, design, materials and finishes thereof.

Reason: To accord with terms of the application and to demonstrate that it is compliant with

the current London Plan.

Ventilation system

Prior to the commencement of development, a ventilation scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall:

- Identify measures to protect future users from external air pollution.
- Detail a maintenance scheme -The development shall not be implemented other and in accordance with the approved scheme; shall be fully installed prior to occupation and thereafter maintained in

Detail a maintenance scheme. The development shall not be implemented other and following the approved scheme; shall be fully installed prior to occupation and thereafter maintained in accordance with the approved scheme.

Reason: To promote good air quality design and to protect occupiers of the development from existing sources

Prior to occupation

Air Quality – Combustion Plant

Unless otherwise agreed in writing with the Local Planning Authority, no boiler or Combined Heat and Power (CHP) shall be installed within the development hereby approved, other than one that incorporates and has installed abatement technology to reduce emissions to below 0.04 gNO_x/kWh. 2. All systems shall be maintained in accordance with the manufacturer's instructions.

Reason: To minimise the NO_x emission.

Emissions Control Scheme

Prior to the occupation of any part of the development hereby approved, an emission control scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of measures to be implemented to minimise the direct and indirect emissions of air pollutants resulting from the development. The development shall not be occupied other than in accordance with the approved scheme.

Reason: To mitigate the impact of the development upon air quality.

Delivery and Service Plan

Prior to the occupation of any part of the development hereby approved, a comprehensive delivery and service plan, to manage, co-ordinate and minimise all deliveries and services, including waste services, to all parts of the development, shall be submitted to and approved in writing by the Local Planning Authority. Where developers are encouraged to consolidate Delivery and Service Plans with other neighbouring premises servicing neighbouring properties. The scheme shall provide details of measures to be implemented and maintained to minimise and manage all deliveries and services to all parts of the development to. Central pick up locations must be agreed, and personal deliveries discouraged. The development shall not be occupied other than in accordance with the approved scheme.

Reason: To reduce the number of vehicles and emissions from vehicles for deliveries and services and to mitigate the impact of the development upon local air quality.